

# Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (\*)

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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?\*

## Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation. \*

### Neighbourhood Planning Body / Parish or Town Council

If you selected other, please state the type of organisation

[Click here to enter text.](#)

Please provide the name of the organisation (if applicable)

Chideock Parish Council

## Chapter 1: Introduction

### Question 1

Do you have any comments on the text of Chapter 1?

Chideock Parish Council's statement of 10 October 2017 in the HNA Response: -

“Chideock Parish is a small rural parish in West Dorset, which is a district with a large Area of Outstanding Natural Beauty, characterised by small market towns and widely spread rural villages.

Chideock has a Conservation Area and many Listed Buildings. Being in a highly desirable area on the South West coast with the Jurassic Coast World Heritage Site, many properties are second homes and the high house prices are unaffordable for local working families. The second home property proportion is one of the highest in Dorset, and comparable to similar areas of Devon and Cornwall.

The village has a Parish Plan and a general information website, and the Parish Council participates actively in the Local Area Partnership.

In common with many small rural communities in the South West, Chideock has a major problem in the unaffordability of homes to local working families, who are priced out of the market by people purchasing second homes and properties for Holiday Letting. This has the secondary effect of removing homes from the housing stock and simultaneously pushing up the level of Private Rents.”

- Chideock Parish Council hopes that this NPPF response from a small parish with a need for local housing for affordable rent for local people will afford the Ministry some insight into the relationship between the NPPF, local plans, and the delivery performance of developers at the local parish or neighbourhood level.
- Specifically, as at October 2017 there were on West Dorset District Council Housing Register a total of 1548 applicants of whom 414 had a connection to the Bridport Neighbourhood Plan area. This is 26.74% of the total compared to a 15% proportion of the total population. At 1.78 times the District average, the indication is an overwhelming need for subsidised housing for rent at levels affordable to the local average wage, which is well below the national average wage.
- There is in process a large development of around 760 houses in the Bridport area, and there is deep concern that the proportion of affordable housing for rent will be not only inadequate to meet the 414 households in need but may be ultimately less than the initial quota as the developer argues viability, resulting in a higher proportion of the build being open market, unaffordable to those on local average wage.
- This is perhaps something that the National Infrastructure Commission should take on board and give considerable weight to.

## Chapter 2: Achieving sustainable development

### Question 2

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

**Yes**

Please enter your comments here

Chideock Parish Council agrees with the “interdependence” of the 3 objectives but is concerned at the implied priority sequence. There is concern that, in rural and coastal areas, insufficient weight is being given to protected areas, especially, in Chideock’s case, AONB adjacent to the Jurassic Coast World Heritage Site.

- The Parish Council is sceptical of the inclusion of the word “sustainable” in relation to a presumption for development, particularly since the first objective is economic, with environment apparently at the bottom of the list.
- The Parish Council also notes that the 3 objectives “are not criteria against which every decision can or should be judged”. The Parish Council very much supports the statement that planning policies and decisions “should take local circumstances into account” but notes that this is not part of paragraph 11.
- The Parish Council is particularly concerned about the use of the word “local”. The general understanding is that this is the LPA level, and not a parish, neighbourhood or town. In a two-tier local government structure, the LPA is a District / Borough, but where there is a single-tier unitary council there is concern that “local” will be taken to mean the entire unitary (often equal to a county) area, which is too large to encompass truly local distinctiveness.
- For unitary councils the Parish Council strongly recommends that “local” should mean “Ward” (or the equivalent) within the unitary authority and would like to see a clarification of the definition of “local” included in the text of the NPPF and included in the Glossary.
- Similarly, the Glossary omits a definition of the word “sustainable”, and the NPPF makes no reference to development that is Unsustainable, particularly in relation to social and environmental objectives, or in relation to local (parish or neighbourhood) objectives, especially in rural or coastal areas.
- Given a growing population, a growing demand for affordable housing, limited capacity of the big developers to deliver, and a limited supply of land, one of the ways to meet “the needs of the present without compromising the ability of future generations to meet their own needs”, will be to recycle Brownfield Land for residential development. This is another thing the National Infrastructure Commission should take on board and give considerable weight to.
- Chideock Parish Council strongly supports the emphasis on “opportunities to meet the development needs of their area” based on “objectively assessed needs for housing”. The Parish Council made several constructive comments on the Housing Needs Assessment in the October 2017 HNA Consultation “Planning for the right homes in the right places”.

### **Question 3**

Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

**Not sure**

Please enter your comments here

Whilst it seems at first glance to be sensible to disperse the “core planning principles” across other sections, there is strong merit, especially for easier comprehension by lay people representing the local community interest, in retaining a specific, easily identifiable list of principles.

#### Question 4

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

Perhaps communities should be given more time than the “two years or less” to protect the amount of painstaking voluntary local effort that has gone into producing a neighbourhood plan. This needs to be fully recognised as carrying substantial weight, and merits a minimum three year period.

### Chapter 3: Plan-making

#### Question 5

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

#### Not sure

Please enter your comments here

The Parish Council is concerned that strategic site allocations will not provide adequate levels of Affordable Housing for local people, or additional community facilities, and that developers have too much leeway to avoid affordable housing for rent quotas. The Council strongly suggests that affordable housing quotas or targets are explicitly included at strategic level relative to the need evidenced in the Housing Registers, for local plan delivery monitoring, and to ensure that developers do not avoid their obligations at the local level, and to ensure that there is no “post code” lottery on affordable housing delivery, especially homes to rent.

- The Parish Council welcomes a 15-year strategic plan period with 5-year reviews but is again concerned that plans must include provision for delivering both the forward need for affordable housing for rent, and for eliminating the backlog on the Housing Register in the first 5-year period, with penalties if not met.
- The Parish Council welcomes the prospect that Plans should “be shaped by early, proportionate, and meaningful engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees”. The Parish Council’s experience is that this works well in a 2-tier structure, where Districts / Boroughs are close enough to the towns, neighbourhoods and parishes, but may not work so well in a unitary structure where the strategy covers a much larger area and is liable to lose the vital meaningful engagement at community level.
- The Parish Council welcomes the “new approach to viability” and especially the clarity “about the contributions expected in association with development”. The

Parish Council has been involved in the local area, centred on Bridport, for the past 20 years, in initiatives aimed at delivering affordable housing for rent for local people. Regrettably the backlog of such housing need remains at much the same level as 2 decades ago, pointing to a need for increased delivery of subsidised affordable housing for rent over the first 15-year strategic plan period. The Parish Council would suggest that bonuses for the achievement of targets for such housing need to be a fundamental part of the process, together with significant penalties for failure.

## Question 6

Do you have any other comments on the text of chapter 3?

Chideock Parish Council notes that Neighbourhood Plans “should not promote less development than set out in strategic policies for the area” and strongly recommends similar formal obligations on developers to deliver on affordable housing targets, with these targets clearly separated into homes for rent and homes for sole or shared ownership.

- The Parish Council regrets that Neighbourhood Plans which do not promote development are not covered, and that the validity of Parish Plans, into which considerable community effort was poured, has been lost. Many rural and coastal parishes have no capacity for housing development, have no defined development boundary, but do have a need from time to time to reaffirm the basic community decisions and aspirations for social and environmental policies embodied in an original (Millennium) Parish Plan.
- The Council strongly suggests that “levels and types of affordable housing provision required” should be made explicit targets which must be met by both the LPA and developers. There should be both incentives for achieving targets within each 5-year strategic review period, and penalties for failure to meet targets, especially for developers. This requires clear constraints on the interpretation of “viability” where the LPA and the community hosting the development should have a final say.

## Chapter 4: Decision-making

## Question 7

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

**Please select an item from this drop down menu**

Please enter your comments here

The Parish Council sees no problem in making viability assessments publicly available. In this context the Parish Council would expect to see Parish Councils automatically sent assessments electronically and to have a significant weight of input. The Council welcomes the encouragement to carry out viability assessments at the decision-making stage and would expect Parishes to be consulted.

## Question 8

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

**Please select an item from this drop down menu**

Please enter your comments here:

The Parish Council supports the proposal that National Planning Guidance should set out the circumstances in which viability assessments would be acceptable. This would ensure transparency and avoid argument or doubt about the interpretation of “circumstances”. The Council also supports the principle that affordable housing targets, and quotas, for homes to rent in particular, should be enforceable by a combination of targets, achievement bonuses and failure penalties, especially for developers, and especially on large developments of say more than 70 units.

## Question 9

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

Chideock Parish Council sees greater public benefit in capturing increases in the value of large or multi-phased development, and a mandatory capture of the public share of increases in value over time is essential to safeguard the public interest and prevent default loss of public benefit to private developers. As with Neighbourhood Plans, where the principle is that they should not promote less development, so the same principle should be applied to developers that once a developer contribution has been initially agreed it cannot subsequently be reduced but may be increased. Relative to formal targets and quotas for affordable homes for rent, there should be a formal review mechanism to enable the LPA to identify and agree the increase in value, and automatically increase the contribution.

## Question 10

Do you have any comments on the text of Chapter 4?

Chideock Parish Council is concerned that an often-inflated price paid for land should not be the basis for land value, but rather, a realistic value must be based on the existing use. Increases in value must be shared between the private and public benefit.

- The Parish Council welcomes the revised text at paragraphs 41 and 42 encouraging early engagement and pre-application engagement with developers, where LPA staff will have the opportunity to concentrate attention on contributions and delivery targets. The Council welcomes the exhortation that LPAs “should” use

the full range of planning tools but would prefer a strong mandatory requirement for the maintenance and application of “Brownfield Registers”.

- The Council welcomes “better coordination between public and private resources” and to “deliver “improved outcomes for the community”, especially in relation to the making up of the shortfall in delivery of affordable homes for rent for local people, with incentives for delivery and penalties for failure featuring prominently in the engagement process.
- ENFORCEMENT is important at the local level, and the exhortation that LPAs should consider publishing a local enforcement plan” is welcome but does not go far enough. This needs to be a mandatory requirement, and the Parish Council would prefer Enforcement Action to be mandatory.
- Currently inadequate resources are allocated in LPAs under pressure for cuts in budgets or efficiency savings. Chideock Parish Council has a particular issue with RETROSPECIVE applications and Certificates of Lawfulness, which can be subject to abuse. As a deterrent, the Parish Council strongly recommends a much higher fee (say £1,350 rather than £135). This would also provide a valuable source of income to be hypothecated for enforcement action.
- Chideock Parish Council has a long-standing policy of automatically recommending Refusal of retrospective applications and CLUs, and recommends making this a mandatory MATERIAL CONSIDERATION to be applied to all such applications, to give weight to local inputs.

## Chapter 5: Delivering a wide choice of high quality homes

### Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

The encouragement of use of small sites appears to exclude windfall sites and the subdivision of larger sites. If the policy objective is to bring forward more “in-fill” sites and promote higher densities, then setting a target of 20% of all sites presumes the availability of a 15-year supply at least within the context of strategic policy. This is too prescriptive and likely to be unworkable.

- The Parish Council would be concerned that pressure to find small sites will result in development proposals that encroach on valuable urban and suburban green spaces, and would doubt the efficacy of setting a formal target when there is no apparent formality to setting targets for the delivery of affordable homes for rent for local people.
- A target for development of Brownfield sites based on a Register should be a separate policy regardless of site size.
- Setting a target relative to completely unrelated criteria such as number of sites currently allocated or proposed, which may already contain a proportion of small sites, or the overall target for new build going forward regardless of site size, appears to run counter to the evidence-based needs assessment as the fundamental basis for planning future housing development. This is undesirable,

not only because it is arbitrary and subject to challenge at the local level, but also because local communities are not included in the decisions.

- The Parish Council suggests a separate evidence-based target which identifies all potential sites within the LPA area, and allocates potential development in 5-year phases over the 15-year strategic cycle. On this basis there is no need for any arbitrary size limits, whether half a hectare or one hectare, since the LPA can rank potential sites according to the actual size developable. If this is done, it is then a small step to set a target based on density, local character and similar factors, for the number of houses to be developed on the site. This can then be the subject of local consultation.
- The Parish Council observes that sites up to half a hectare equate, depending on density, to around a dozen and a half or so houses, at which level affordable housing quotas may not apply depending on thresholds. The policy might therefore be to identify small sites which are suitable for mixed type and tenure development, with a requirement that 50% be affordable homes for rent for local people, or people with a local connection.
- Subdivision is similarly a separate issue. The ability of developers to stretch out large developments over a long period of time, and take the benefit of increased value over time, is not in the community or public interest, and might be avoided by automatic subdivision into smaller sites of perhaps 90 units, or a variable number agreeable to the developer for each phase, with a target for each site of the proportion of affordable homes for rent or shared ownership.
- The Council further notes that the new evidence and needs based methodology for calculating build targets only increases the annual build target for our LPA, West Dorset District Council, from the current Local Plan number of 775 per annum to 780 per annum.
- For rural and coastal areas with few large towns or intensive development, both historically and going forward, there is clearly a limit to the rate of needs-based housing development, acceleration of which will immediately come into conflict with protected designations, including AONB, and in Chideock's case, land adjacent to the World Heritage Site.

## Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

**Please select an item from this drop down menu**

Please enter your comments here

Chideock Parish Council agrees that where LPAs are failing to meet the targets for local need there should be a link so that bonuses are not paid where delivery falls below 85% or 75% of the target and suggests that penalties should apply in such situations. Linkage to the Housing Delivery Test seems to be a tangible measure to apply to failing LPAs.

- The proposal to allow a planning condition to bring forward development within 2 years could be made mandatory for large sites, where automatic subdivision could also be applied so that two-year phases roll out a steady supply of housing, always provided that each phase includes an agreed target of locally affordable homes.

### Question 13

Do you agree with the new policy on exception sites for entry-level homes?

**Not sure**

Please enter your comments here

Exception sites for entry-level homes suitable for first time buyers is acceptable where a local need is identified. It is essential that the highest possible proportion be offered for discounted sale or affordable rent, and this should be restricted by planning condition and reflected in property deeds in perpetuity, for people with a local connection. The proportion should be 100% unless the strongest case can be made that viability absolutely necessitates open market housing, in which case the proportion should be demonstrably the minimum for viability, with the LPA and the community having the last word on this.

- This is most significant for small local communities subject to excessive open market pressures from outside their area and elsewhere across the nation. It is essential for the in-perpetuity link to a local connection to be maintained to protect against long term loss to the competitive open market housing which simply renews the cycle of local non-affordability, driving younger local people out of their communities, with consequent loss of vitality.

### Question 14

Do you have any other comments on the text of Chapter 5?

A significant boosting of supply translates into a doubling of the current level of construction. This implies building out the current 5-year supply in 2 or 3 years and then doubling the 5-year supply pipeline for the remaining 10 years of a 15-year strategy. This is not likely to be achieved by prescribing a set percentage of small sites when the national capacity is unquantified. The capacity of the big private builders is likewise constrained, since typically they hold around 5 years supply of plots with planning consent, which could be built out more rapidly than their current business plans, presumably given a suitable incentive to change their business model, which does not at present produce rises in output as selling prices increase. The Big-ticket solution points to public acquisition of very large sites.

- A 10% target for affordable homes for ownership may prejudice output of affordable homes for rent, so a corresponding target to reduce the waiting list on Housing Registers needs to be introduced. Given that the ratio of average earnings to average house prices is at an all-time high, and is increasingly unaffordable, 10% is a modest starting level which may have to be increased annually, and certainly significantly in each 5-year review period over a 15-year strategic plan period.
- The exhortation to “consider the case for setting out policies to resist inappropriate development of residential gardens” is most welcome, and for clarity should refer to “inappropriate back land development” as well. Glossary definitions are essential.
- There is an overlap between entry-level exception sites and rural exception sites, and the requirement to “provide affordable housing to meet identified local needs” should be common to both, and given “substantial” weight.

- An alternative to “new Green Belt around new development” would be designated and protected “Local Green Spaces” (including aged and veteran trees), planned strategically round new development.

## Chapter 6: Building a strong, competitive economy

### Question 15

Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

**Not sure**

Please enter your comments here

The objectives for rural planning policies are commendable but need to sit in a context of firm protection of environmental designations, such as AONBs, which should be explicitly included in the test.

### Question 16

Do you have any other comments on the text of chapter 6?

The acknowledgement that “availability of sites to accommodate appropriate development in rural areas may be limited” points to a need to distinguish between small and large sites. Stronger protections might therefore be appropriate on sites greater than half a hectare, in line with the paragraph dealing with “identifying land for homes”.

## Chapter 7: Ensuring the vitality of town centres

### Question 17

Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

**Yes**

Please enter your comments here

Strengthening the sequential test “for main town centre uses” is welcome as is the exhortation to keep town centre boundaries under review, always provided that expansion of town centres should be set in the clear context of maintaining a contiguous, coherent, and identifiable town centre.

### Question 18

Do you have any other comments on the text of Chapter 7?

The assessment of office development impacts outside town centres should perhaps take into account the difference between high-rise and low blocks to protect the general local character of the particular neighbourhood.

## Chapter 8: Promoting healthy and safe communities

### Question 19

Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

Consideration of social and economic benefits of estate regeneration is welcome, as is the consideration of layout and design in promoting healthy, inclusive and safe places, so the funding of the appropriate infrastructure needs to be secured through development contributions, which should be prescribed in the text.

### Question 20

Do you have any other comments on the text of Chapter 8?

Assessments of the needs for open space, sport and recreation facilities are important, as is the need to protect existing open spaces. The role that a Local Green Space designation can and should play in protecting open space for the health and well being of the local community needs to be given great weight. The Parish Council has supported the principle of better design for living in previous planning policy consultations going back to the Millennium, and these principles underpin the Chideock Parish Plan, which should be given some weight.

## Chapter 9: Promoting sustainable transport

### Question 21

Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

**Yes**

Please enter your comments here

Consideration of all aspects of transport has always been vital, so the provision of travel plans based on a transport statement or transport assessment is the crucial,

key factor which should carry more weight as an essential, significant material consideration.

### Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

Yes

Please enter your comments here

Recognising the importance of a national network of general aviation facilities and their value to the nation and the economy is a good first step, but would benefit from a mapping and description of the current facilities as the basis for identifying strategic centres of excellence, and for planning transport connectivity on the ground so that people can easily travel to work, and perhaps use more public transport to do so, as well as walking and cycling.

- Underlying this is the general co-location of housing and work places which should feature as a major objective of any 15-year strategic plan to ensure a balance between housing and jobs.

### Question 23

Do you have any other comments on the text of Chapter 9?

Residual cumulative impacts of traffic on the local roads and highways needs much more precise definition, particularly in relation to severity. This ought to be an impact defined relative to a measure of congestion or overload which is not impossibly high.

- For rural areas, traffic impacts can be heavier due to greater reliance on cars. In this context, ever-reducing subsidies for bus services is a major concern for small rural parishes, and county / unitary authorities budgets here need to be increased.

## Chapter 10: Supporting high quality communications

### Question 24

Do you have any comments on the text of Chapter 10?

Chideock Parish Council was involved in numbers and locations of communications masts from before the Millennium and hosts a 30-metre mast at the top of Chideock Hill next to the A35 Trunk Road. One of the principle objectives was to ensure mast sharing to minimise the number of masts, including the police secure communications essential for security in rural areas.

- The exhortation to use existing masts for new capacity is commendable but might go further to require a new provider to demonstrate that the existing masts in the area positively do not provide coverage or an adequate signal, before justifying a new mast.

- In this context, self-certification is an inadequate protection.
- For fibre optic high speed broadband, the Parish Council notes that in a neighbouring parish to the west, in the rural Marshwood Vale, the whole village of Marshwood is connected directly to the houses by above-ground cables which share telegraph poles carrying existing power and telephone connections. The Framework might consider how a combination of both underground and over ground from an exchange could be used to extend high speed services to the Last small percentage of remote locations.

## Chapter 11: Making effective use of land

### Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

**Yes**

Please enter your comments here

The Parish Council continues, as it has done in past consultations, to support effective use of land subject to environmental safeguards which maintain existing protection designations such as AONB. This is a crucial part of maintaining the character of rural areas. In this context, use of Brownfield Land within existing settlements has a positive contribution to make to the construction of new build, always provided that, in rural areas, the outstanding local need is met first.

- While the concept of building upward extensions to create new housing units is sound, there does not appear to be sufficient distinction between making a new unit rather than extending the size of an existing unit. Giving “substantial weight” to the creation of new units might be a solution.

### Question 26

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

**No**

Please enter your comments here

The desirability of maintaining an area’s prevailing character is not strong enough for the protection of character in rural areas and villages and might be assigned “great weight” in such circumstances, again with a distinction between small sites (less than one hectare) and larger sites where a wider range of type and design is more sustainable.

- Similarly, for rural areas where there is high open-market demand forcing up prices and cutting local people on average local wages out of the market, minimum density targets will be inappropriate, and are just as likely to exacerbate the

affordability and availability problem for local people seeking to stay in their own community. There is a clear difference between “identified need for housing” which includes assessments of the open market driven by forces well outside a rural or coastal community, as distinct from local need by local people for affordable housing as recorded on the local Housing Register.

- “Optimal use of the potential of each site” needs to clearly distinguish between urban and rural, indeed suburban vs town centre, and again give weight to the difference between small and large sites, where different density standards need to be incorporated.
- Clearly, small sites in rural areas need to be more in keeping with the established settlement pattern, character and design, than larger sites which can sustain their own distinctiveness, so local character needs to be assigned great or substantial weight.

### Question 27

Do you have any other comments on the text of Chapter 11?

Increasing the intensity of use of land “where there is an existing or anticipated shortage of land” will not, in itself, double housing completions from the current level, particularly if the concentration of new build is in areas where demand is already high, and supply of land is inevitably limited.

- The link between jobs, housing, and the need to travel or commute is a key factor which is not being given sufficient weight. A long term and broader 15-year strategic policy needs to assess the current imbalances, and aim to locate or relocate jobs to areas where there are no land shortages, and house prices are lower. In this context, the planning of a “national network of general aviation facilities” with the Jobs / Housing balance in mind would signal a new, fresh approach, as a ‘pilot’ for other businesses and industries.

## Chapter 12 : Achieving well-designed places

### Question 28

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

The Parish Council very much supports design policies “developed with local communities so they reflect local aspirations” and “each area’s defining characteristics”. However, there can be great tension between continuation of predominantly ‘traditional’ (say 18<sup>th</sup> century) and the introduction of new “innovative” designs (i.e. 21<sup>st</sup> century), particularly in relation to extension of traditional properties which form an integral part of the character of the area.

- There have been instances where the local plan policies have been interpreted by planning officers to positively prescribe new 21<sup>st</sup> century designs and materials to distinguish new extensions to older existing properties and, apparently, to avoid a false or deceptive ‘repro’ look by continuing the traditional style, design and materials.
- The Parish Council would therefore like to see a clear distinction in the Framework between all-new construction in its own unique and isolated setting, and extensions, however large, to existing traditional properties. In the case of

extensions, it is recommended that “significant weight” be given to continuing and preserving the traditional style, design and materials.

- The Parish Council notes that “Building for Life” carries on from previous initiatives and consultations going back as far as the Millennium and suggests that the time has come to make an approved reference volume part of the material considerations, with “great weight” assigned.
- In this context, pre-application discussions involving Parish Councils, on behalf of the local community, should be a statutory obligation, with weight given to the local representations, and it is important to recognise the application of this principle to extensions, single isolated new build, small scale developments say under one hectare, and large developments.

### Question 29

Do you have any other comments on the text of Chapter 12?

The policy for refusal of “poor design” appears to be open to subjective decision, even relative to “character and quality” and “local design standards”. Chideock Parish Council would like to see “substantial weight” given to the local parish interpretation where there is a recommendation to refuse.

- Again, the mention of “cumulative impacts” leaves too much scope for disagreement and argument, where again the local interpretation might be assigned great or substantial weight.

## Chapter 13: Protecting the Green Belt

### Question 30

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are ‘not inappropriate’ in the Green Belt?

**Yes**

Please enter your comments here

Since before the Millennium the Parish Council has been active, in conjunction with other parishes and the wider South West area, in policies to protect and enhance Green Belt, as well as the recognition of equal status for AONBs to that afforded to National Parks. The exceptions for affordable housing based on “identified local affordable housing need” are welcome.

### Question 31

Do you have any other comments on the text of Chapter 13?

The Parish Council notes a contrast between the references to “brownfield land” in the consultation proposals document, and use of a broader phrase in the Draft Text of “land which has been previously-developed”, where there is scope for

much disagreement and argument on interpretation. The reference to “well served by public transport” seems to allow non-brownfield land in Green Belt to be used, and the “and / or” construct needs to be restated so that there is absolute clarity on the eligibility of such land, or not.

## Chapter 14: Meeting the challenge of climate change, flooding and coastal change

### Question 32

Do you have any comments on the text of Chapter 14?

Chideock Parish Council welcomes the new policy on sustainable drainage systems. Following the summer floods in the area on 7/7/2012 the Parish Council initiated a flood and drainage management plan for the valley in which the village nestles. The reservation, as always, is with the use of the word “should” rather than ‘must’ and the absence of a weight to give an incentive for developers to deliver.

- The operation of Coastal Change Management Areas is welcome.

### Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

Yes

The Parish Council has been involved in local projects for affordable housing for local people since 2007 but has found it difficult to persuade architects and developers to fully use “location, orientation and design” in new projects. Constraints centre on topography, the use of terraces to increase density and reduce cost, and a reluctance to use solar panels or grey water recycling, particularly in delivering low cost affordable rented housing.

- The Parish Council would like to see a national policy which makes installation of solar panels, particularly on affordable housing, a mandatory requirement. National technical standards could support this.

## Chapter 15: Conserving and enhancing the natural environment

### Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

**Yes**

Please enter your comments here

Chideock Parish Council very much supports the clarifying and strengthening of protection for areas of particular environmental importance but suggests that “substantial” rather than “great” weight should be given to the designated areas.

- The Parish Council further suggests that “great” weight should be given to protection of Heritage Coast and regrets that the comment that “major development within a Heritage Coast is unlikely to be appropriate” is too weak a statement and fails to limit development other than on exceptional circumstances.

### **Question 35**

Do you have any other comments on the text of Chapter 15?

One suggestion for how best to protect aged and veteran trees could be to require the incorporation of areas including such trees into a Local Green Space as part of the provision, particularly in larger developments, for such amenity. The Framework might go so far as to require the incorporation of such spaces into the overall layout and design.

## **Chapter 16: Conserving and enhancing the historic environment**

### **Question 36**

Do you have any comments on the text of Chapter 16?

The exhortation that heritage assets, and specifically World Heritage Sites, “should be conserved in a manner appropriate to their significance” is weak, so the Parish Council suggests a stronger requirement giving substantial weight to the default, as with National Parks, the Broads and Areas of Outstanding Natural Beauty, that, in a defined buffer zone around such sites, “planning permission should be refused for major development other than in exceptional circumstances”.

- For the Jurassic Coast World Heritage Site specifically, the Parish Council suggests that, since the site technically ends at the top of the cliffs bordering the shore or the equivalent, the Heritage Coast designation should be linked to the World Heritage Site and the same principles applied to the Heritage Coast as apply to National Parks, the Broads and AONBs to create a buffer zone in the WHS hinterland. Similar protections should also be extended to offshore development.

## Chapter 17: Facilitating the sustainable use of minerals

### Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

Moving text from the Framework to Guidance seems already to point the way to differentiating between Policy (which ought to be mandatory, using the word “must” rather than the weaker “should”), and Guidance (which at the end of the day can be ignored by planners).

### Question 38

Do you think that planning policy in minerals would be better contained in a separate document?

**Not sure**

Please enter your comments here

A separate minerals planning policy document would be useful if it allowed a more specific focus to emerge, but the separation out of additional topics such as waste and minerals will become less transparent and accountable to local communities, particularly since tier-1 authorities (counties or unitaries) are already much too remote from parishes compared the tier-2 district / boroughs.

### Question 39

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

**Yes**

Please enter your comments here

There is clearly a tension between the immediate local host area and the wider regional and national interests, in relation to oil and gas as well as minerals, to provide the supply that “the country needs”, from a “finite natural resource”. Insofar as National and Sub-National Guidelines provide a way of balancing the tensions in a form which is acceptable locally, they are a useful part of the tool kit.

- The principle tensions arise from bulk transport, which has an impact not only locally, but in a much wider area crossing counties within regions, so both the Framework and Guidelines should address the possibility of significant and substantial shift from road to rail for regular bulk transport, with great weight given to such a policy.
- In this context, forming separate documents for waste and minerals would be most useful if it allowed consultation across wider regional areas in terms of bulk

transport impacts which local parishes along the transport corridors could comment on.

## Transitional arrangements and consequential changes

### Question 40

Do you agree with the proposed transitional arrangements?

**Yes**

Please enter your comments here

The transitional arrangements appear to be reasonable in phasing in revisions which are not significant in extent or impact on housing delivery.

### Question 41

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Not sure**

Please enter your comments here

The Parish Council has not considered the impact of changes to the Framework on the Policy for Traveller Sites due to limited capacity to deal with consultations.

### Question 42

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Not sure**

Please enter your comments here

The same applies to changes in Policy for Waste.

## Glossary

### Question 43

Do you have any comments on the glossary?

The Glossary is useful but should perhaps include the definition of “Sustainable Development” at Chapter 2, paragraph 7, for completeness, with the clarification that this definition applies “at a very high level”. This of course begs the question of what definitions apply at lower levels?