West Dorset, Weymouth & Portland Local Plan Review

Preferred Options Comment Form



Please return by midnight 8 October 2018 to:

strateni	c@dorset.	aovuk
strategi	Ceuoisel	yov.ur

OR

Local Plan Consultation, South Walks House, South Walks Road, Dorchester, DT1 1UZ

PART A

ALL COMMENTS MUST BE SUPPORTED BY YOUR NAME AND ADDRESS

1.	. P	er	soi	nal	Det	tail	S

2. Agent's Details (if applicable)

Tit l e*	Mr	
First Name*	Will	
Last Name*	Austin	
Job Title (where relevant)	Town Clerk	
Organisation (where relevant)	Bridport Town Council	
Address Line 1*	Mountfield	
Address Line 2*	Rax Lane	
Address Line 3	Bridport	
Address Line 4	Dorset	
Post Code*	DT6 3JP	
Telephone Number	01308 456722	
Email Address*	WAustin@bridport-tc.gov.uk	

*Indicates a required field

NOTE - IF YOU SUBMIT YOUR FORM BY EMAIL YOU DO NOT NEED TO ALSO PROVIDE A PAPER COPY.

This form has two parts: PART A – Personal Details PART B – Your comment(s)

How the information you provide will be used:

The information you provide will be used by West Dorset District Council and Weymouth and Portland Borough Council for the purpose of the Local Plan Review. Contact details are collected to record and collate comments and so that we can keep you informed about the consultation.

When submitting information you should be aware that:

- Your comments, name and organisation (if relevant) will be made available on the internet and in council offices for public inspection. Addresses, email addresses, telephone numbers and signatures will be removed
- It will be shared with an independent planning inspector
- Your information will be retained by the council in line with its information retention schedule. Your data will be destroyed once the plan becomes redundant

If you have any concerns about how your information is used please contact: strategic@dorset.gov.uk

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REP NO:

	POLICY REF:	
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West Dorset, Weymouth & Portland Local Plan Review

Preferred Options Comment Form



PART B – Please use a separate sheet for each comment you wish to make

TART D - Hease use a separate sheet for each comment you wish to make
Name / Organisation: Bridport Town Council
I'm commenting on: Preferred Options 🖌 Sustainability Appraisal 🖌
3. To which part of the document do your comments relate?
Topic/Chapter* See attached
Policy Question Figure Paragraph
Are you*: Supporting 🖌 Objecting 🖌 Neutral 🖌
Please use the box below to set out your comments: Please use a separate sheet for each comment you wish to make
(It is helpful if your comments can be clear and reasonably concise. If you wish to submit a lengthy representation please summarise your response here in no more than 100 words and attach any additional information to the comment form.)
Bridport Town Council's comments on the Preferred Options document and the Sustainability Appraisal are shown in the attached sheets.
(Continue on a separate sheet if necessary)
If you would like to provide any additional information or evidence to support your comments please provide a brief explanation below of what the document is and how it supports your response.
Document: Responses to Preferred Options Consultation Aug 2018
Explanation for document:
The number of responses submitted makes use of individual comment forms for each comment inappropriate.

Signature*: W R Austin

REP NO:

*Indicates a required field

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EF:

Date: 8 October 2018

Bridport Town Council

Joint Local Plan Review for West Dorset And Weymouth and Portland Responses to Preferred Options Consultation Aug 2018

1-i The local plan review will cover the period from 2016 to 2036. The start date reflects when the most up-to-date household projections (2014-based) were published and the end date is as recommended by the inspector of the currently adopted local plan. Do you agree that the local plan review should cover the period from 2016 to 2036?

Yes, Bridport Town Council agrees that 2016 to 2036 is the appropriate period for the local plan review to cover.

1-ii The section on 'the plan context' has been revised to bring it up to date. The revised section draws on much of the contextual information included in the Initial Issues and Options Consultation Document for the local plan review. Does this revised section adequately capture the key environmental, social and economic issues facing the plan review area?

Bridport Town Council considers that Note 2 at the foot of page LPR 5 should reflect the Bridport Area Neighbourhood Plan Area, and so should incorporate the parish of Symondsbury. The population figure for the Bridport area shown at paragraph 1.2.4 should also be updated to reflect this change.

1-iii A single vision is proposed for the local plan review area and the local plan's 'strategic objectives' have been re-named 'strategic priorities'. The role of the vision, strategic priorities and strategic approach in plan-making and decisiontaking has also been clarified. Do these changes provide a clearer strategic policy direction for the local plan review and any other planning policy documents?

Bridport Town Council accepts the strategic policy direction, subject to the following comments:

- At page 13, we request that the phrase "as far as possible" be removed from the reference to meeting local housing needs. This qualification has not been applied to other priorities and appears to assume failure from the outset.
- At page 15, we support the last sentence at the top of the page starting "Development should not undermine...", and ask that this statement be followed through in policies and developments.

1-iv The text has been updated to explain: what the Government considers sustainable development to mean; and what the councils are aiming to achieve in terms of sustainable development locally. Do these changes provide sufficient clarity on what is meant by sustainable development?

Bridport Town Council considers that the updated text explaining sustainable development is a welcome improvement to the document.

1-v Policy INT1 and supporting text have been revised to reflect the proposed changes to 'the presumption in favour of sustainable development' set out in the draft revised NPPF. Does revised Policy INT1 (and its supporting text) provide clarity on how the revised 'presumption' in national policy will be applied locally?

Yes, Bridport Town Council considers that the revised Policy INT1 provides sufficient clarity.

2-i Policy ENV1 has been revised to provide a clearer framework for assessing how development may affect designated and non-designated landscapes. Do you have any comments on the changes to Policy ENV1?

Bridport Town Council has no comment to make on changes to Policy ENV1.

2-ii Policy ENV2 is a new policy relating to sites of geological interest, including the Dorset and East Devon Coast World Heritage Site. Do you have any comments on new Policy ENV2?

Bridport Town Council supports new policy ENV2.

2-iii Former Policy ENV2 (now ENV3) has been revised to more clearly set out how harm to biodiversity will be avoided and net benefits secured. It has also been updated to reflect changes to national policy in relation to irreplaceable habitats and veteran trees. Do you have any comments on these, or any other changes to new Policy ENV3?

Bridport Town Council asks that the impact of the UK's impending withdrawal from the EU be considered in relation to EU regulations referred to on pages 26 and 27.

2-iv Former Policy ENV₃ (now ENV₄) has been redrafted to define the elements that make up the green infrastructure network in the plan review area and to set out how the network will be protected, expanded and enhanced. Do you have any comments on new Policy ENV₄?

Bridport Town Council requests that the commitment to local partnership working in 2015 Policy ENV3(i) be restored in the revised Local Plan as follows: "The councils will work together with local communities and other relevant partners to develop a green infrastructure strategy for the plan area."

2-v Former Policy ENV4 (now ENV5) has been revised to more clearly set out how impacts on the significance of designated and non-designated heritage assets and proposals for enabling development will be considered. Do you have any comments on new Policy ENV5?

Bridport Town Council requests that areas of archaeological potential are highlighted at paragraph 2.4.18, by restoring the text from 2015 paragraph 2.3.8 as follows: "Applications affecting sites of archaeological importance must be accompanied by the results of an archaeological assessment and, where necessary, a field evaluation in order that an informed decision can be made on the application. This may also be required in areas of archaeological potential. Advice is available from the County Archaeologist."

Bridport Town Council notes changes in the text referring to demolition of important local buildings (as shown in 2015 paragraphs 2.3.12 and 2.3.13). We consider that the original text from 2015 paragraphs 2.3.12 and 2.3.13 should be restored in paragraph 2.4.20.

2-vi Former Policy ENV5 (now ENV6) has been revised to provide more guidance on how the 'sequential test' in relation to flooding will be applied. Former Policy ENV6 relating to local flood alleviation schemes has been deleted and replaced by some commentary in the supporting text. Do you have any comments on new Policy ENV6 or the deletion of former Policy ENV6?

Bridport Town Council would prefer the restoration of local consultation on flood alleviation schemes as set out in the 2015 Local Plan, policy ENV6.

2-vii Former Policy ENV7 has been replaced by a separate policy (new Policy ENV7) on land instability, which includes more detail on how proposals for development in the Charmouth and Lyme Regis Land Instability Zones will be assessed. More detailed policies (new Policies ENV8 and 9) have been drafted to set out the approach to development proposals at risk from coastal erosion. Do you have any comments on new Policies ENV7 to 9?

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Bridport Town Council has no comment to make on policy ENV7, and supports policies ENV8 and ENV9 as drafted.

2-viii Former Policy ENV9 (now ENV11) has been expanded to relate to air pollution as well as water pollution and contaminated land. Do you have any comments on new Policy ENV11?

Bridport Town Council has no comment to make on new Policy ENV11.

2-ix Former Policies ENV10 and 11 (now ENV12 and 13) have been revised to more clearly set out design expectations in relation to the landscape and townscape setting and the pattern of streets and spaces. Do you have any comments on new Policies ENV12 and 13?

Bridport Town Council would like an explanation for the removal of a commitment to public art, and to historical, ecological or geological features, as contained in 2015 Policy ENV10.

In new Policy ENV13, climate change should be a criterion for sustainability in design.

2-X Former Policy ENV12 (now ENV14) has been revised to more clearly set out expectations in relation to the siting and design of buildings. Do you have any comments on new Policy ENV14?

Bridport Town Council has no comment to make on new Policy ENV14.

2-xi Should the councils gather more evidence with a view to including policies in the local plan review which would apply the additional accessibility and adaptability standard and the optional nationally described space standard?

Bridport Town Council agrees that the councils should gather more evidence with a view to including policies that would apply the additional accessibility and adaptability standard and the nationally described space standard.

2-xii The supporting text to the former Policy ENV13 (now ENV15) has been redrafted to clarify how the councils aim to achieve higher levels of environmental performance for larger developments, individual buildings and historic buildings. Do you have any comments on new Policy ENV15?

Was this policy and the supporting text drafted to NPPF standards, and can more prescriptive standards be used? Without an answer to this question, an informed response to question 2-xii is not considered possible.

2-xiii Former Policy ENV15 (now ENV17) has been expanded to set out more clearly how the councils will encourage the effective and efficient use of land. Do you have any comments on new Policy ENV17?

Bridport Town Council has no comment to make on new Policy ENV17.

2-xiv Former Policy ENV16 (now ENV18) has been expanded to cover the issue of loss of daylight and sunlight. The issue of air pollution is now dealt with in new Policy ENV11. Do you have any comments on new Policy ENV18?

Bridport Town Council welcomes new Policy ENV18.

3-i The need for 794 dwellings per annum (15,880 homes in total) has been based on the Government's proposed new standard methodology. The need for employment land (51.6 hectares) has been based on the 2016 Workspace Strategy. Do you consider that these figures represent the 'objectively assessed need' for housing and employment land for the period 2016 to 2036?

Bridport Town Council requests figures showing the split between West Dorset and Weymouth & Portland Districts, for the number of dwellings and the area of employment land. This split should also be shown in the revised Local Plan.

Related to this, policy SUS1 should plan for the staged delivery of employment land over the plan period.

3-ii The sites listed in Table 3.3 include both allocations from the current local plan and new 'preferred options' which have not previously been allocated. Do you consider that these are the most appropriate housing (or mixed use sites) sites to allocate to contribute towards meeting the objectively assessed need for housing for the period 2016 to 2036?

Bridport Town Council considers that the sites at Table 3.3 should incorporate recently announced proposals for housing at the Bridport Flood Lane and Fisherman's Arms sites, and other sites in Bridport that have been considered for housing/mixed use, for example the Bus Station. Any changes from the 2015 Local Plan should be justified in the document text.

3-iii Table 3.3 (and the supporting text that follows) sets out (and explains) the different sources of housing supply to meet (and exceed) the objectively assessed need for housing for the period 2016 to 2036. Do you have any comments on the overall level of provision made or the sources of supply identified?

Bridport Town Council considers that the housing supply at Vearse Farm should be limited to 760. Please refer to our separate comments in respect of para 13.4.5.

3-iv Table 3.4 identifies the different sources of employment land supply and Table 3.5 identifies the allocations that will contribute to that supply to meet (and exceed) the objectively assessed need for employment land for the period 2016 to 2036. Do you have any comments on: the overall level of provision made; the sources of supply identified; or the sites allocated?

Please note that the table numbering is incorrect in the above question. Table 3.5 identifies the different sources of employment land, and Table 3.6 identifies the allocations.

Bridport Town Council asks why the Bus Station site in Bridport has been excluded from Table 3.6.

3-v Policy SUS2 and supporting text have been revised: to more clearly set out how growth will be directed to different levels of the settlement hierarchy; and to set out the approach to growth at settlements where new DDBs have been introduced in neighbourhood development plans. Do you have any comments to make on these changes, or any other changes to Policy SUS2 and supporting text?

Bridport Town Council has no comment to make on the changes to Policy SUS2.

3-vi Overarching objectives in relation to the re-use of buildings outside DDBs are established in the supporting text and Policy SUS3 has been revised to set out how any scheme for re-use would be judged against these objectives. The policy has been amended to generally permit the re-use of existing buildings outside DDBs for residential purposes and to more closely reflect national policy on residential re-use in isolated locations. Do you have any views on the proposed changes to Policy SUS3 and supporting text?

Bridport Town Council has no comment to make on the changes to Policy SUS3.

3-vii It is proposed to delete Policy SUS4 in the current local plan because it unnecessarily duplicates the provisions of Policies HOUS6 and ECON1, which deal with the issues of replacement dwellings and replacement employment buildings, respectively. Do you have any views on the proposed deletion of Policy SUS4 in the current local plan?

Policy SUS4 in the 2015 Local Plan referred specifically to measures to protect against the loss of a heritage asset, and this is not replicated in either HOUS6 or ECON1. Bridport Town Council considers that this should be reinstated.

3-viii former Policy SUS5 (now SUS4) has been updated to provide clearer advice on how neighbourhood development plans should be prepared to meet the 'basic conditions' and comply with national guidance. Do you have any comments on new Policy SUS4?

Bridport Town Council has no comment to make on new Policy SUS4.

3-ix Do you have any comments on the proposed approach to establishing housing requirement figures (and indicative figures) for designated neighbourhood areas?

Bridport Town Council supports the statement in paragraph 3.6.19 that states; "Neighbourhood development plans for these settlements would not need to identify any additional land to meet the overall plan review area housing need figure".

The emerging Bridport Area Neighbourhood Plan does not intend to bring forward any additional housing sites in the Neighbourhood Plan area, preferring to focus policies on ensuring that housing allocations in the Neighbourhood Plan area deliver 'affordable' homes of a tenure and mix that responds to defined local housing needs and maintains a balanced community.

4-i Policy ECON1 has been revised to more clearly set out the approach to employment development in rural areas. Do you have any views on this, or any other changes, to Policy ECON1?

Bridport Town Council has no comment to make on the changes to Policy ECON1.

4-ii The list of key employment sites in Figure 4.1 has been revised to include new employment land allocations: north of Dorchester; south of Broadwindsor Road, Beaminster; and west of Sherborne. The approach to employment and other uses on key employment sites has also been updated. Do you have any comments on these, or any other changes to Policy ECON2?

Bridport Town Council suggests that it might be beneficial to include St Michael's Trading Estate as a key employment site under Policy ECON2, and proposes the removal of the word "Exceptionally" from Policy ECON2(iii).

4-iii The approach to employment and other uses on other (non-key) employment sites has been updated. Do you have any comments on these, or any other changes to Policy ECON₃?

Bridport Town Council has no comment to make on the changes to Policy ECON3.

4-iv The need for additional retail development has been re-assessed in a new town centres and retail study. Do you have any comments on the reassessed need for retail development, as set out in new Policy ECON4?

Bridport Town Council is concerned that the assessment used is already out-of-date, may be inaccurate, and that the figure for non-food (comparison) floor space in Bridport taken from this figure (and shown at para 13.3.6) may be over-optimistic and inappropriate for the town.

4-v Part of former Policy ECON4 (now ECON5) establishes an approach to the location of town centres uses by requiring a 'sequential test' to be applied and impact assessments to be produced in certain circumstances. A hierarchy of centres has also been defined in the supporting text (Table 4.2). Do you have any comments on new Policy ECON5 or the supporting text?

The question incorrectly refers to Table 4.2 as the hierarchy of centres. In the document this is Table 4.3.

Bridport Town Council agrees with Policy ECON5 and the supporting text.

4-vi Part of former Policy ECON4 (now ECON6) sets out an updated approach to the protection of retail frontages. Do you have any comments on this approach, as set out in new Policy ECON6?

Bridport Town Council proposes that a requirement to adhere to relevant Neighbourhood Plan policies be included in new Policy ECON6.

4-vii A new policy is being proposed to restrict hot food takeaways within easy walking distance of schools and other areas where children congregate. Do you have any views on new Policy ECON7?

Bridport Town Council supports new Policy ECON7.

4-viii A new policy has been introduced to protect markets. Do you have any views on new Policy ECON8?

Bridport Town Council supports new Policy ECON8.

4-ix Former Policies ECON5 and 6 (now ECON9 and 10) now set out the circumstances when the 'sequential test' for town centre uses will be applied to tourist attractions and accommodation developments. Do you have any views on this, or any other changes to new Policies ECON9 and 10?

Bridport Town Council is concerned that new Policy ECON9 may not be workable for all types of attraction, and may not be appropriate for smaller market towns.

Bridport Town Council proposes a change to the second bullet point under ECON9(iii) to read "provide wider economic benefits, such as helping maintain, <u>enhance and protect</u> an historic building; or"

Bridport Town Council has no comment on new Policy ECON10.

4-x Former Policy ECON7 (now ECON11) and supporting text have been amended to give greater clarity in relation to the expansion, intensification and reorganisation of existing caravan and camping sites and to set out how proposals for caravan and camping sites as part of farm diversification schemes will be considered. Do you have any views on these, or any other changes, to new Policy ECON11?

Bridport Town Council considers that term 'Heritage Coast' as referred to in new Policy ECON11 and the supporting text must be clearly defined in order to (i) enable meaningful comment on this

policy, and (ii) provide for objective interpretation/enforcement. How far inland will this area stretch?

4-xi Former Policies ECON8 and 9 (now ECON12 and 13) and supporting text have been amended to give greater clarity about when new agricultural buildings and diversification projects will be permitted. Do you have any views on these, or any other changes, to Policies ECON12 and 13?

Bridport Town Council has no comment to make on the changes to Policies ECON12 and ECON13.

4-xii Former Policy ECON10 (now ECON14) and supporting text has been expanded to provide guidance on how proposals for different types of equestrian-related development will be considered. Do you have any views on these, or any other changes, to new Policy ECON14?

Bridport Town Council has no comment to make on the changes to new Policy ECON14.

5-i In order to reflect changes (or proposed changes) to national policy, Policy HOUS1 and supporting text have been amended to: establish thresholds above which affordable housing will be sought; offer 'vacant building credit' on brownfield sites; provide greater clarity on how viability should be assessed; and reflect the proposed broader definition of affordable housing in the split of tenures models sought. Do you have any views on these changes, or any other changes, to Policy HOUS1?

Bridport Town Council is concerned that Policy HOUS1 will not achieve the affordable housing requirement for Bridport.

Bridport Town Council further disagrees with the provisions for 'vacant building credit', not least because this may reduce provision and result in the unnecessary use of greenfield sites for affordable housing.

5-ii Policy HOUS2 and supporting text have been amended to: set out how any exception scheme should meet identified local needs; and clarify that affordable home ownership products (including affordable self build and custom build homes) may be permitted on exception sites. Do you have any views on these changes, or any other changes, to Policy HOUS2?

Bridport Town Council has no comment to make on the changes to Policy HOUS2.

5-iii There has been some minor updating of: Policy HOUS₃ – Open Market Housing Mix; Policy HOUS₄ – Development of Flats, Hostels and Houses in Multiple Occupation; Policy HOUS₅ – Residential Care accommodation; and text in relation to sites for Gypsies, Travellers and Travelling Showpeople. Do you have any views on the changes to these policies and supporting text?

Bridport Town Council has no comment to make on the changes to Policies HOUS3, HOUS4 and HOUS5.

5-iv Policy HOUS6 and supporting text have been amended: to include a new section on ancillary domestic buildings within residential curtilages; to provide more detail on how other proposals for residential development outside DDBs will be considered; and to establish that, as a guide, replacement dwellings should be no more than 50% larger than the original. Do you have any views on these changes, or any other changes, to Policy HOUS6?
 It should also be noted that the section on rural workers' dwellings has been separated out and expanded to form new Policy HOUS7.

Bridport Town Council has no comment to make on the changes to Policy HOUS6, except as stated in relation to deleted 2015 Policy SUS4: Policy SUS4 in the 2015 Local Plan referred specifically to measures to protect against the loss of a heritage asset, and this is not replicated in either HOUS6 or ECON1. Bridport Town Council considers that this should be reinstated.

5-v New housing for rural workers is one form of residential development that may be permitted outside DDBs under Policy HOUS6 of the current local plan. It is proposed that new Policy HOUS7 would deal specifically with this issue setting out in more detail how proposals for permanent and temporary occupational dwellings would be considered and how proposals for the removal of any occupancy conditions would be determined. Do you have any views on the proposed new Policy HOUS7?

Bridport Town Council considers that in paragraph 5.8.2 of the supporting text to new Policy HOUS7, security should be an allowable need, given the extent of and increase in rural crime.

In policy HOUS7, the financial test must be suitable for all circumstances, for example where occupants aim for self-sufficiency – in such a case a test that is too commercially-oriented may result in inappropriate refusal of permission.

5-vi Policy HOUS8 sets out the councils' approach to self-build and custom-build housing; on larger housing sites; outside DDBs; and in neighbourhood development plans. Do you agree with the Councils proposed approach to the provision of self-build and custom-build housing?

For the purposes of adequate consultation, and for the policy itself, a definition of self-build and custom-build should have been included in the glossary.

5-vii Should the councils allocate additional sites exclusively for self-build and / or custom-build housing? If so, which specific sites should be allocated?

Bridport Town Council considers that the councils should allocate additional sites for self-build and/or custom-build. Bridport Town Council proposes that specific site allocation should be determined via the Neighbourhood Plan, and through Community Land Trust designation for self-build.

6-i The supporting text to Policy COM1 has been revised: to define the large strategic sites (including some new allocations) that will need to meet their infrastructure needs through planning agreements, rather than through the Community Infrastructure Levy (CIL) (paragraph 6.2.6); and to set out standards for the provision of certain types of infrastructure (Tables 6.1 to 6.4). Do you have any comments on these or any other changes?

Bridport Town Council has no comment to make on the changes to the supporting text to Policy COM1.

6-ii Policies COM2 to COM6 dealing with community buildings, open space, recreation facilities and education provision remain largely unchanged. Do you have any comments on these policies?

Bridport Town Council has no comment to make on Policies COM2 to COM6.

6-iii The supporting text to Policy COM7 provides: updated commentary on the implications of Local Government Reorganisation for transport planning in Dorset; information on commuting patterns; and clarifies what is meant by a `severe' impact on the transport network. Policy COM8 relating to transport interchanges has been deleted. Do you have any comments on the changes to the supporting text to Policy COM7 or on the proposed deletion of Policy COM8?

Bridport Town Council disagrees with the deletion of policy COM8. Pressure on public transport and housing means that transport interchange facilities remain vital for the sustainability of the community. Summary removal of the policy, without any written justification for this, is

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unacceptable. In Bridport, a transport hub remains an essential facility, and must be located at the existing Bridport Bus Station.

6-iv Former Policy COM10 (now COM9) has been updated to reflect the need for new homes and businesses to be provided with fibre cabling to support higher quality broadband provision. Do you have any comments on this, or any other changes to new Policy COM9?

Bridport Town Council has no comment to make on new Policy COM9.

6-v Policy COM11 is a new policy dealing specifically with wind energy developments. Do you have any comments on this new policy?

Bridport Town Council has no comment to make on new Policy COM11.

13-i Former Policy BRID4 (now BRID1) has been amended to cover a wider range of issues in relation to sites for the possible future expansion of Bridport town centre. Do you have any comments on new Policy BRID1?

Bridport Town Council's comments on new Policy BRID1 and the supporting text are:

PARAGRAPH OR POLICY NO.	COMMENT
13.1.3	Bridport Town Council requests that "is located within" is replaced with "is part of". This avoids any confusion over Bridport's status as part of the AONB.
13.1.4	Bridport Town Council considers that this text will need to be updated if, as is likely, the Bridport Area Neighbourhood Plan is made prior to the adoption of a revised Local Plan.
13.2.1	 Bridport Town Council comments as follows: Third bullet: Request that specific reference is made to hillside views, and to views as seen from the urban area of Bridport Fifth bullet: The text makes reference to encouraging alternatives to the private car. We support this statement and would prefer to see specific measures in the Local Plan policies for Bridport that will help to achieve this.
13.3.3	 Bridport Town Council requests that the definition of the primary and secondary shopping frontages be amended as follows: The frontage on the south side of East Street should extend as far as the Lord Nelson public house. This additional length includes vital town centre facilities such as Barclays and NatWest Banks. The frontage on the north side of West Street should extend as far as Costa Coffee. The additional length includes Nationwide, TSB, and the Post Office. The primary area shown in South Street includes the Library.

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13.3.4	Bridport Town Council considers that this statement should be
	strengthened to include the fact that the street market is twice weekly,
	and that other monthly markets are provided.
PARAGRAPH OR POLICY NO.	COMMENT
13.3.6	Bridport Town Council considers that this paragraph does not appear to take account of the changing nature and needs of town centres. There should be flexibility to allow for cultural and leisure facilities as a contribution to the town centre 'offer', which will need to adapt to the challenge of the internet. The paragraph also understates the importance of independent retailers. Their fundamental importance to the town's visitor offer, and the need to continue their expansion, should be highlighted here.
13.3.7	Bridport Town Council considers that the term "If needed" is at odds with the designation of these sites as "strategic" on page 307, which implies a requirement.
	In line with our comment on para. 13.3.6, the Bus Station site should be highlighted as offering an opportunity to incorporate facilities that complement the town's retail provision, such as leisure facilities. The text as it is drafted implies that additional retail provision is the only consideration, and this shows a lack of understanding of both the general needs of town centres, and the specific requirements as they apply to Bridport.
	Bridport Town Council does not support the designation of Rope Walks Car Park as an expansion site. The car park and its location are vital aspects of the support needed for the retail area. Bridport Town Council also opposes any plan to build over the parking area, as this would impact adversely on the surrounding historic and listed buildings.
	Bridport Town Council supports the absolute need for the retention of the Bus Station and for a transport hub. Bridport Town Council does not support the relocation of the Bus Station and transport hub to any site more distant or less accessible from the town centre, as such a change would be wholly inappropriate for older people and for those with limited mobility. It is not appropriate to consider relocation without including a suitable alternative site for consultation.
13.3.8	Bridport Town Council considers that there should be no loss of parking at the Tannery Road site.
13.3.9	Bridport Town Council is concerned that the text as drafted may allow for either a multi-storey car park, or a building with parking beneath. These are opposed as they would adversely impact on the conservation area and listed buildings.
13.3.10	Bridport Town Council does not support this statement, as it appears to be part of the justification for the redevelopment of Rope Walks Car Park.

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13.3.11	Bridport Town Council does not support this statement. A town centre
	masterplan, driven by the local community via the Bridport Area
	Neighbourhood Plan, and a supporting retail assessment are required.
BRID1 (i)	Bridport Town Council requests that "Rope Walks and" be removed.
PARAGRAPH OR	COMMENT
POLICY NO.	
BRID1 (ii)	Bridport Town Council requests replacement of "an appropriate" with "at least the existing".
BRID1 (iv)	Bridport Town Council considers that this policy requires clarification. There is no indication of what "integrated" means in this context, or
	how it will work.
as ii The summ	artis a taut to form or Dollar, DDIDs (now DDIDs) has been smoothed to
	orting text to former Policy BRID1 (now BRID2) has been amended to
-	at the Verse Farm site has the capacity to deliver about 930 new homes
(rather th	an 760 as originally envisaged). Do you have any comments on the
changes t	o new Policy BRID2?
	sille comments on new Deliev DDID2 and the currenting text and
Bridport Town Coun	cil's comments on new Policy BRID2 and the supporting text are:
PARAGRAPH OR POLICY NO.	COMMENT
13.4.1	Bridport Town Council considers that this paragraph should include the
	specific number of employment units, amount of employment floor space, and
12.4.2	number of residential units that are to be incorporated into the site.
13.4.2	Bridport Town Council requests that provision be made in policies for this site for homes that younger local people can afford.
13.4.5	Bridport Town Council considers that:
	 The development of Vearse Farmhouse needs very careful consideration
	dues to the potential impact on the listed building, the heritage aspects of
	the site, the potential archaeological importance. It is thought that there
	was a Danish encampment on the site, established in the late 8 th century.
	The land west of Coronation Road and to the west of Pine View include
	historic footpaths, and pedestrian/dog walking routes that are of
	importance to the local community. These routes should be retained as
	green space. It should be a requirement of any development that a
	comprehensive wildlife assessment is carried out.
	 170 additional homes would place an extraordinary strain on local supporting infrastructure, and on the transport network.
	 supporting infrastructure, and on the transport network. Any further development beyond that agreed to date must reconsider the
	access impact and arrangements at both the A35 junction, and on the
	B3162.
13.4.6	Bridport Town Council considers that:
	Whilst the proposed residential care facility will be required, a replacement
	for Sydney Gale House is likely to be provided off South Street, Bridport,

PARAGRAPH OR	COMMENT
POLICY NO.	 before the Vearse Farm development. The wording should be amended to reflect this. All development at the Vearse Farm site must incorporate the fastest and latest broadband connectivity.
13.4.7	Bridport Town Council considers that the commitment to a district heating network, included in the 2015 Local Plan (at para 13.3.3) and omitted from this document, should be reinstated.
13.4.8	Bridport Town Council considers that there is a need for further consideration of the potential flood risk impact of an additional 170 homes. The text as drafted considers only the very localised impact, and there should be an assessment that takes account of potential impact on any part of the wider Bridport area.
BRID2 (iv)	Bridport Town Council believes that the highway improvements described in Policy BRID2 (iv) must be delivered prior to the commencement of any on-site construction works.
BRID2 (viii)	 Bridport Town Council questions the reason for removal of a commitment to a BREEAM assessment from Policy BRID2 (viii). Has it already been completed? If so the Council requests a copy of the assessment. Bridport Town Council also requests the following changes to Policy BRID2 (viii): Amend existing text "The masterplan should ensure that:" to read "The masterplan will ensure that:" Fourth bullet: The meaning of the term "improved access" needs clarification to make clear what is needed and for whom. Fifth bullet: There should be a stated commitment to paths being satisfactory for use by mobility scooters. Seventh bullet: Re-word "Existing hedgerows" to read "Existing hedgerows and trees" Eighth bullet: The policy should state that Bridport Town Council and Symondsbury Parish Council must be engaged in the development of a construction management plan for the site.
Bridport Town Council also has the following comments in respect of the supporting text to Policy BRID4:	
PARAGRAPH OR POLICY NO.	COMMENT
13.4.12	Bridport Town Council considers that the text of paragraph 13.4.12 should be amended from "has planning permission" to "has outline planning permission".
	Bridport Town Council also considers that this section should make clear the need to restore the buildings damaged by fire at the site in July 2018.
13.4.13	Bridport Town Council considers that:

PARAGRAPH OR POLICY NO.	COMMENT
	 The riverside walk should link with the Bus Station site and Plottingham for connectivity. Public access to St Michael's Island is not desirable due to the sensitive wildlife habitats. As made clear in the Sustainability Appraisal Summary, the river provides "a habitat for species including the European protected Otter and Water Vole".
13.4.15	Bridport Town Council disputes this statement. No evidence has been presented to demonstrate that additional capacity is integral to the delivery of the wider scheme.

Sustainability Appraisal Summary August 2018

Bridport Town Council has the following comment in respect of the text relating to Policy BRID2 as drafted in the Sustainability Appraisal Summary August 2018:

Bridport Town Council requests that the text relating to Policy BRID2 (pages 127 to 128 in the Sustainability Appraisal Summary) be re-worded to read (changes shown in bold underlined):

In order to achieve the remediation of the 'high risk' potentially contaminated land site associated with the previous use of the land adjacent and to the north of the site as a metal works, foundry and water pumping station, the following text could be added to the policy:

"Development must avoid unacceptable risks to human health, property and the environment as a result of potentially contaminated land, for example as a result of the former industrial uses in the areas to the north of the site"

Development at this site will result in the loss of Grade II ('very good') agricultural land. Bridport is renowned for its local food production, and the loss of agricultural land on this scale is unlikely to significantly compromise this. However, the policy may recommend that <u>community gardens and</u> <u>an orchard are provided</u>, helping to support the local food and sustainable agriculture agenda and provide greater local food security. This would, in addition, help to extend the green network through Bridport and provide a new community facility.