

Bridport Town Council
Dorset Joint Local Plan - Consultation Jan-March 2021
DRAFT SUBMISSION

BTC would like to make it clear that the absence of a comment on any part of the draft Local Plan should not be regarded as approval or consent.

Strategic Response

Now, more than ever we need a democratic, functioning planning system to support communities in addressing a number of interlinked crises; the climate & ecological emergency, the housing affordability gap and inequalities in health, life expectancy and wellbeing.

The [RTPI](#) put it simply, *“the planning system often appears to deliver the wrong type of development in the wrong place, and does not fully consider the impact of development on carbon emissions. At the same time, spatial planning is tasked with responding to other priorities, such as housing delivery, nature recovery, flood risk, air pollution, and mental and physical health. They also include the challenges faced by towns and cities that, even before the Covid-19 pandemic, were struggling to adapt to structural shifts in the economy, consumer habits and lifestyle choices”*.

A functional planning system is one based on policies developed with communities, which have the potential to deliver positive outcomes for people, nature and our local economy – Good Planning is vital if we are to adequately respond to the climate and ecological emergency and deliver new homes that solve, rather than exacerbate, our housing crisis. This means placing truly sustainable development at the heart of the Local Plan ensuring that the planning system across Dorset delivers a sensitive balance of economic, social and environmental aims. Planning must now respond to new challenges and opportunities; supporting the economic recovery while tackling inequality, accelerating progress towards net zero carbon, building resilience and reversing habitat and biodiversity loss. New affordable housing must be located and designed in ways that achieve carbon neutrality, supported by the upfront provision of transport, utilities and green infrastructure – see [Plan The World We Need](#): The contribution of planning to a sustainable, resilient and inclusive recovery.

BTC supports the call from [Dorset CPRE](#) for a Local Plan that is achievable, deliverable and reflects and responds to local need. There is an unresolvable tension at the heart of the Draft Local Plan – prioritising economic growth predicated on coercing the release of development land for housing and infrastructure projects drives inequality and feeds the climate and ecological crisis. The ambitions set out on the Draft Local Plan seem to suggest all elements can be delivered equally – economic, social and environmental. Yet,

history tells us otherwise. Being target driven has merit but if incentives are only for housing numbers and land for economic development other critical objectives; nature and green recovery, will be relegated as priorities. BTC can only conclude that the Draft Local Plan perpetuates '*business as usual*' for another 17 years when we know we are faced with the urgent need to change to a net zero carbon economy by 2030!

On community engagement – BTC questions whether, in the rush to meet government requirements for housing supply, Dorset Council has allowed enough time and done enough community outreach to ensure that ordinary citizens are aware, understand and feel able to input to the Plan process. If the Government's White Paper proposals on the Future of Planning progress through parliament, plan development and design codes will become the only opportunity local people have to shape land use and development impacting on their communities.

On the economy – BTC supports the adoption of the '[Doughnut economics](#)' framework for sustainable development developed by Oxford economist Dr Kate Raworth. Shaped like a doughnut the framework combines the concept of planetary boundaries with the complementary concept of social boundaries. The framework was proposed to regard the performance of an economy by the extent to which the needs of people are met without overshooting Earth's ecological ceiling. Applied at the scale of a county a downscaled approach starts by asking: "*How can our county be a home to thriving people in a thriving place, while respecting the wellbeing of all people and the health of the whole planet*".

Some 21 million citizens in the UK live in small rural towns. Market towns, like Bridport, have the potential to be sustainable models for development see [Eco-Town model](#) – many of the ingredients for sustainable places can be found in Bridport; human scale, walkability, independent retail and a wealth of social capital.

We need to reinvigorate Dorset's towns and their relationship to people and nature by re-localising production so that towns are generative rather than extractive, restorative rather than destructive, and empowering rather than alienating, where prosperity flourishes, and people have purposeful, meaningful work that they enjoy, that enables them to use their passion and talent. We need to recover the knowledge and capacity on how things are made in our towns, by connecting citizens with the advanced technologies that are transforming our everyday life.

On sustainable development – BTC would like to see the Dorset Local Plan provide a clear and simple definition of what is understood by sustainable development. Many cities and regions are constructing their planning documents on models of sustainable development that are in tune with safeguarding planetary and social boundaries.

Embrace the 21st century goal. Aim to meet the needs of all people within the means of the living planet. Seek to align your organisation's purpose, networks, governance, ownership and finance with this goal. Expect the work to be challenging, innovative and transformative.

See the big picture. Recognise the potential roles of the household, the commons, the market and the state - and their many synergies - in transforming economies. Ensure that finance serves the work rather than drives it.

Nurture human nature. Promote diversity, participation, collaboration and reciprocity. Strengthen community networks and work with a spirit of high trust. Care for the wellbeing of the team.

Think in systems. Experiment, learn, adapt, evolve, and aim for continuous improvement, be alert to dynamic effects, feedback loops and tipping points.

Be distributive. Work in the spirit of open design and share the value created with all who co-create it. Be aware of power and seek to redistribute it to improve equity amongst stakeholders.

Be regenerative. Aim to work with and within the cycles of the living world. Be a sharer, repairer, regenerator, steward. Reduce travel, minimize flights, be climate and energy smart.

Aim to thrive rather than to grow. Don't let growth become a goal in itself. Know when to let the work spread out via others rather than scale up in size.

Taken from Amsterdam City Plan (2020).

Sustainability and economic growth are incompatible and will remain so while our economy and society is so unequal, wasteful and dominated by the profit motive. Until this changes, growth will inevitably mean increasing use of non-renewable resources, further unnecessary global heating emissions and ongoing damage to wildlife, soil, water and air quality. BTC argue that the word 'sustainable' should only be used where the action clearly poses no harm to the welfare and needs of future generations of humans and all other species.

On the climate crisis – The Draft Local Plan aims to ensure Dorset adapts to and mitigates the impacts of climate change – BTC is not convinced that focusing development in key towns and accepting renewable energy installations (with caveats about harm) is a sufficient or appropriate response. As a minimum BTC looks to the Local Plan to ensure;

- All new homes are built to zero carbon standards as soon as possible and by 2030 at the latest,
- Use and repair of existing buildings is encouraged,
- Nature-based solutions to enhance climate resilience are fully embraced.

BTC endorses recent research available from the [RTPI](#) that starts from the premise that there is a clear relationship between spatial planning and carbon, and that only a place-based approach can deliver net zero transport emissions and be a catalyst for better placemaking to deliver healthier, happier, more resilient communities. The RTPI report explores how different types of local area might go about reducing greenhouse gas emissions from surface transport by 80% by the year 2030.

On the ecological crisis – BTC looks to the Local Plan to better protect species and our most important habitats, with no reduction in the current level of protection, and active support for nature’s recovery from freefall decline by identifying new Highly Protected Areas and Nature Recovery Areas and strategically planning ‘nature recovery areas’.

The Local Plan is a land use planning tool that should define the area of Dorset required for ecological functionality and ensure a development doesn’t continue to erode vital ecological networks or public access to open space. The next iteration of the Local Plan must connect with and support changes being brought about by the Agriculture Act and Environment Bill to support rural transition.

On the housing crisis – BTC looks to the Local Plan to deliver enough quality affordable and social homes for rent to meet the local needs set out in the [Bridport Area Housing Needs Assessment](#).

As Dorset CPRE point out; “central housing targets put at risk our communities and environment. We all want a Local Plan to reflect genuine local housing needs and for the Dorset Council to be ready to justify a Dorset based approach to the planning inspectorate at public examination. Other councils have successfully made the case for locally appropriate housing numbers below central targets”.

BTC feels that Dorset is suffering from the imposition of national controls over housing land supply calculations. We await the Government’s response to the consultation on the use of the standard methodology and hope that some of the pressure on Dorset will be addressed – but the overriding tension remains; economic growth predicated on stoking the housing market cannot be reconciled with the climate and ecological crisis.

The housing crisis impacting on Bridport is in substantial part a product of a planning system and housebuilding sector that has become increasingly top-down, politicised and deeply inaccessible, with significant and deepening consequences. BTC looks to the Local Plan to steer an approach to the housing affordability crisis equal in ambition to the visionary housing projects of a century ago, that local people can afford to live in within sociable, safe and healthy neighbourhoods.

The Government's Summary of Responses to the consultation on the [Future Homes Standard](#) (Jan 2020) confirms that from 2025, the Future Homes Standard will deliver homes that are zero-carbon ready. The Government also confirms that it will not amend the Planning and Energy Act 2008, which means that local authorities retain powers to set local energy efficiency standards for new homes. BTC asks that the Local Plan aligns with the Bridport Area Neighbourhood Plan in seeking to set standards for new homes that go beyond the minimum required by Building Regulations.

On transport – BTC looks to the Local Plan to offer a bold vision for the future of Dorset Towns and in particular a more ambitious and future proofed approach to public transport issues. A strategic approach to transport provision should be informed by a full review of the Local Transport Plan 3.

Research by [RTPI](#) demonstrates the need for a comprehensive package of interventions to reduce transport emissions. The RTPI modelling takes a place-based approach which prioritises measures which reduce the overall need to travel, followed by those which shift trips to active, public and shared transport, and finally those which switch vehicles to cleaner fuels. By following this hierarchy, decarbonisation acts as a catalyst for reducing car dependency and creating healthier, safer and more equitable communities. By contrast, the switch to cleaner fuels only accounts for just over half of the necessary emission reductions, reinforcing the need for a 'do everything' approach.

On the future role of Local Plans given the Governments recent White Paper on Planning the Future. BTC fears that in the lifetime of the current Parliament we will see major changes to the planning system. This has the potential to derail or significantly re-shape the work being undertaken by Dorset Council on the Joint Local Plan. It is a difficult time for land use planning but BTC would like to offer support to Dorset Council in seizing what opportunities there are to plan for a more sustainable future for our rural communities.

Detailed Response
Section 1 - Introduction

Reference	BTC Comments:
Section 1	This section creates confusion by jumping about at random between the characteristics and economy of the county of Dorset and the Dorset Council part of that county. For instance in 1.3.4 the sentence starts with Dorset but clearly refers to the area covered by DC. Whilst appreciating that some themes or statistics are county wide, BTC suggests a need for clarity and consistency. One solution might be to consistently use the word Dorset only when referring to the whole county and to use 'The Council's area' or 'DC's area' at all other times. Or to consistently say 'the County of Dorset' when referring to that. It does seem as though the whole plan tends to use the word Dorset to mean Dorset Council's part of Dorset.
para 1.3.2	BTC would prefer use of median rather than average salary information. Average is distorted upward by very high earners.
para 1.3.15	BTC contests the definition of areas called 'sustainable locations' suitable for development. Much, if not most, of the population outside 'larger towns' live within a 15-minute drive of such a town. In contrast the 30-minute public transport travel time is irrelevant unless there is a high frequency service. BTC suggests this para should be deleted as it simply detracts from the other material in section 2.3 covering where development is acceptable. That says tier 4 is not normally acceptable for development yet most of these 15 minute drive hinterlands will be in tier 4.

Detailed Response

Section 2 – Strategy for Sustainable Growth

BTC supports the spatial strategy set out in the Local Plan and the focus on achieving a pattern for development that reduces the need for travel. BTC supports policies to concentrate housing and employment development in existing urban settlements with a preference for development on brownfield sites.

Reference	BTC Comments:
para 2.1.5	Add to the end of the second sentence <i>“and will play an active role in promoting a major offshore wind farm to be completed within five years of Plan adoption.”</i>
DEV 1	<p>It is rather dated to believe that X new jobs require Y hectares of new employment land. The shift to working from home will not be fully reversed in future. Also it is very foreseeable that we will move toward a four day working week and other work sharing arrangements which mean larger number of employees at the same premises (just not all at once!)</p> <p>On this and demand for housing land allocations BTC cautions against trying to cater for demands which are actually difficult to predict. A better approach would be a Plan that has flexibility and adaptability to respond to actual events.</p>
para 2.6.41	<p>In this ‘new settlement’ could never be sustainable unless it was large enough to support the bulk of services its population requires. That implies something approaching Bridport’s size.</p> <p>To restrain car use it would also need to be on high frequency bus and train routes and be designed to give cyclists and pedestrians priority within the settlement. Given the difficulty of getting any big project completed within a reasonable time scale this seems unrealistically ambitious. Piggybacking on an existing settlement would have a greater chance of success, rather as Poundbury has.</p>

Detailed Response

Western Dorset Functional Area

BTC agrees that the characteristics of Western Dorset justifies defining the area and Market Towns as separate from Central Dorset.

BTC encourages Dorset Council to be more creative and ambitious in defining the different functional areas and setting out a policy framework that supports sympathetic approaches to land use sustainability. It can't be right that all four functional areas operate to the same strategy – Housing and employment driven – The challenge for planning in Dorset is how to focus on sustainability, homes linked to small scale manufacture and farming.

Vearse Farm Urban extension

The Local Plan cements an expansion to Bridport at a scale not seen since the construction of Skilling, one of Britain's earliest examples of a neighbourhood built on Garden City principles which provided well-built, affordable housing in a healthy environment.

Development of this scale has the potential to not only provide housing that is needed, but to create good new jobs in growing industries, invigorate and build resilience in the local economy and enrich local community and civic life. But recent plans suggest the opposite is a real possibility, with new developments compounding existing issues of affordability, displacing local industry, further disenfranchising local communities.

BTC is a partner in the Raise the Roof Project to promote community discussion around what sort of housing future is needed in Bridport. The project is seeking funding for a second phase to further explore design solutions and prototype new local approaches to creating Eco Towns.

BTC have serious concerns to the proposal for 170 additional homes at Vearse Farm. An additional 170 Units would compound the challenge on the town to assimilate the urban extension and cope with the additional impacts on traffic and infrastructure.

It appears straightforward to add housing units to the existing allocation at Vearse Farm. However, in the view of BTC, the Vearse Farm Masterplan and supporting evidence is no longer fit for purpose and will impose serious transport and infrastructure pressures on Bridport Town Centre. BTC supports a rethink of the Vearse Farm Masterplan, informed by community consultation and the Raise the Roof project. This updating should be channelled through a Working Group of all development partners to guide the detailed delivery of a successful urban extension.

Alignment with Bridport Area Neighbourhood Plan

The Bridport Area Neighbourhood Plan was seven years in the making with over 120 community volunteers engaged in policy formulation. The BANP was approved by Dorset Council in May 2019. BTC would like to see closer alignment between the policies set out in the BANP with the emerging policies in the Local Plan. In particular, policy ambitions for the Centre Of Bridport - the re development of the Bus Station, Ropewalks Car Park as well as the treatment of Shop Fronts and approach to residential and community uses in the Town Centre.

Reference	BTC Comment:
36.2.1	<p>BTC suggests Local Plan vision for 2038 should be amended to read...."<i>Have addressed balance of jobs and housing</i>".</p> <p>BTC would like to see greater detail regarding how the Local Plan defines "<i>a low impact, sustainable town</i>" drawing on examples of Eco Towns.</p>
36.4.2	Reference should be made to the Centre of Bridport policy section of the Bridport Area Neighbourhood Plan; in particular Policy COB1 regarding 'Development of the Centre of Bridport'.
36.4.4	Reference should be made to current and potential impact on the High Street from the loss of retail banks. This para has an odd linking of finance, culture and the market and should be rewritten.
36.4.5	<p>Reference should be made to the Bridport Area Neighbourhood Plan assessment of the need for retail space in the Centre Of Bridport. Include cross reference with the Bridport Town Centre Health Check Report 2019.</p> <p>Comparison should be made with other struggling High Streets, highlighting their reliance on chain outlets which appear less beneficial than independent traders.</p>
36.4.8	Stronger commitment is needed to support use of space above shops for accommodation. The Local Plan would benefit from an overall policy to encourage addressing housing crisis through the renovation and conversion of existing buildings, in particular upper stories of Town Centre retail outlets.
36.4.8	Cross reference with Bridport Area Neighbourhood Plan Policies AM6 and COB2 to guide re-development of the Bus Station and Ropewalks Car Park.
36.4.11	The term 'holistic' needs definition and explanation. This paragraph would be more beneficial if it included a commitment to the provision of community buildings and spaces in the town centre.
BRID1 ii	Stronger cross reference with Bridport Area Neighbourhood Plan Policy AM4 on retaining 'roughly equivalent' car parking.

BRID2 36.5.3	BTC have serious concerns to the proposal for 170 additional homes at Vearse Farm. An additional 170 Units would compound the challenge on the town to assimilate the urban extension and cope with the additional impacts on traffic and infrastructure.
BRID2 36.5.6	Further clarification and evidence will be required to support the need for a 60-bed care home as part of the extension of development at Vearse Farm. In particular how this proposal sits with the current Care Village development in South Street and the policy to locate care facilities within 1km of the Town Centre.
BRID2 36.5.7	<i>"Only detailed matters"</i> this statement is dismissive of the importance of the detail to the Bridport community, including issues of access provision.
BRID2	<p>It is wrong to state that the additional housing provides for Bridport growth; the growth is for the entire Local Plan area and the policy statement should acknowledge this.</p> <p>Reference to the Miles Cross junction should specify a roundabout.</p> <p>Accessible and coordinated footpaths are needed. Concerned about the availability of green spaces in the development if Vearse Farm is developed further.</p> <p>The reference to allotments should be strengthened to stress the need for community food provision, a community farm as well as education and learning to address food security.</p> <p>Reference to bus routes ignores the reality that bus provision is reducing. This needs to link to a policy to improve public transport for it to be realistic.</p> <p>A new traffic/transport assessment is needed as the one used previously is demonstrably out-of-date. A masterplan already exists. This may need reviewing but the reference to providing one is out-of-date.</p>
BRID4 36.5.11	<p>Important to retain the character and culture of St Michael's. BTC support the opening up of access to the riverside as a key element of site redevelopment.</p> <p>Highlight the challenges of vehicular access to St Michael's, via narrow streets not designed for two way traffic.</p> <p>Stress importance of pedestrian/cycle links with the Vearse Farm development.</p>

BRID5 36.5.14	<p>This proposal is welcomed in principle. BTC wishes to stress the importance of adult social care provision.</p> <p>Vehicular, pedestrian and cycle access are key concerns. Safety issues for pedestrian access to the town centre must be addressed, particularly with a high kerb on the east side of South Street that presents a high risk to people using mobility scooters or with restricted vision. A crossing should be considered to avoid the need to use this stretch of pavement.</p> <p>Bus transport is needed to meet the needs of the development.</p> <p>Consideration should be given to accessible foot/cycle routes to the Medical Centre and through Asker Meadows.</p> <p>There is a need for a coherent masterplan setting out coordinated pedestrian routes to complement the cycle plan shown in the Neighbourhood Plan. This approach should be reflected at a strategic level in the Local Plan, at a Bridport level, and at a site level.</p>
BRID6 36.5.17	<p>BTC welcomes and supports the commitment to community-led housing initiatives. Given that the Co-Housing development is now being delivered, the information shown may need to be updated – for example it is unclear why the separate totals of dwellings (34 and 19 for phases 1 and 2) are needed.</p>

Detailed Response

Environment & Climate Change

There appears to be a mismatch inherent in the Draft Local Plan between the rhetoric about safeguarding and protecting the natural world and the policy ambitions and actions that are set out to address the ecological crisis.

The Dasgupta Report on Biodiversity for the UK Treasury (2020) concluded that there is a need for *“considerably better land-use planning and marine spatial planning, in the form of legally binding instruments, can help to provide a long-term framework for balancing the competing demands we make of our ecosystems”*.

The Local Plan needs to be strengthened to include SMART objectives for environmental outcomes – Government is increasingly looking to safeguard 30% of land area for nature. We would encourage Dorset Council to set out a long term framework for nature recovery as part of land use planning.

Net Gain

Net Gain in biodiversity has the potential to be transformative for Dorset nature. New infrastructure is one of the foremost drivers of biodiversity and wildlife loss globally, and the Local Plan commits to delivering housing and employment whilst safeguarding the rich natural assets of the county.

'Biodiversity Net Gain' represents an attempt to decouple new infrastructure from its impacts on nature. There are also widespread hopes that Net Gain will catalyse a new era of private sector investment in restoring nature, to generate certified biodiversity gains for the 'biodiversity unit market' that many expect will arise to deliver the biodiversity units that developers need to achieve their mandatory Net Gain requirements.

These are exciting and laudable ambitions. However, there has not yet been any systematic evaluation of what the impacts of Net Gain are likely to be in practice.

Reference	BTC Comments:
Fig 3.1	<p>Dorset's unique environments are very important and should be afforded a higher priority for protection and enhancement.</p> <p>The wording should be clear about the definition of "natural capital value", and that this is not a financial value.</p> <p>Environmental, social and economic benefits must be shown to go 'hand-in-hand'.</p> <p>The plan should acknowledge that the natural environment cannot be enhanced by development, only that the adverse effects can be mitigated.</p> <p>The aspiration to "minimise energy use" can only be achieved through zero carbon development. This reality should be reflected in the plan.</p> <p>There should be a requirement for all new housing and employment developments to incorporate renewable energy generation.</p> <p>The climate emergency mandates that the Local Plan should set new local environmental standards without waiting for changes to national planning legislation/regulations.</p>
3.2	<p>We welcome the inclusion of Bridport Leisure Centre as an important asset that needs continued support.</p> <p>Climate action is not purely an issue for open spaces and parks. It should underpin everything we do.</p> <p>Community farms should be specifically included in the 'other' category at Figure 3.2.</p>
3.2.5	Statement should refer to footpaths as well as cycle paths.
ENV1 i	<p>This policy should explicitly promote the 'brownfield first' housing policy.</p> <p>The commitment to addressing the climate emergency needs to be made stronger.</p>
ENV1 ii	BTC propose replacing the words "will be expected to" with "should".
Fig 3.3	<p>Any possible impact of Brexit needs to be incorporated and catered for here.</p> <p>No European Sites should be downgraded as a result of Brexit.</p>

ENV2 iv	The avoidance of development as the overriding approach is commended.
ENV2 vi	The terms “overriding public interest”, “no alternative acceptable solution” and “wholly exceptional reasons” need explanation and definition.
3.4.2	The ‘mitigation’ approach should be secondary to avoidance of development that harms biodiversity.
ENV3 i	The first sentence should be replaced with “ <i>Developers should not present proposals that cause harm to biodiversity</i> ”.
3.5	This section needs to link back to Dorset’s unique environment such that Dorset’s landscape is protected under the definition of “exceptional circumstances” for development purposes.
3.5.9	Food security should be incorporated into this policy and the supporting text. The plan should incorporate the qualities that led to AONB designation, and should link these qualities to policies to protect the landscape.
3.5.10	Replace “not conflict with” with “safeguard and enhance”.
ENV4	It is important for the plan to reflect that at every stage in the planning process, the public interest and exceptional circumstances tests should be considered.
ENV4 v	Greater protection of the AONB is required. We recommend a review of the Planning Inspector’s interpretation in respect of the Vearse Farm development, to guide the planning authority in better protecting the AONB. “Exceptional circumstances” and “public interest” require explanation and definition.
3.4.8	The idea that developers will monitor and maintain off-site compensation areas for 30 years is fanciful – The use of legally binding ‘Conservation Covenants’ might work but must be mandatory rather than voluntary as proposed.
3.5.10	Development proposals within AONB designated landscapes should be required to demonstrate how they will ‘ <i>enhance</i> ’ the special qualities of the AONB.
ENV5	The term “harm” is only applied to heritage aspects, and should also refer to harm to the climate. The balance between addressing climate change and preserving heritage should favour the former. In the context of the climate emergency, the need to preserve our future outweighs the need to preserve the past. This policy should be rewritten accordingly.

	<p>Alterations that enable preservation, continuing utility and future-proofing should be allowed.</p> <p>Bridport Town Council has encountered examples in recent times where solar panels and/or heritage double glazing on listed buildings have been refused in situations where the impact on heritage has not been sufficient to endanger future generations (e.g. WD/D/20/000888, 36 East St, Bridport).</p> <p>There will be no heritage to preserve if we do not preserve the environment, now.</p>
3.7.6	<p>It is BTC's view that the setting of the Jurassic Coast World Heritage Site would not be materially harmed by the proposed Navitus Bay wind farm. Impact on World Heritage sites should not be used disproportionately as a rationale to refuse vital renewable energy initiatives.</p> <p>BTC strongly supports wind farms as a vital contribution to the fight against the climate crisis. There will be no World Heritage Site to preserve and enjoy if we do not take advantage of renewable energy opportunities to avoid the predicted, catastrophic consequences of climate change.</p>
3.10.7/8	<p>These provisions are welcomed but heritage double glazing and solar panels should be added.</p>
Fig 3.5	<p>Increased emphasis should be given to addressing climate change. Applicants must be required to demonstrate future-proofing.</p> <p>Standards that address climate change and biodiversity should include a requirement to fit future-proofing measures at the outset, rather than to build in future flexibility to do so.</p> <p>Local standards must recognise the urgent need to address the climate emergency, and must accord with current best practice – not simply adopt current minimum requirements.</p> <p>The standards should accord with the Bridport Area Neighbourhood Plan design for living policy.</p>
ENV7	<p>The wording of this policy should be strengthened to include explicit recognition of the climate emergency and the urgent need to address it.</p>
ENV9	<p>This policy wording is wholly unacceptable. The future of human life is at risk and the maximum aspiration in the policy is "<i>high standards of environmental performance</i>". Current wording suggests that Dorset Council is either not willing to address climate change, or does not recognise the climate emergency at all.</p>

	<p>The policy needs a great deal of strengthening and must be more prescriptive about what standards to adopt and where these will be applied. Consideration needs to be given to adopting the BREEAM 'excellent' standard for new developments as in the Bridport Area Neighbourhood Plan Policy CC2.</p> <p>The policy should include specific reference to enhancements to existing buildings, particularly to listed buildings and buildings in conservation areas, so as to accord with the Town Council's comments on policy ENV5, and on paragraphs 3.10.7 and 3.10.8.</p>
ENV10	Stronger cross referencing with the more detailed policy HT3 on Shopfront Design in the Bridport Area Neighbourhood Plan Policy HT3 would better inform developers of requirements.
ENV11	<p>The Local Plan and/or supplementary guidance should include requirements for:</p> <ul style="list-style-type: none"> • Weight to be given to a town or parish council request for a construction management plan as a condition of planning permission; and • The relevant town or parish council to be consulted prior to the finalisation of construction management plan by the developer.”
ENV14(III)	The wording here is woolly and needs to give greater strength to the ability to obtain developer financial contributions. All planning applications should include a financial plan to show how maintenance requirements will be satisfied over the lifetime of the development.

**Detailed Response
Housing**

The Draft Local Plan seeks to deliver 30,481 new homes over 17 years – A housing challenge set by government targets provided through a standard methodology approach. Dorset Council has agreed to over-provide to give a buffer for sites that don't come to development and to take account of over spill need from Bournemouth/Poole. BTC challenges the view that the only pathway out of the housing affordability crisis is to build more market housing.

BTC agrees with Dorset CPRE on the need to re think the approach to housing in the Local Plan – a shift to one based on delivering local housing need not national housing want. In other areas, for example South Oxfordshire, legal challenges are being developed based on levels of housing numbers incompatible with meeting legal climate change targets.

BTC supports a focus on delivering the real housing need, one driven by inequality of access to homes resulting from local income affordability. In the Western Functional Area housing need is largely for social rent housing – [BANP HNA](#). BTC's preferred model is to deliver the affordable housing so desperately needed through a variety of mechanisms that have a track record for delivering local need. This might include; through Housing Associations, Council Housing and community led initiatives, CLTs, Co – housing and self-build.

Reference	BTC Comments:
4.1.3	<p>It is unclear how Dorset Council will work with town and parish councils.</p> <p>Reliance on private developers and the free market has been shown not to work in delivering affordable housing targets, and results in the overdevelopment of non-affordable housing and irreversible harm to the countryside. The Local Plan should champion community initiatives such as community land trusts and non- profit partnerships such as demonstrated by the Building Better Lives Care Village proposal.</p> <p>The document should define the <i>“development industry”</i>.</p> <p>The paragraph containing this term implies a hierarchy and a role for developers in determining local need, and would read better as <i>“We will work with the development industry to deliver the needs of town and parish councils, registered housing providers, community land trusts and local housing partners to deliver housing...”</i></p>

	The section on strong, healthy communities should include sustainable transport as a priority, and should emphasise the role of affordable housing and the housing mix.
HOUS1	<p>The impact of the pandemic demonstrates a shift in ways of working, especially home working. This might affect the design requirements for homes in terms of space, and location. Fewer people will need to live near urban workplaces.</p> <p>There is a difference between housing need and housing desire, and this should be highlighted in the policy, with need as the overriding priority.</p>
HOUS1 ii	20% is too low a figure. The minimum should be 50% with the aim of achieving 100% as the minimum standard should be achievable for all new builds.
HOUS1 iii	The statement regarding Neighbourhood Plans is welcomed as a positive step.
4.3.2	BTC agrees that there is a significant affordable housing need and this is reinforced in Bridport by the Housing Needs Assessment undertaken for the Bridport Area Neighbourhood Plan.
4.3.8	This statement is not acceptable. Affordable housing is very much needed on brownfield sites and the plan should be pursuing that aim.
4.3.17/20	<p>Stronger viability assessments are needed to prevent developers from escaping commitments to deliver affordable housing after consent has been granted.</p> <p>If a developer cannot deliver the required affordable housing in any given development they should not be bidding for the contract. The Dorset Council model should seek to reflect this.</p> <p>There is flawed logic in the assumption that smaller sites cannot deliver significant affordable housing.</p>
HOUS2 i	This clause is commendable.
HOUS2 ii	The need for different zones and proportions is not apparent and there should be scope for review of the requirements. The percentage figure for Zone 2 – and indeed all of the zones – should be 40%.
HOUS2 iii	This statement needs to provide clarity on how contributions will be spent and how the contribution is calculated. Where contributions are agreed due to a shortfall in delivery, spending of the contributions should be prioritised in the area where the affordable element has not been delivered.

HOUS2 iv	<p>Section 106 Agreements and viability assessments need to be more robust to prevent developers from escaping commitments to delivery of affordable housing after consent has been granted.</p> <p>If a developer cannot deliver the required affordable housing in any given development they should not be bidding for the contract.</p> <p>There is flawed logic in the assumption that smaller sites cannot deliver significant affordable housing.</p>
HOUS2 v	<p>The percentages shown here do not agree with the supporting text at 4.3.13. The policy should state 40% social rent and 30% affordable rent.</p> <p>1st bullet point – it is unclear what happens when under 30% is agreed. Any shortfall here must result in a compensating figure in affordable social/affordable housing. The shortfall should not be released to the open market.</p>
HOUS2 vi	<p>This policy is laudable provided the delivery of the affordable community-led housing target is not compromised.</p>
4.4.8	<p>The statement needs strengthening to address the concern that once affordable housing is lost to the open market there is no means by which it can become affordable again. Any sale must be prioritised for local need.</p>
HOUS4	<p>The need for affordable key worker accommodation is recognised and supported.</p> <p>The identified need should be evidenced.</p> <p>There is now a requirement for an updated needs assessment and the need for a 60-bed care home at Vearse Farm, Bridport should be reassessed taking account of updated findings.</p>
4.5.8	<p>The Building Better Lives initiative in Bridport is welcomed as a positive example and model.</p>
4.5.18	<p>Problems with adult social care are leading to bed-blocking in hospitals. The type of provision made needs to address this.</p>

HOUS5	<p>This policy needs to ensure that local need is addressed and that it does not provide an avenue for executive retirement homes instead.</p> <p>It is not sufficient to locate facilities on a public transport corridor, unless there is a demonstrable way of providing additional public transport on these corridors.</p>
HOUS6	<p>This policy must align with the Bridport Area Neighbourhood Plan.</p> <p>There should be a very clear focus on environmental issues in design standards.</p> <p>Clarity is needed in respect of the design standards to be adopted in relation to self-build/custom build.</p>
Principal Residency/ Second Homes policy	<p>A proposed policy for the Bridport Area Neighbourhood Plan was rejected due to a lack of supporting evidence, and we are not aware that relevant evidence is being collected by Dorset Council to better understand and define the issue of second homes.</p> <p>The approach adopted by the BANP is to gather evidence to inform future reviews of BANP. The Local Plan to recognise and support this approach.</p>
4.11.7	<p>The Town Council disputes the assertion that no additional transit provision is required. Our experience is that unauthorised traveller encampments are often as a result of a failure to provide transit pitches where travellers wish to stay, and that groups will not move to existing provision some distance away.</p>
HOUS10	<p>More local provision is needed for travellers seeking sites in the Western Dorset area. In some cases, groups will simply not move to designated existing provision due to it not being where they require; in others the transit provision is at capacity and therefore unavailable.</p>
	<p><i>NB there is no HOUS11.</i></p>
HOUS12	<p>Consideration should be given to new provision in Western Dorset.</p>

Detailed Response

Economy

Reference	BTC Comments:
ECON2	<p>This policy needs to support the development of the ‘green economy’, for example by preference for sites, developments and uses that are low carbon, and that re-use, repair and recycle.</p> <p>The policy needs to recognise and help address the overarching climate emergency.</p> <p>Any proposed use must seek to increase the overall carbon efficiency compared with the existing use.</p>
ECON3	<p><i>NB Numbering of policy and supporting text incorrect – references to 4.x should be 5.x.</i></p> <p>Consider aligning policies for Bridport town centre with the Centre of Bridport area as defined in the Bridport Area Neighbourhood Plan.</p> <p>This policy pays no attention to the climate emergency. Examples where ECON3 could assist in responding to the climate emergency include; supporting policies for Eco Towns, addressing food security concerns and a preference for local independent businesses.</p> <p>Bridport’s successful local independent offer must be protected and enhanced, and this policy needs to be adapted to enable that aim.</p> <p>The principle of this policy should be applied to the Vearse Farm development to ensure that any supermarket provision is in the town centre area.</p> <p>The policy as applied to Bridport should seek smaller units and mixed development. See BANP Policy COB3.</p> <p>The policy needs to link to parking provision. See BANP Policy AM3.</p> <p>The policy should promote non-retail and leisure uses to add value to town centres competing with online and out-of-town shopping.</p> <p>The policy should consider how it can help convert empty shops to community space, even if only temporarily.</p>

ECON4	<p>Impact assessments should include carbon/emissions impact.</p> <p>Cross reference with Bridport Area Neighbourhood Plan and Bridport Floor Area Survey 2018 set out in the supporting statement for BANP Policy COB3. Consideration should be given to the floor space ‘triggers’ for an impact assessment. 300m² is considered too large in the Bridport/ West Bay context where 91% of retail units fall below the government definition of small (<280 sq metres).</p>
ECON5	<p>Consideration needs to be made to align policies that apply to Bridport Town Centre with the area Centre of Bridport as defined in the Bridport Area Neighbourhood Plan.</p> <p>The introduction of a more flexible planning Class E give concern that influence over the future development of Bridport town centre is weakened.</p> <p>The use of upper floors of premises in centres for residential purposes is supported but should prioritise delivery of affordable homes.</p> <p>The area defined for Bridport Street Market should allow scope for expansion and should draw on the experiences and solutions used during Covid-19 restrictions.</p>
ECON6	<p><i>NB Numbering incorrect.</i></p> <p>Bridport town centre and West Bay are two important visitor areas, but the tourism development needs of the two destinations may differ. The sequential test defined in the policy directs tourism development to town centres which may not support sustainable development in West Bay.</p> <p>For Bridport and West Bay, the policy should give preference to development that respects local character and contributes to a successful and sustainable visitor destination. West Bay Discovery Centre is a good example of a successful re purposing of a heritage asset. There is a concern that the policy as drafted may allow for developments that are piecemeal and harm the special qualities of West Bay.</p> <p>The policy should address climate change and reference opportunities for ‘greening’ the economy.</p> <p>Impact on Conservations Areas should be incorporated into the policy.</p> <p>The policy should align with the Bridport Area Neighbourhood Plan.</p>

ECON8	<p>A mix of facilities is needed, in order to cater for different types of tourism.</p> <p>The policy should ensure that significant developments contribute (financially if necessary) to the sustainability of the local economy and local facilities.</p>
ECON10	<p><i>NB Numbering incorrect.</i></p> <p><i>Existing clause IV is missing text – it cuts off part way through a sentence. We would appreciate the opportunity to comment on the missing text.</i></p> <p>The policy should guard against the dilution of agricultural production, and against inappropriate alternative uses of agricultural land. It is not clear that the policy as worded will achieve this.</p> <p>The policy should be adapted to support the development of community farms and other sustainable local food initiatives.</p> <p>The policy does not reference the climate emergency and should be adapted to recognise the importance of agriculture to addressing climate change.</p>

Detailed Response
Community Infrastructure

Reference	BTC Comments:
COM1	<p>The policy should require developers to produce a viability assessment for community infrastructure provision.</p> <p>The policy should provide satisfactory transparency in the use of CIL funding, and should restrict the ability of developers from evading agreed community infrastructure responsibilities, and from altering agreed phasing of community infrastructure provision.</p> <p>The policy should include provision for monitoring the effectiveness of CIL and S106 in terms of actual outcomes for community infrastructure.</p>
6.3.3	<p>The Town Council agrees that development should be located on public transport routes, but the Local Plan, in conjunction with a proactive transport strategy should work harder to ensure that these routes actually provide sufficient public transport to offer a viable alternative to the car.</p> <p>The aim should be to reduce car use, rather than to avoid “<i>significant additional</i>” trips by car. This inadequate ambition is one example of a general failure in the document to recognise the severity of the climate emergency.</p>
COM2	<p>The policy should be drafted to deliver more community spaces that are needed in Bridport town centre for youth, families and the elderly.</p> <p>This policy should encourage use of vacant shops for community use.</p> <p>Support for Bridport Leisure Centre is welcomed.</p> <p>The policy should be adapted to ensure health and social care facilities are delivered, as these are not adequately catered for in current planning policy.</p> <p>The policy will not succeed unless public transport provision is enhanced. A transport strategy is needed to support this aim, from which the policy can flow.</p> <p>The aim should be to reduce car use, rather than to avoid “<i>significant additional</i>” trips by car. This inadequate ambition is one example of a general failure in the document to recognise the severity of the climate emergency.</p>

Figures 6.3 and 6.4	The document should include baseline assessments to show how any given area currently performs in terms of the provisions listed in these tables, and an assessment of accessibility of facilities using public transport.
COM4	A wider strategy is needed to support this policy so that future protection and coordinated development of facilities can be assured.
COM5	In order that we can comment fully on this policy, please clarify whether it precludes development of any new community facilities near to an existing hot food takeaway. The policy needs to demonstrate alignment with licensing policy in order to exert appropriate control over mobile facilities.
6.6.1	The phrase “ <i>reasonably close or accessible</i> ” is too loose and requires definition. Consider for example the potential effect of the Vearse Farm development. The wording needs to be strengthened to ensure viable access to education facilities.
COM6	<i>Bullet 2</i> – Vearse Farm is an example of a development that does not meet the requirements of this policy. Please note the lack of, and need for post 16/18 college and apprenticeship opportunities in Bridport, the effect of which is exacerbated by poor public transport links to the nearest alternative provision. Tertiary education in rural skills is needed in Bridport and across Dorset and should be catered for in this policy.
6.6.5	This policy should support the provision of an agricultural college in the Bridport area, and considers Vearse Farm as a suitable location.
COM12	<i>NB Numbering incorrect.</i> The policy should incorporate protection of biodiversity, such that access can be provided to utilities service infrastructure without damaging trees and other wildlife. The Council agrees with clause IV in principle, but the wording should cater for future changes in minimum standards. It is unlikely that FTTP will remain the minimum required standard for the life of the Plan. Provision of EV charging points should be provided as part of utilities infrastructure, or if not under this policy then elsewhere in the document.

Detailed Comments

Transport

BTC calls for a coherent transport policy to underpin the Local Plan. Dorset Council are scheduled to review Local Transport Plan 3 and the review must inform a comprehensive Transport Strategy to drive modal shift from private cars, promote active travel and address the poor availability of public transport. It is only by linking development permissions with a vision for future transport that sensible, sustainable development be expected from the Local Plan.

Reference	BTC Comment:
COM7	<p><i>NB Roman numeral numbering incorrect – no number ‘I’</i></p> <p>The policy needs overall strengthening, and must include a commitment to the provision of public transport and other non-car transport solutions.</p> <p>We need more buses and a more comprehensive, strategic public transport network to:</p> <ul style="list-style-type: none"> • Assist the climate emergency and reduce dependence on private cars; • Enable employment, learning and training opportunities for young people and • Enable keyworkers, patients and their visitors to attend hospitals and other healthcare appointments. <p>In addition, it rather shows a lack of commitment to the climate change emergency and provision of essential services that barely two pages are given over to this topic in the Local Plan.</p> <p>The concept of Eco Towns should be considered as a model for Bridport and other Dorset market towns, as a strategic objective in the plan from which transport needs will flow.</p> <p>A ‘hub and spoke’ transport approach should be considered and include reference to the Bridport Bus Station Transport Hub, BANP Policy AM6.</p> <p>There can be no coherent transport policy in the Local Plan until Dorset Council has reviewed Local Transport Plan 3 and established a revised comprehensive Transport Strategy to drive modal shift from private cars, promote active travel and address the poor availability of public transport.</p> <p>Re-regulation of bus services, and/or the need for subsidies should be considered alongside this policy.</p>

	<p>Location of development on a transport corridor does not deliver transport on that corridor, and too often there is insufficient effort by developers and the planning authority to address this issue. The policy should be strengthened to ensure that actual non-car transport solutions are delivered.</p> <p>The role of developer contributions (CIL, S106) should be included in the policy and given strength to ensure that non-car transport solutions are required and delivered.</p>
COM7 ii	Amend wording of last phrase to a more positive encouragement of walking and cycling.
COM7 iii	Amend first phrase from <i>"If viable new facilities cannot be provided"</i> to <i>"New facilities should be provided"</i> .
6.7.6	The sentence <i>"A lack of suitable parking can often cause concern and distress in a local community"</i> is too narrow a conclusion and does nothing to encourage non-car solutions. Suggest re-word or remove.
COM8	<p>This is a 'do nothing' policy that again fails to encourage non-car transport solutions. The policy needs be set in an overarching and comprehensive Transport Strategy for Dorset.</p> <p>The aim should be one car per household as an upper limit within a development, through development of associated transport services. Indeed, developers should be free to propose plans with no parking included, provided transport needs are demonstrably otherwise catered for. For example, Large housing schemes, like Vearse Farm, should encourage operation of Car Sharing Schemes.</p> <p>This policy needs to link to policies on public car parks and on-street parking, to ensure that parking provision is coordinated and to guard against parking simply being displaced from developments to other parking areas.</p>
COM10	<p>This policy is contradictory, in that it starts by encouraging low carbon and renewable energy development, and then applies restrictions on their delivery.</p> <p>On-site renewable energy should be the explicitly stated preference.</p> <p>Consider removing the bullet point items altogether, not least because these issues are already address by ENV policies.</p>

COM11	This policy acts as a deterrent to provision of renewable energy. The emphasis should be on encouraging renewable energy generation as the preference, with mitigation of harm a requirement rather than prevention of harm
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