

# Part B

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## Consultation questions

### Section 2: Vision and Strategic Priorities

#### 2.1. The Local Plan Vision

##### Question 1: Do you have any comments on the proposed vision for Dorset?

DWT is pleased to see the commitment to enhancing Dorset's environmental quality, including biodiversity, by 2043, however, the vision should state firmly that the natural environment will be enhanced not that we will simply 'seek to' enhance it. The vision should also use the term 'recover' as set out in the 25 Year Environment Plan. We also recommend that carbon reduction is strengthened by linking to the Paris Agreement. The sentence should therefore read:

We will reduce our carbon footprint **in line with the Paris Agreement** and ~~seek to~~ **we will enhance and recover** our natural environment.'

The later sentences commitment to 'real enhancements' for the natural environment is also supported though they should also be altered to be more inclusive of all valuable environmental assets and features, not just the largest, and include the commitment to accessible greenspace for people to enjoy. We also feel that the reference to the LNRS, though welcomed in the Local Plan, is not necessary as part of the vision which should remain at a strategic level. The LNRS is a tool that will enable Dorset to achieve this vision but the use of the LNRS is a means to an end, not an end in itself. Recommended amendments are:

The area's rich heritage, hedgerows, trees, **other habitats** and the character of the landscape will be ~~respected~~ **valued and retained** where development takes place.

~~The large areas of significance for Biodiversity will be protected and real enhancements to the natural environment will be realised, guided by the Local Nature Recovery Strategy, to ensure that in 2043 Dorset supports more wildlife and that in all areas accessible natural greenspace is within easy reach.~~

#### 2.2. Strategic priorities

## Question 2: Do you have any comments on the proposed strategic priorities for the Local Plan?

### Communities for all

DWT support this priority but the supporting text in para 2.2.5 should specify access to *natural* green space. Access to nature provides significant wellbeing benefits and contributes to healthy communities. Recommended text reads:

### Responding to the climate and nature emergency

DWT support the priority but the final sentence should be strengthened to focus on 'reversing' nature's decline rather than just 'halting' it. It is essential through the lifetime of this plan that Dorset is able to demonstrably improve the condition, quantity and connectivity of wildlife-rich spaces across the county. Recommended text reads:

Addressing the climate and nature emergencies will protect lives, livelihoods, and ecosystems. The Local Plan has a role to play in helping tackle climate change and by supporting nature recovery at a local level. In doing so, we can strengthen community resilience, protect and support health and wellbeing, and stimulate economic growth, by focussing on ~~halting~~ **reversing** nature's decline and being prepared and resilient for climate change.

The supporting text in para 2.2.6 should be amended to reflect the mitigation hierarchy. It is not appropriate to simply 'mitigate' impacts from development. In the first instance measures must be taken to avoid impacts, then minimise impacts by appropriate site allocation and design, before mitigating for residual impacts.

Likewise, design and construction should seek to avoid and minimise the impacts that the new development will have on climate change through meeting zero carbon standards, improved energy efficiency, use of more sustainable resources, reduction of water use and incorporation of renewable energy as well as mitigating and adapting to the impacts of climate change. Paragraph 2.2.6 should therefore read:

Through managing where and how development takes place, the Local Plan will minimise the distance people need to travel and encourage active travel and use of public transport. Measures will be required to **avoid, and minimise the risk of impact** ~~mitigate impact~~ from development on important ecological sites as well as **mitigate any residual impacts** and improve biodiversity, guided by the Local Nature Recovery Strategy to ensure spaces for nature are bigger, better and more connected. Design and construction that **minimises the contribution of development to climate change, such as achievement of zero carbon standards, improved energy efficiency, use of more sustainable resources, reduction of water use and incorporation of renewable energy must be used. Measures that** mitigates the impacts of climate change will **also** be integrated into new developments. The impacts of climate change will be reduced by avoiding areas at risk of flooding & coastal change, **reducing water consumption** and incorporating green infrastructure (including space for biodiversity) into developments.

## **Section 3: The strategy for sustainable development**

### **3.2. The Strategy for Dorset**

**Question 3: The proposed settlement hierarchy lists the towns and villages that will be the focus for new homes. Are there other settlements where we should plan for new homes? Do you have any comments on whether a settlement is in the right Tier or not?**

DWT has concerns about the settlement hierarchy, particularly in East Dorset. This part of Dorset, as well as supporting the greatest existing urban pressures, also supports some of the most sensitive habitats and sites including the vast majority of Dorset's internationally important heathlands. Maximising large-scale development in the locations between Lytchett Matravers and Longham will have cumulative impacts further increasing pressures on these most sensitive habitats and causing greater disconnection between remaining fragments and also isolation from the New Forest SAC and SPA. Taking this approach, the more development that occurs, the more likely future development proposals will fail the Habitats Regulations Assessment and Sustainability Assessment tests rendering it undeliverable and reducing the ability of Dorset to deliver the nature recovery outcomes of this plan.

New settlements are mentioned in para 3.2.9 but it is not clear whether this longer-term strategy is proposed for the timescale of this local plan.

It is also not clear how allocated sites and scale of development is linked to the settlement hierarchy at present as e.g. Lytchett Minster and Lytchett Matravers are listed in Tier 3 but appear to have the largest potential scale of development associated with them in the East Dorset area and Crossways is treated similarly in the Central area.

### **3.3. South Eastern Dorset area**

#### **Question 4: Do you have any comments on the proposed strategy for the south eastern area?**

As mentioned above, and recognised in para 3.3.2 this area, as well as already being most impacted by development, also supports the greatest concentration of sensitive sites. As well as the national and international heathland sites, smaller fragments providing connectivity between these sites are designated as Local Nature Reserves (LNRs) and by local recognition as Sites of Nature Conservation Interest (SNCIs) as well as being connected by undesignated habitat forming part of Dorset's Ecological Networks and should be mentioned as their loss will also impact on the associated designated sites. These local sites and habitats also include grassland and woodland which contribute to an important mosaic of habitats supporting a greater diversity of wildlife than the designated sites alone could.

It is vital to recognise that these sites, the landscape and heritage coast are of significant importance for the local area, being of significant economic value as well as for quality of life and wellbeing for those who live there. Rather than just being constraints, preserving their integrity and the value of these sites is essential to maintain those benefits they provide for those who live and work in the area now and in the future.

It is clear therefore that prioritising proximity to existing facilities and reduced need to travel in East Dorset is in direct conflict with the need to maintain the value of these settlements as high quality environments to live and work.

It is essential to balance the need for new housing development in sustainable locations with the need to allocate space for nature and accessible greenspace in a strategic way rather than directly associated with development to ensure it is not fragmented and discontinuous. The Green Belt in South East Dorset also has a significant role to play in providing a buffer and SANG function in some areas for the Dorset Heathlands; release of Green Belt should not be considered where it will impact on these functions. If the proposed housing development in East Dorset is not delivered in such a way that ecological corridors can be maintained and the resilience of heathland sites is further weakened this is not sustainable. We recommend that more strategic SANGs are needed to ensure that development can be balanced with strategic non-development of appropriate land. See also our response to Q39 and to proposed allocation sites in Corfe Mullen and Wimborne in relation to this need.

#### **3.4. Central Dorset area**

## **Question 5: Do you have any comments on the proposed strategy for the central area?**

As above, para 3.4.2 should also include reference to locally recognised sites including LNRs and SNCIs as well as the ecological networks that connect them. Maiden Castle is an SNCI supporting valuable unimproved chalk grassland as well as a significant heritage asset and River Frome is also a SSSI west of Dorchester and last assessed to be in unfavourable-declining condition so as well as a constraint in terms of flood risk there are also opportunities to improve its condition and enhance it to deliver biodiversity and landscape benefits.

## **3.5. Northern Dorset area**

### **Question 6: Do you have any comments on the proposed strategy for the northern area?**

Para 3.5.2 should include reference to the significant role of locally recognised sites in the rich environment given the relatively fewer nationally and internationally designated sites. These comprise woodland, calcareous and neutral grassland of importance in Dorset and therefore contributing significantly to natural heritage and biodiversity of the area.

## **3.6. Western Dorset area**

### **Question 7: Do you have any comments on the proposed strategy for the western area?**

Para 3.6.1 should include reference to the Jurassic Coast here as well as Dorset National Landscape as for the central area. It should also include reference to the ecologically important international, national and locally designated sites comprising the Sidmouth to West Bay and West Dorset Alderwoods SACs, the West Dorset Coast as well as extensive grassland and woodland SNCIs.

## **3.7. Infrastructure Delivery**

**Question 8: Is there any important infrastructure that needs to be delivered alongside new homes in the Western/Central/South Eastern/Northern area?**

As highlighted above, it is essential to balance the need for new housing development in sustainable locations with the need to allocate space for nature and accessible greenspace in a strategic way rather than directly associated with development to ensure it is not fragmented and discontinuous. If the proposed housing development in East Dorset is not delivered in such a way that ecological corridors can be maintained and the resilience of heathland sites is further weakened this is not sustainable. We recommend that more strategic SANGs are needed to ensure that development can be balanced with strategic non-development of appropriate land. See also our response to Q39 and to proposed allocation sites in Corfe Mullen and Wimborne in relation to this need.

The plan should identify the need for green and blue infrastructure as well as grey infrastructure and address both needs in parallel. In many cases, nature-based solutions such as bioswales, green roofs, rain gardens and hedges and native planting schemes can be used in place of or alongside traditional grey infrastructure and opportunities for incorporation into development should be prioritised. Green infrastructure can support and supplement transport infrastructure, improving quality of the built environment and visual amenity and benefitting quality of life and wellbeing for Dorset's residents.

Natural England's Green Infrastructure Framework standards can be used to guide delivery of high quality green infrastructure and includes guidance on the integration of green infrastructure policies into Local Plans: [Green Infrastructure Home](#)

## **Section 4: Housing Delivery Strategy**

### **4.2. Local Housing Need and Housing Delivery**

## Question 9: The Local Plan sets out a strategy to meet the area's housing needs through

DWT has no further suggestions for additional measures to help meet housing needs but feel it needs to be emphasised that continued development on the scale proposed cannot be sustainable. If the Local Plan is not up front about the scale of this challenge and does not set very ambitious goals around addressing climate change and biodiversity loss, then these problems will be locked in for years to come leaving future generations with an even bigger crisis which today's decision makers will not be thanked for.

In our response to the 2021 Local Plan consultation we identified that it would be a significant challenge to balance the Planning Authority's Biodiversity Duty (Environment Act, 2021) with the level of housing and continuing expansion of development proposed then. As the consultation document identifies, the housing need figure obtained by the new Standard Method will require a more than 80% increase in the number of homes being delivered over the lifetime of this plan. In Dorset Council's response to the Government consultation on the NPPF in 2024 it was recognised that the housing targets imposed at the time of the 2021 Local Plan consultation were unrealistic. To a greater extent than before, it is difficult to see that it can be possible to achieve this level of change without leaving it impossible to meet climate change targets or reverse the loss of nature, with the inevitable result that Dorset will become less special.

Para 1.5.4 identifies that "One of the key approaches to addressing climate change is managing the location where development takes place. By focusing development on those locations where the need to travel is minimised and where sustainable travel options exist, greenhouse gas emissions can be reduced." A parallel approach must be taken to minimise the impacts to biodiversity. It is essential that development based on minimising need to travel is not allowed at the expense of existing local resources for wildlife and nature. Safeguarding existing natural habitats and creating and restoring new natural habitats will also have a significant role in addressing climate change.

While we support the intention set out in para 1.5.4, it is disappointing to see no reference to any tools to ensure that high opportunity areas which have biggest potential for benefits for biodiversity and climate are identified and retained, to provide a core network for nature to be connected and extended.

Though para 1.5.10 correctly states that the LNRS does not restrict development, DWT consider that policies within the Local Plan should and must seek to restrict development to some extent, informed by the LNRS where appropriate. Areas with the highest existing value and potential for nature should be identified to be less suitable for development to ensure well connected networks for nature across Dorset and to halt ongoing losses to biodiversity. It is far easier to deliver high value habitats, create corridors for wildlife and deliver biodiversity uplift in areas where some value for nature already exists rather than attempting to create these from scratch. As we identified in our response to Q4, it is essential to balance the need for new housing development in sustainable locations with the need to allocate space for nature and accessible greenspace in a strategic way.

Para 1.5.10 also refers to the need for the majority of developments to achieve 10% Biodiversity Net Gain. We emphasise that this is a legal minimum under the Environment Act and not a limit, the plan should encourage development that delivers more. Dorset could and should aim for better, and consideration should be given to whether 10% is sufficient in relation to the anticipated level of development proposed.

allocating sites for new homes, the flexible settlements policy, new settlements and the efficient use of land. Are there any other measures could help to meet housing needs?

### 4.3. Housing supply

**Question 10: To what extent do you agree or disagree with the Plan including a lower housing target for the first few years and a higher figure towards the end of the plan period to meet housing needs?**

- a. Agree
- b. Disagree
- c. I have another suggestion

This is appropriate given the challenges which will be encountered in attempting to rapidly increase rate of housing delivery and the need to rethink how housing is approached. Frontloading housing delivery ahead of ensuring appropriate provision of SANGs, integration of wildlife corridors and habitat restoration will accelerate loss of nature without securing the strategic need for a coherent nature recovery network.

The recent housebuilding report from Key Cities ([Turbocharging-housebuilding-Key-Cities-report.pdf](#)) identified that the biggest challenges to delivering development are cost and finance, land availability, developer delays and skills shortages. Although this reports analysis is particularly focussed on cities and urban areas, the Key Cities network includes BCP Council and all these factors will also apply to the more rural areas of Dorset as well as the more urbanised areas in the east. The Local Plan aims to address land availability but will not address any other factors which contribute to these challenges, all of which will need to be met to significantly increase the rate of housing delivery.

As we have identified in our response to Q9, DWT have serious reservations about Dorset Council's ability to deliver the level of growth outlined, without significantly compromising the ability to meet climate and biodiversity targets. A lower housing target in the earlier years of the plan will at least provide more breathing space to allow measures to combat climate change and to promote nature recovery to be secured and delivered in advance of impacts from development being realised.

### 4.4. Meeting housing needs of specific groups

**Question 11: Where should a policy allowing sites for only affordable homes apply?**

- a. All of Dorset

**b. Only around those towns and villages listed in the proposed settlement hierarchy**

**c. Only in the Green Belt**

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## Section 5: Flexible Settlements Policy

### 5.2. Proposed approach – Flexible settlements policy

**Question 12: We have suggested that the Local Plan will not include clear boundaries to define the edges of towns and villages. Instead, the flexible settlements policy would allow new homes to be built around certain towns and villages. How much do you agree or disagree with this approach?**

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

**Please provide any further comments or reasoning...**

DWT disagree with this proposed approach, the removal of defined settlement boundaries will introduce significant uncertainty regarding the distribution, quantity and sustainability of development in Dorset over the lifetime of this plan. This would be contrary to the purpose of a plan-led approach which enables the future of Dorset to be understood, accurately projected and supporting policies and actions delivered to ensure the sustainability of future development. DWT are concerned that these sites would not be subject to the same scrutiny as sites that have been allocated through the Local Plan process.

In addition, the Sustainability Appraisal supporting the local plan identifies that “*a Flexible Settlements approach could have potentially **significant negative effects** on all environmental SA objectives*”

Current planning policy in most of Dorset allows some development outside settlement boundaries if it can demonstrate that it meets other policy requirements and meet a high standard in evidencing need and suitability of the proposed location. These must be adjacent to existing settlement boundaries and retention of defined settlement boundaries will provide an important framework for assessing the suitability of development proposals and ensuring that future development will continue to meet the sustainability requirements over the course of this plan period.

The plan could seek to identify potentially acceptable areas for development outside the settlement boundaries but this should be planned for so that it can be addressed within the Sustainability Appraisal undertaken for the Plan.

### 5.3. The scale of development

**Question 13: We propose that the flexible settlements policy will include a limit of 30 homes per site. To what extent do you agree or disagree with this threshold?**

- a. The limit of 30 homes is about right**
- b. There should be less homes**
- c. More homes per site should be allowed**

**Please explain your reasoning**

DWT consider that the limit must be proportionate to the size of the existing settlement and the level of services and infrastructure that can support additional dwellings. We agree it must be no more than 30 for the largest towns.

#### **5.4. Number of sites at each settlement**

**Question 14: At a town/village, should one flexible settlement policy site be started, before another one is permitted?**

- a. Yes**
- b. No**

**Please provide any further comments**

The proposal considered, but dismissed, in para 5.4.1 to limit the number of sites permitted around a particular settlement, along with formal identification of potentially suitable sites which have been subject to a sustainability assessment as part of the plan-making process is a reasonable way to address some of the concern we highlight in our response to Q12. In order that a sustainable plan-led approach to development can be secured, defining a quantum and location for potentially suitable development outside settlement boundaries should be part of the plan and described on a settlement by settlement basis.

If however, the flexible settlement policy is taken forward as outlined, we agree it is essential that developments must be delivered before further consents for subsequent adjoining development can be considered.

#### **5.5. Settlements where the flexible settlements policy would apply**

**Question 15: We have suggested that the flexible settlements policy will only apply to the areas around certain towns and villages, these are those ranked as 'Tier 1, Tier 2 or Tier 3' in our settlement hierarchy. What do you think about the locations where we have suggested that the flexible settlements policy should apply?**

Under the proposed flexible settlements policy as drafted, the scale of potential development at each of the settlements listed cannot be known. Our concerns highlighted in our response to Q12 and Q13 apply. However, if Dorset Council are minded to take this policy forward, we agree that the flexible settlements policy, or other policy allowing development outside defined settlement boundaries should apply only to specific settlements where this has been identified to be appropriate and sustainable, with reference to the need to take into account securing provision of land which will contribute to maintaining and enhancing connectivity for nature.

## **5.6. Continuous built-up areas and edge of continuous built-up areas**

**Question 16: We have suggested that the flexible settlement policy should only be applied around the 'continuous built-up areas' (i.e. 'densely populated areas with high concentrations of buildings, infrastructure and paved roads') of certain towns and villages. Do you have any comments on our definition of this 'continuous built-up area'?**

We disagree with this definition because this will represent an ever-changing baseline if the flexible settlement policy is taken forward. Retaining the concept of defined settlement boundaries provides a baseline against which future development can be assessed and these can be revised if necessary through plan-making processes and appropriate consultation.

## **5.7. Green Belt**

**Question 17: We have suggested that the flexible settlements policy should not be applied in the Green Belt. What are your thoughts on this?**

The Green Belt in South East Dorset has a significant role to play in providing a buffer and SANG function in some areas for the Dorset Heathlands; as well as maintaining some degree of connectivity and green corridors through the extensive urban areas of east Dorset. Development outside settlement boundaries within the Green Belt should not be considered where it will impact on these functions. If the proposed housing development in East Dorset is not delivered in such a way that ecological corridors can be maintained, and the resilience of heathland sites is further weakened, this is not sustainable.

## **5.8. Approach to countryside development and urban intensification**

**Question 18: Away from the towns and villages listed in the settlement hierarchy, there may be types of development that we could support. Do you have any comments on this approach and on the types of development that could be supported in the countryside?**

DWT consider that appropriate development that allows farm diversification and nature recovery should be supported where appropriate.

## 5.9. Neighbourhood plans and the flexible settlements policy

**Question 19: We have suggested that the flexible settlements policy should not be applied in places with a recently made neighbourhood plan which includes allocations for new homes. What are your thoughts on this?**

As we have stated in our response to Q12, DWT do not believe the flexible settlements policy is appropriate or meets the requirement for sustainability and the local plan should instead look to allocate suitable sites for development in sustainable locations through the plan-making process.

Neighbourhood plans have been through a consultation process and should be respected whether or not they include housing allocations. Where housing allocations have not been made in recent neighbourhood plans, allocation of further housing sites is likely to have been found to be inappropriate, either through lack of need in that location or unsustainability of the options. Recently made neighbourhood plans therefore should not be over-ridden.

Future neighbourhood plans may bring forward proposals for housing allocations which will be subject to the same consultation process and subsequently identify sites suitable for development.

## **Section 13: Strategic Heathland Recreation Mitigation**

### **13.1. Background**

**Question 39: We have identified opportunity sites which could deliver more homes to help meet Dorset's housing needs. Do we need to change the approach to mitigating impacts on protected Dorset Heaths habitat sites as part of planning to meet increased housing needs?**

- a. Yes**
- b. No**

## Please provide further comments or reasoning.

DWT have supported the strategic approach to heathland mitigation applied since 2007 and welcome the review undertaken by Footprint Ecology in 2022 to assess its effectiveness. The existing approach must not be weakened in any way, however, we agree with the conclusions of the Dorset Local Plan HRA Report (Footprint Ecology, 2025) that the strategic mitigation schemes will need to be updated to ensure that appropriate strategic mitigation can be secured for the scale of development coming forward in Dorset over the lifetime of this plan.

As the HRA and the consultation document (p68, para13.1.1) identify, recreational pressures from residential development are not the only pressures from development that cause harm to heathlands with general urban effects including light, noise, dust, predation from domestic cats and spread of invasive species. These can also apply to employment sites as well as residential development. The result being that sites which have increasing urban pressures around them also become less resilient, such that they are less able to support even existing visitor pressures.

The level of development proposed as part of this plan also means that the effect of development within the 5km zone will further isolate and reduce opportunities for connecting designated sites, local sites and functionally linked land with consequential knock-on impacts on mobile species. For example, the HRA identifies numerous sites in Appendix 3 which have the potential for likely significant effects due to impacts on functionally linked land for Nightjars. This functionally linked land, though it may not have significant intrinsic value for mobile species such as Nightjar, may still represent a significant barrier and result in reduced mobility and isolation of populations if extensively developed. Survey work for a recent planning application in Dorset showed that even intensively farmed maize fields can be important foraging areas for nightjar. Extensive development, particularly in relatively close proximity to designated sites may represent a significant barrier and result in reduced mobility and isolation of populations.

The heathland mitigation review by Footprint Ecology showed no significant change to visitor numbers to heathland sites overall, but also confirmed that access levels had increased on some sites despite development levels not being greater in their vicinity. In 2022 this reflected a 6.5% increase in dwellings within the 5km zone. The consultation document identifies that at the time of the review in 2022 BCP and Dorset Council estimated an increase in new homes of around 19% in the period to 2038 – however there is no information presented about the current higher estimate to 2043 given the new assessment of housing need. It is essential that this figure is provided and we anticipate it will represent a very significant increase in visitor pressure.

When taken together, other pressures, beyond those relating to recreation have a significant impact on the resilience of designated heathlands and maintaining existing levels of use may no longer be sufficient to prevent further harmful impacts to sites. The Council should consider the need to actively reduce pressure in some locations, therefore, in the long-term the heathland mitigation strategy will need to either reduce visitor numbers on heathlands or deliver opportunities to expand and connect heathland sites (or a combination of both) in order to increase their resilience.

The need for a new stand-alone HIP must be considered in this context and to deliver either of these outcomes, sites must not be allocated for development within the 5km zone unless they can be linked to HIP provision that can be confidently secured and will be demonstrably effective. In addition, a strategic approach must be taken to identifying suitable allocations within the 5km heathland zone which minimise the in-combination effects of development including loss of functionally linked land, and provide opportunities to enhance and maintain corridors to reduce the isolation of heathland sites. This should seek to identify and secure greenspace sites which have the potential to both function effectively as SANGs and contribute to the buffering of impacts to heathland sites.

The recommendations made by Footprint Ecology are supported, and the creation of links between SANGs in particular is supported. Active travel routes linking SANGs by foot and cycleways will potentially help facilitate sustainable travel between developed areas and also provide more varied and attractive options for users, increasing the attractiveness of these sites. Connected SANGs, if well designed, also mean better connected green corridors. However, strategic approaches must be cautious of diverting recreational activities into other sensitive habitats. Increasing use of and improving access to additional green spaces must be balanced with the risk of negative impacts on the freshwater habitats of the River Stour for example. This would be achievable by ensuring that sufficiently large and varied sites are allocated and enhanced to provide attractive alternatives, avoiding allocating narrow river corridors as SANGs.

The proposal in para 13.2.3 is unclear in the use of 'managing' whether it is proposing facilitating better access to heathlands to reduce harm caused or mitigating recreational use by reducing accessibility. Either way DWT do not support this proposal in isolation for mitigating the impact of dispersed housing. Identification of and contributions towards delivery of additional infrastructure should be required for all development and if there is no scope for delivery of additional infrastructure, or enhancement of existing to mitigate impacts then the development may not be viable.

### 13.3. Shapwick, Kingston Lacy and the Stour Valley Park

**Question 40: To what extent do you agree or disagree with development at Shapwick**

**to enable the delivery of public benefits from investment in the Kingston Lacy Estate?**

- a. Agree**
- b. Partially agree**
- c. Neutral**
- d. Partially disagree**
- e. Disagree**

**Please provide any further comments or reasoning**

There are no specific sites proposed for development at Shapwick as part of this consultation. Any development proposals would be expected to meet the usual planning tests with respect to impacts to biodiversity and be considered in the same way as any planning application if taken forward. The delivery of public benefits on the Kingston Lacy Estate should not be considered factors which allow development to take place which would not otherwise be permitted unless they contribute to the mitigation of impacts such that the proposals become acceptable.

It is not clear whether the intention is to allocate development areas in Shapwick in the next phase of Local Plan production but the lack of an opportunity to comment on potential sites at this stage is disappointing.

Approaches to any development here must be in line with that for any development site. Sites should be subject to an ecological survey to identify any key ecological features, protected and priority species and priority habitats. This should be undertaken as identified in the introduction to appendix A ahead of the next phase of Local Plan production so that any important features are identified that may need protection within policy.

Proposals to develop any sites must apply the mitigation hierarchy, and this approach should apply to all features of the site which support biodiversity, not just priority habitats. This includes non-priority habitats of local value and any features of the site which support protected and priority species or contribute to landscape scale connectivity for wildlife.

Factors which must be considered are the location of the Bryanston Greater Horseshoe Bat Consultation area, suitable buffers to the habitats of the River Stour corridor and floodplain and local SNCIs. The River Stour Floodplain is part of the Higher Potential Ecological Network and provides opportunities to expand and connect the existing ecological network in the area.

## Section 14: Onshore Wind, Solar, and Battery Energy Storage

### 14.2. Identifying suitable areas

**Question 41:** We have outlined some areas which could be appropriate for wind turbines, ground mounted solar panels and battery energy storage. To what extent do you agree or disagree with identifying broad areas of opportunity for wind, solar and battery energy storage?

- a. Agree
- b. Partially agree
- c. Neutral
- d. Partially disagree
- e. Disagree

**Please provide any further comments or reasoning**

DWT support the identification of potentially appropriate areas for renewable energy development which reduces the potential for harmful development proposals coming forward on environmentally sensitive or ecologically valuable sites. However, it is essential that the areas exclude sites of local importance to biodiversity **and geodiversity** as well as statutory designated sites. From examining the mapping it appears this may be the case for SNCIs, though it has not been explicitly stated within the Wind, solar, and battery storage opportunity areas background paper. If so, this should be clarified to make it clear that these sites are not suitable for renewable energy development proposals. In addition to SNCIs, Habitat Restoration Sites, where activities to actively restore semi-natural habitats have taken place and other priority habitats should also be excluded from the areas that are mapped as potentially appropriate.

It is noted that the Bryanston Greater Horseshoe Consultation Zone Band B has been used as the limit for potential suitability of small scale wind turbines around Blandford. It would be beneficial to collect data to inform assessments of landscape use and likely areas of higher impact at a landscape scale and use existing data if available rather than rely on assessment at a site-by-site basis to identify important commuting routes and foraging areas for this species. Wind development has the potential to have a hugely harmful impact on this species, and other bat species. Population level assessment of significant colonies would not replace site-level assessment but would provide additional information as to the suitability of a proposal and the potential for impacts as site-level assessment is often undertaken using relatively few samples over a short period of time. It is known in Dorset that many species of bat travel long distances to swarming sites on the coast or in South Wiltshire and also to hibernation sites. Significant breeding colonies are likely to have regular routes to these sites and to foraging areas which would be better assessed by study of the behaviour of the colony rather than assessment of an individual site.

Likewise, the identification of key migration routes and corridors for bird should be considered at a landscape level and not rely on small scale assessments undertaken at a single point in time for a specific development as this is unlikely to successfully identify potential conflict unless undertaken over a very long time period.

## Section 15: North of Dorchester Masterplan

### 15.3. Matter 1: Eastern edge

**Question 42: Since Roman times, the centre of Dorchester has had a prominent position in the landscape. One of the threats to this identity is at the eastern edge of the potential development area (near the A35). Would you support keeping this eastern area more green and open, even if that means fewer homes, facilities and jobs?**

- a. Agree
- b. Partially agree
- c. Disagree
- d. Partially disagree
- e. Neutral

**Please provide any further comments or reasoning...**

It is noted that the North of Dorchester Masterplan covers a different area to that proposed as site LA/STLB/006 as shown in the sites map. The eastern edge of this potential site as shown on the sites map extends further north than the area covered by the Masterplan draft. Further clarification is required regarding the status of land which is outside the Masterplan area. It should either be considered a separate site proposal for allocation or clearly identified as being designated for the creation of greenspace only.

DWT broadly support using garden city principles to approach the design of new settlements, as a way of ensuring that development on this scale is well-planned, sustainable, inclusive and landscape-led design and expect the proposals for North of Dorchester to be an exemplar. However, the potential allocation of additional land which has not been included in this Masterplanning approach is not supported. Additional land outside the Masterplan area must not be allocated for housing unless included in the overall design.

The Masterplan design includes green corridors running through the North of Dorchester area and including an area of natural greenspace on the eastern edge. This approach to creating connected corridors for natural space and wildlife is strongly supported. There is potential for the additional land within the LA/STLB/006 site mapped to be allocated to the north for the provision of natural greenspace, extending and connecting the proposed greenspace as part of the Masterplan. This should be clearly stated in any policy for the site and separated from the North of Dorchester Masterplan area.

### 15.4. Matter 2: Employment locations

**Question 43. Supporting jobs, homes and services all in one place is an essential part of the health of a town. Do you see new workspaces that are integrated into walkable neighbourhoods and local centres as an attractive part of Dorchester in the future?**

- a. Agree**
- b. Partially agree**
- c. Disagree**
- d. Partially disagree**
- e. Neutral**

**Please provide any further comments or reasoning...**

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## 15.5. Matter 3: Pigeon House Farm neighbourhood

**Question 44: We believe that the valley at Pigeon House Farm can play an important role in encouraging access to nature and celebrating local landscape – What type of development, if any, do you think could help support this in a sustainable way?**

- i. A smaller scale of development
- ii. A larger scale of development
- iii. The use of the area as an undeveloped landscape buffer, for recreation, education and nature interpretation, without any housing development.
- iv. A mixture of the above

**Please provide any further comments or reasoning...**

It is noted that the Pigeonhouse Farm area of the North of Dorchester Masterplan does not form part of the proposed site LA/STLB/006. There is therefore no consideration of the suitability of this land for development as part of the local plan process. It is also not included within the proposed development bring brought forward by the North of Dorchester Consortium.

As this area is not being considered as a allocated site, the only appropriate approach is to retain it as an undeveloped landscape buffer.

There are significant opportunities to deliver real enhancements for nature and wildlife in this area. However, as highlighted in our response to the proposed site LA/STLB/006, this must not be at the cost of degradation of the existing natural interest of the area.

Dorset Council's draft Masterplan document for the North of Dorchester Garden Community identifies that: "...while many people live within easy reach of a walk into the countryside, some of the more accessible parts of the surroundings have become degraded and lack diversity." but does not acknowledge the potential link between public access and degradation of natural habitats.

DWT support improving access to nature for people, but it must not come at a cost to the environment. It is essential that first and foremost, existing habitats of high and potentially high value are protected and harmful impacts are avoided and mitigated. Degradation of existing habitats due to direct and indirect impacts resulting from development is not an option and access must be fully considered with this in mind.

## 15.6. Matter 4: Main east to west route

#### **Question 45: What are your priorities for a new east–west route?**

DWT have significant concerns about a proposed east-west route which will necessitate fragmentation of the water meadows to join the B3147 north of Dorchester. It is important that roads, pedestrian and cycle routes are planned so as not to fragment natural habitat and in particular the water meadows in a way that prevents it meeting its potential ecological value.

The link road is only addressed in very broad terms as part of the Masterplan document and infrastructure requirements only refer to a package of mitigation measures required to minimise the impact of such a road on existing road networks.

This potential linkage is also excluded from the Masterplan document which only covers the area east to Burton Road. DWT considers this to be a significant omission from the Masterplan draft. It is essential as part of the master planning process that the requirements of the east-west linkage are fully considered. There is significant potential for such a road link to impact biodiversity as well as other environmental concerns relating to this proposal and this must be fully considered at the master planning stage so that all considerations related to a new North of Dorchester development can be properly addressed. The water meadows north of the B3147 flood regularly and new road infrastructure has potential to impact hydrology, drainage and result in chemical pollution from vehicles which will all have potential to cause harm to the environment and impact future management and enhancement of the water meadows for biodiversity.

This linkage is not addressed as part of the North of Dorchester Consortium's Masterplan proposal either. Given that this is identified as key infrastructure that will be required to deliver the vision and the aspirations for the new community, the full requirements and impacts associated with this must be fully assessed and identified in order to show that a North of Dorchester development will be viable and that proposed management and enhancement of the water meadows as described within the North of Dorchester Consortium's proposals are deliverable.