General comments

Paragraph/policy/chapter/section referred to: **2.1.5 Unique environment**

Suggested approach and aim

Agree ☒ Agree subject to changes ☒ Disagree ☐

Suggested wording:

Agree ☒ Agree subject to changes ☐ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

Dorset's unique landscape, heritage, and rurality - the things that make it Dorset -The goal has to be to seek to accommodate whatever extra housing is required without damaging Dorset's unique landscape, heritage, and rurality. The plan purports to do this, but it is a general test to which the Council must be held on individual schemes.

Paragraph/policy/chapter/section referred to: **1.3.13 engagement with parish councils**

Suggested approach and aim

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

More detail about how this will be achieved. Many local councils feel that Dorset Council does not do all it can to work with Parish and Town Councils on planning matters. Parish and Town Councils should be engaged in the early stages of any application for a major development (for some small villages, half a dozen houses would constitute a major development). The standard period that Parish and Town councils are given to comment on planning applications should be increased to 1 month. In addition, it should become standard practice to consult with all neighbouring parishes when an application is received for a significant development (in excess of 50 properties, any wind turbines and any development taking up more that 4 hectares of land).

The proportion of CIL that is delivered to parish and town councils is not always sufficient to deal with demands placed on local infrastructure and some infrastructure (such as highways or schools) is the responsibility of Dorset Council but the demand and need is felt at a local level. Parish and Town Councils need to know how to make requests to tap into the CIL that Dorset Council retain in order to improve their local areas, especially if development has taken place in one village which would place a great demand on the services in a parish next door as the Parish Council in need wouldn't even receive CIL from the development.

Paragraph/policy/chapter/section referred to: **3.5.2 / 6.8.6 and 6.9.1**

Suggested approach and aim:

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☒ Agree subject to changes ☐ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

N/A

Paragraph/policy/chapter/section referred to: **3.5.1**

Suggested approach and aim:

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

There is no mention at all in the plan of the proposed Dorset National Park. If this plan goes ahead, it will have a significant impact on the Local Plan.

Paragraph/policy/chapter/section referred to: **2.2.5**

Suggested approach and aim:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

It is unacceptable that housing has to be added to Dorset because of unmet housing objectives in neighbouring areas. We accept that this is national policy and DC is not responsible for this but would like to see more push back. If the housing need cannot be met in other areas then they should be forced to do more to accommodate that need. Dorset should not be forced to loose its green spaces just so that the New Forest can keep its own.

Paragraph/policy/chapter/section referred to: **2.6.39**

Suggested approach and aim:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

It is good news that the presumption in favour of sustainable development will not likely impact tier 4 areas but the size of higher tier areas also needs to be considered to ensure that any development is appropriate and that local infrastructure is considered. Areas with a neighbourhood plan should also be afforded some manner of protection given that they would have gone to the effort of making neighbourhood plans and have therefore assessed the local requirements.

Paragraph/policy/chapter/section referred to: **ENV1 (iii)**

Suggested approach and aim:

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

The requirement for including provision of sufficient green infrastructure, should apply to all developments and not just strategic sites. Too often we see dead end rights of way or missing links across just a small piece of land and landowners are very often completely unprepared to offer up their land. If Parish and Town Councils cannot be consulted on pre-applications then (particularly for areas without a neighbourhood plan) the planning authority should hold a data bank of local wishes (such as allotments or a right of way linking village A to village B) so that it can champion local communities during the pre-application stage. 3.2.3 hints at the importance of partnership working but there is nothing in the policy to say how this will be achieved and what it would look like. This needs to be clearer and firmer.

Although encouraging developers to include "green corridors" as part of applications, there should also aim to create such connections retrospectively where possible. How will Dorset Council look to link smaller settlements where there would be unlikely to be development (such as tier 4).

We need to preserve the existing 'open space' and 'sense of space' aspects of our surroundings. We need to make our cities, towns, and villages pleasant places to live in, with open space either immediately available, our less than a few minutes' walk away. We must try to avoid the situation in which people have to drive to exercise etc. Windfall and infilling within existing settlements must be extremely limited for this reason.

Paragraph/policy/chapter/section referred to: **3.5.13**

Suggested approach and aim:

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

The concept of a valued landscape needs better specification (any limitations on size, location, ownership etc.) and local communities without a neighbourhood plan need to have a role in identification. "community value" should be included in the list of physical attributes that make a landscape valuable.

Paragraph/policy/chapter/section referred to: **3.10.2**

Suggested approach and aim:

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

"high standards of environmental performance will be sought…..". This needs to be amended in two ways. Firstly, high standards of environmental performance need to be applied to ALL developments; there is no reason that they shouldn't be applied. Secondly the word "sought" is too soft and can be ignored by developers; it should be changed to "will be achieved". There is a balancing act where affordable homes are concerned but homes that will be marketed at above the average local property price should be held to the highest environmental standards.

On environmental and climate change issues the whole tone needs to be affirmative and prescriptive if developers are to take any notice of the Local Plan, and positive results are to be attained. Section 3.10.10 (page 105) is an example in point. It states "Energy consumption can be reduced if buildings and layouts are designed to a good standard of environmental performance from the outset. Methods which may be appropriate include"; the section goes onto list a series of useful measure. However, the use of words such as "can" and "may" leave the decision to the developer; these words need to be changes to "will" and "must". The same point is relevant to policy ENV9 on page 106.

High standards of insulation should be specified for all housing, affordable or otherwise.

The cost of insulation could also be met (for low-income households) by a grant similar to the present grant for upgrading home insulation.

Paragraph/policy/chapter/section referred to: **3.14**

Suggested approach and aim:

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

3.14.12 - Typo- 'engagement' should be 'engage'

The whole Flood Risk section is far too unclear. The section should clearly state that the climate is in a state of dramatic change so there should be no development on any land that is classified as having a Flood Risk (Flood Zones 1-3); the clue is in the title. Flood Zone 1 may be calculated to have a 1 in a 1000 year chance of flooding today, but the climate is changing. Winters will be wetter and the sea level will rise. Within 25 years the 1 in a 1000 year chance will be significantly increased.

There should be absolutely no "engagement" with the Council if the land is in a flood risk zone (Section 3.14.12 – page 115). The rule should be firm and fixed. No building if there is a risk of flooding. Enough people today already have housing that is regularly flooded and is uninsurable and unsellable.

Figure 3.6 (page 116) – It is not acceptable to create conditions where affordable housing is more acceptable in flood risk areas. Incentives should be used instead to encourage development of brownfield sites to meet the housing need.

Section 3.14.16 (page 116) – there must be no "exceptions" to the case for not placing new development in flood risk zones.

The entire section entitled "Managing and Mitigating Residual Flood Risk (page 117) should be deleted. It is wrong to place any development in a flood risk zone.

Policy ENV13 (page 118) should be significantly modified. Points II and IV should be deleted. There should be no development on land at flood risk. They should be replaced by a simple statement saying that there will be no development on land with a Flood Risk (Flood Zones 1-3).

Point VII in Policy ENV12 (page 118) on the building of flood defences is a good one but is not detailed anywhere else in the Plan.

Paragraph/policy/chapter/section referred to: **Transport Network (Section 6.7)**

Suggested approach and aim:

Agree ☐ **Agree subject to changes ☒** Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes ☒** Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

The focus of this section is mainly on locating new development near facilities, and thus reducing the need to use private vehicles. Public transport is only addressed in cases where new developments absolutely require it (COM7, p.239). This is fine, but what about the poor public transport in the rest of the county, requiring residents to use private transport, contributing to 40% of Dorset's carbon footprint (Local Plan's own figures)? COM7 should include a section on improving public transport across the county, reducing the need for private vehicle use and reducing rural isolation. It should also include a section on how public transport will be de-carbonised.

Other key transport issues need consideration in this plan such as mitigating the use of small country roads by large commercial and agricultural vehicles, traffic speed in rural areas (including the use of 20 mph zones in rural areas).

Paragraph/policy/chapter/section referred to: **3.9.7**

Suggested approach and aim:

Agree ☒ Agree subject to changes ☐ Disagree ☐

Suggested wording:

Agree ☐ **Agree subject to changes ☒** Disagree ☐

How could the paragraph / policy / section / chapter be amended to reflect your concerns?

The provision of balcony space for dwellings in multi-storey buildings should be encouraged.

Change "Provision of outside space of at least equivalent to the ground floor footprint of a dwelling is seen as good practice" to read "Outside space of at least equivalent to the ground floor footprint of a dwelling should be provided." This is a firmer position.

Sites for housing and Employment

Site referred to: Crossways

Site allocation:

Agree ☐ **Agree subject to changes** ☒ Disagree ☐

Is there anything not covered within the policy that should be considered in relation to the site?

The pressure on local roads is considerable. The construction of a link road to the West Stafford bypass will only help with those who are trying to get to Dorchester. What is the aim for people who are travelling from this area to the east?

It is probable that people will try to use the B3390 to get up to the A35 in order to avoid the traffic hotspots at Wool, Wareham and Sandford. The B3390 was never intended to handle such heavy use. The cross-roads at Waddock Cross are particularly hazardous.

Crossways and Moreton are in the catchment area of St Mary's Middle School in Puddletown. And so, residents of Crossways will (for now) need to be able to easily access Puddletown. It is hard to see how this can be easily achieved via the narrow roads through the small villages to the north.

Are there any community infrastructure needs within the area that should be considered?

Consideration needs to be given to new or wider roads linking crossways with Bere Regis and these roads needs significant traffic calming strategies and pavements if they pass through any small villages.

The B3390 is particularly narrow and sinuous through Affpuddle and the level crossing at Moreton Station causes considerable delays. An Affpuddle bypass should be seriously considered but otherwise traffic calming along this section of the B3390 is crucial. A bridge over the railway at Moreton Station and improvements around the hazardous cross-roads at Waddock Cross would be advisable.

Crossways needs its own Middle School provision or safe roads linking it with Puddletown.

The primary reason for expanding Crossways, is the railway and so there needs to be assurance that South Western Railways will maintain or, better still, improve their Moreton service. 3 or so years ago, when the new franchise was let, SWR planned to reduce the service there in order to take 12 minutes off the run time to Weymouth from Waterloo - and Dorset County Council were initially supportive.

It is good news that a surgery is already planned for Crossways but further development should not now take place until this has been built.

Spatial Strategy / Settlement Hierarchy

Do the boundaries of the four functional areas reflect how the area's housing markets and economy function?

Yes ☒ No ☐

Is the distribution of housing between and within the functional areas appropriate?

Yes ☒ No ☐

Do you agree with the proposed hierarchy of settlements?

Yes ☒ No ☐

Do you agree that there is a need to amend the green belt to enable development?

Yes ☒ No ☐

How could the strategy/policy be amended to reflect your concerns?

Even for Tier 4 villages, common sense should be applied at the margin where useful and entirely compatible development supported by the community is envisaged.

More needs to be done to ensure that the housing development is accompanied by appropriate social infrastructure (funded by the housing developers as far as reasonable possible).

Little thought seems to have been given to the impact in Tier 3 and 4 areas that have significant housing and employment development in a Tier 1 and 2 area next door. An example being the impact of 600 houses in Crossways on areas with middle and secondary schools that serve Crossways. Thought needs to be given to all of the reasons that people would need to leave an area and where they will be travelling. The suitability of these roads then needs to be fully considered along with any other infrastructure in these areas that may need improving in order to meet extra demand.

Housing Mix

Do you agree that major residential development sites should provide at least 20% of the homes as accessible and adaptable homes to meet the needs of the elderly and less mobile?

Yes ☒ No ☐

Comments:

Housing suitable for retired and more elderly people needs to be smaller and affordable enabling older people to downsize.

There is again a reference to working with Parish Councils, this time to develop "suitable housing" (Section 4.1.3 page 132), but no clue is given how Parish Councils will be involved. This should be clarified.

Economy

Should any sites be added or removed from the list of Key Employment Sites in Appendix 6?

Yes ☐ **No** ☒

Comments: **Despite the statement that "Flexible policies for the rural area have been included instead of allocations in and around other settlements" it is unclear what this means. DEV7 (which operates outside of any development boundaries) does permit new employment, tourism, educational / training, recreational or leisure-related development. But it needs to be clear where and at what scale this is acceptable.**

Wind turbines

The locations identified as opportunities for larger scale wind developments are shown on Figure 6.5 and Figure 6.6. Do you support the principle of allocating any of the areas for wind turbines?

Yes ☐ **No** ☒

Are there any planning issues that would need to be resolved to enable community backing to be secured?

Yes ☒ No ☐

Comments:

As is clear from comments elsewhere and from the analysis by one of our Councillors attached to these comments as Appendix A, we support appropriate investment in renewable energy as a way of combatting the effects of climate change. It is, however, vital that such installations do not compromise the very environment, the essence of Dorset, that we are keen to preserve. That means schemes that are of appropriate scale given their surroundings and that have minimal impact on the landscapes, ecology, historic structures, and culture of the areas involved. Given the continual references elsewhere in the

document to working with Parish Councils and communities, it is also important that they are genuinely engaged and brought along with any such proposals. The map showing potentially suitable areas for wind farm sites should not be published at this stage. The identification of possible sites should be community led and no site should be identified in policy until it has community backing and a site-specific policy which has been produced with the local community.

The draft plan currently designates an area along the A35 corridor between Tolpuddle and Milborne St Andrew and areas on the south side of the Piddle Valley around Affpuddle and Cliffe as medium risk ecologically for wind turbine sites. Because of the scarcity of such sites in a county constrained by AONBs etc, and the loss (which surely needs to be challenged) of the Navitus Bay scheme that to many seemed the least objectionable way of accommodating this technology, there is a real prospect that applications will come forward here. The Dorset Local Plan needs to set a much clearer framework to guide any such applications. In particular:

- **it should be stated that such schemes will be judged not just against how they affect ecology, but also how they impact on historic structures, our cultural heritage and on the closely neighbouring AONB. Historic structures should include all listed buildings (not just be those listed Grade 1) because it is the pattern and density of historic buildings that is at issue. Objections on these grounds (including from English Heritage) led to the refusal or withdrawal of applications for giant wind turbines here a few years ago: they are every bit as relevant today. In this area cultural heritage must include links with the stories of Thomas Hardy, Dorset's most famous author and poet who derived so much of his inspiration from these landscapes. Lastly, the neighbouring AONB is important - it is not just the designated area that is special but the views into and out of it which would certainly include part of the A35 ridge.**
- **it must be a criterion that any such schemes should be of a scale appropriate to the landscapes in which they are to be set; a recent village survey of Tolpuddle found that 60% of residents were against large scale wind or solar farms in the area but where not necessarily against appropriately sized installations.**
- **it is crucial that any applicants are required to engage constructively with the local communities affected with the aim of achieving a consensus on what may be built. It should not be the case that an applicant's claims about the scale necessary to make a scheme viable in terms of the prevailing rates on offer should have priority over safeguarding our landscapes: if a scheme is only viable because it is inappropriate in scale, it should not go ahead.**

Broadband

The plan requires the provision of full fibre broadband connections to each home on major development sites. Do you agree with this proposal?

Yes ☒ No ☐

Comments:

Climate change

What else could the local plan do to mitigate climate change and help people adapt to its effects?

There are useful references to how historic buildings will be conserved, including through the use of the listing system, but also some helpful comments about improving energy efficiency in these buildings. The key here, is ensuring conservation officers take a pragmatic view and give sufficient weight to energy efficiency/renewable energy in their assessments of applications, especially for the second tier of listed buildings (i.e. below Grade 2*). All too often, they can refuse sensible changes (e.g. double/secondary glazing) when the historic impact is tiny but the environmental one is significant.

The Climate and Environment Emergency is noted as a Strategic Priority in the Plan, which is good. However, the Plan's focus is purely on mitigation issues - building away from potential flood areas etc.

There is nothing on adaptation. We would like to see issues included such as de-carbonising public transport, reducing the Dorset Council carbon footprint, improving public transport in order to minimise private car use etc.(page 17).

<u>Sustainable Drainage Systems (Section 3.15)</u>

The section is good, but the language needs to be more active and positive. For example, in Section 3.15.3 (page 120) the words "should therefore be integrated into development proposals" should be changed to "will therefore be integrated into development proposals". The same is true of section 3.15.6 (page 121), 3.15.8 (page 123), 3.15.9 (page 123) and Policy ENV14 (page 124).

<u>Low Carbon, Decentralised and Renewable Energy Schemes (Section 6.8)</u>

This section needs to be more affirmative. It needs to clearly set out what the targets are, and what will be undertaken. This whole section is very general.

In COM10 (page 246) words like "will be allowed wherever possible" (point 1) need to be replaced with "will be encouraged and allowed wherever possible.

One would expect to see clear reasoning, targets and proposed types of projects set out in this section for all renewable energy types. Compared to other sections, this section is too short, too general, and too negative.

There is no connection to the housing development section; all new houses should have their own renewable energy capacity built in automatically; this should include solar power and heat pumps.

Wind Energy Development (Section 6.9): This section is equally as general, weak and negative as Section 6.8. The same comments apply.

There is no mention of offshore wind farms. It may be that this is because this is not under the jurisdiction of Dorset Council but otherwise it needs consideration.

Dorset Council should explore with the Rail Regulator the feasibility and viability of a separate rail franchise, running a local lightweight battery-powered rail vehicle over the Network Rail lines between Weymouth, Dorchester, Wareham and Poole / Bournemouth.

3.7.6. The refusal of the proposed Navitus Bay Wind Park, must be challenged, on the grounds that it would be too far distant to affect how the WHS would be experienced or enjoyed in its surroundings, because its major feature, the geology, is invisible when looking out to sea.

3.10.6 The council should encourage the use of the higher (2025) standards wherever possible, so as to avoid costly later rework and lower energy bills for the occupiers.

6.8.3 Insulation and other methods of reducing energy consumption must be given an equal or greater importance to increasing the production of renewable energy. All energy generation and especially renewable generation, uses up land. Every saving on the other hand, leads to reduction in the amount of land that must be used for generation.

Appendix A – Further thoughts on climate change and renewable energy

The extra cost of high insulation and thus a reduced size of a high-performance heating system is quite small (less than £8,000 per dwelling according to Building Design), so should be specified for all housing, affordable or otherwise.

The Navitus Bay Wind Park could play a major role in climate change abatement. A consequence of not abating climate change would be higher sea levels and more rock fall due to increased erosion, both of which would impede access to the WHS geology. The Wind Park's OUV rating does not mention the views out to sea.

The minor cost of meeting the 2025 insulation standard (£2,500 – Building Design Oct 2019), may persuade prospective purchases to opt for its inclusion in the original build, rather than as a costly retro-fit. Dorset Council should encourage, or require if legally possible, all developers to provide prospective purchasers with an accurate estimate of the extra cost of insulating the building to the 2025 standard and separately the cost of providing heating equipment to the 2025 standard.

The figures for land usage for renewable generation are roughly 18 sq.m./MWhr/yr for solar, 250 sq.m./MWhr/yr for wind and 890 sq.m./MWhr/yr for Biomass (at 5 t/ha/yr). Most of the land under wind turbines, is usable for agricultural or similar uses.

Land will also be needed for energy storage plant to maintain essential supply, which cannot be conveniently time-shifted, during dips or lulls in the intermittent supply from the renewables.

6.8.4 The DCC paper on the Climate & Ecological Emergency Strategy (July 2020) estimated that the peak power of installed solar in Dorset is nearly 480 MW, generating approx. 480 GWhr/yr on approx 1,000 ha (2,500 acres). To generate all Dorsets needs (after maximum savings), up to 10 times that area will be needed.

The DCC paper on the Climate & Ecological Emergency Strategy (July 2020) estimated that after savings, Dorset would need Renewable Energy generation capacity of 4,000 MW (Solar) - approx 19,000 acres - or 2,000 MW (Wind) - approx 250,000 acres - or a combination of both, although no account was taken of imported generation demand from land shortage areas such as BCP and elsewhere.

It is therefore probable that considerable compromises will have to be made, if the zero-carbon objective is to be achieved. This should be the subject of future consultation, within the time frame of the Plan.

References:

- Biomass and Solar PV - www.biofuelwatch.org.uk/2018/biomass-and-land-use/
- Solar PV - http://chelwood.org/the-project/project-details/
  - www.lowcarbonhub.org/p/ray-valley-solar-fact-file/
- Wind energy - www.withouthotair.com
  - http://css.umich.edu/factsheets/wind-energy-factsheet