

## Portland NP 1<sup>st</sup> Consultation Version Responses in Plan and Policy Order

Respondent:	Aspect	Comment:	Action:
DCP detailed	Foreword	It's not just about the neighbourhood plan adhering to national and local policy. The foreword should refer to the requirement to meet all the 'basic conditions' (i.e. also EU law, promoting sustainable development etc.).	Addressed elsewhere in the Plan
Portland Port	Section 2	I'd like the sentence in paragraph 2.1 that makes reference to the port to discuss the fact it is an important gateway and a deep-water port benefitting from a business park and industrial estate adjacent to its maritime berths, jetties and anchorages and can propose some words to replace the existing sentence if this is acceptable.	Amend 2.1
Portland Port	Section 2	Map on page 6 could show an arrow in a different colour for the potential Jurassic coast highway. It would also be helpful to discuss this requirement in the plan	Inappropriate on that map
DCP detailed	Section 2	2.6 'The landscape left from open cast quarrying is difficult to restore'. It should be recognised that national and local policies require the restoration of minerals sites.	Addressed elsewhere
DCP detailed	Section 2	2.7 This para should set out the full title of the Heritage & Character Study (or refer to it in a footnote) to make it clear what study is being referred to.	Include footnote
DCP detailed	Section 2	Page 6 4 <sup>th</sup> box Typo - 'ratio of house process prices to income'	Delete typo
DCP detailed	Section 2	2.9 This should refer to the principle of the two areas remaining open and undeveloped with little potential for development (reflecting the assessment of character) – rather than to the need to protect these areas from the negative effects of development (which is more a policy response to the evidence).	Amend
Minerals authority	Section 2	Page 5 It is stated that there are 324ha of quarries. This is doubtful - there may be 324ha of land with planning permission for quarrying, but a substantial area of this has not been developed or has been worked and restored.	Amend
DCP detailed	Section 3	3.1 Again list all basic condition requirements i.e.: <ul style="list-style-type: none"> <li>• Have regard to NPPF &amp; other national planning policy &amp; guidance;</li> <li>• Conform to strategic policies of WDWP Local Plan &amp; Dorset Minerals and Waste Plan;</li> <li>• Not breach or conflict &amp; be compatible with EU Obligations; and</li> <li>• Contribute to achievement of sustainable development</li> </ul>	The basic conditions are set out in 4.2
DCP detailed	Section 3	3.8 Simply delete 'alongside its borough-wide policies also' or delete and replace with 'alongside its policies covering the plan area also'. This is because plan area-wide policies also apply to West Dorset, not just WPBC.	Replace similar to suggested
DCP detailed	Section 3	3.9 Delete: 'In finding the new Local Plan 'sound' in 2015, the Inspector recommended that an early review should be undertaken primarily because the Local Plan was not robust enough in demonstrating a five-year supply of housing'. And replace with: 'In finding the new Local Plan 'sound' in 2015, the Inspector recommended that an early review should be undertaken primarily because the Local Plan did not make adequate provision for the whole of the plan period (2011 to 2031). The Inspector also noted that the councils' five-year supply of housing land was close to the minimum required to provide choice and competition'.	Amend
DCP detailed	Section 3	3.10 Delete 'These include a more logical assessment of green areas' and replace with 'These include the need to develop a more comprehensive and effective approach to managing green infrastructure'.	Amend
DCP detailed	Section 3	3.11 Typo – 'The first stage of the Review was and an Issues and Options...	Amend typo
DCP detailed	Section 3	3.12-3.15 The Infrastructure Delivery Plan (IDP) does not form part of the adopted local plan as so does not form part of the strategic policy context. These three paras could be deleted. If retained a typo need correcting:	Delete as suggested

		Para 3.12 ‘...of their Local Plan and to show how necessary infrastructure requirements...’	
DCP detailed	Section 3	3.28 The neighbourhood plan can only really reflect the land use and development aspects of the wider strategy for Portland. Para 3.28 lists all the ‘desires’, some of which are not land use related and beyond the remit of the neighbourhood plan. Some redrafting would be helpful to more clearly explain what aspects of the wider strategy the neighbourhood plan could address.	Re-word slightly
Minerals Authority	3.1 /4.2	<p>There appears to be no reference to the requirement for the Neighbourhood Plan to be in conformity with the strategic policies of the Minerals and Waste Plans which form part of the Development plan. The policies of the Neighbourhood Plan must be in general conformity with the Bournemouth, Dorset and Poole Minerals Strategy (2014) and should have regard to the emerging Minerals Sites Plan and Waste Plan.</p> <p>Currently the draft Neighbourhood Plan includes the following:</p> <p>Foreword: ‘We must adhere to national planning policy and conform to the strategic policies of the West Dorset, Weymouth and Portland Local Plan. Beyond that, we are free to set the land use policies that we feel are necessary.’</p> <p>‘3.1 In preparing our Neighbourhood Plan we are obliged, by law, to:</p> <ul style="list-style-type: none"> <li>• have regard to national policies and advice contained in guidance issued by the Secretary of State</li> <li>• ensure the Plan is in general conformity with the strategic policies contained in the Local Plan’</li> </ul> <p>‘4.2 ... We understood from the outset that it would have to meet the ‘basic conditions’:</p> <ul style="list-style-type: none"> <li>• have regard to national policies and advice contained in guidance issued by the Secretary of State</li> <li>• contributes to the achievement of sustainable development</li> <li>• is in general conformity with the strategic policies contained in the development plan for the area – the West Dorset, Weymouth and Portland Local Plan</li> <li>• does not breach, and is otherwise compatible with, EU obligations</li> </ul> <p>Each of these paragraphs should include reference to the need for the Neighbourhood Plan to be in general conformity with the Development Plan which includes the Bournemouth, Dorset and Poole Minerals Strategy 2014 and the need to have regard to the emerging Minerals Sites Plan and Waste Plan. As of 1<sup>st</sup> December 2017, these Plans will be published, and as such will carry some weight.</p>	Previous comment by MA that has been addressed – change noted by MA
DCC	Section 3	There is a legal requirement for the Neighbourhood Plan to exclude proposals for development on mineral sites which is not compatible with extant restoration or aftercare requirements (because this is ‘excluded development’). This supports our comments on Policies EN5 and ST1 if the proposals are deemed to be incompatible on further consideration. (attached)	Add sentence to that effect
DCP detailed	Section 4	There seems to be some repetition of earlier sections, notably in relation to the basic conditions / working group / plan status etc. Some editing to avoid repetition would be helpful.	Minimise repetition when re-drafting
DCP detailed	Section 4	4.3 Is there any summary document of the consultation undertaken to date? There is a document produced in 2013, which is online - <a href="https://www.portlandplan.org.uk/wp-content/uploads/2016/06/Consultation-Summary-Ver3-2013.pdf">https://www.portlandplan.org.uk/wp-content/uploads/2016/06/Consultation-Summary-Ver3-2013.pdf</a> but there does not appear to be anything since. A Consultation Statement will be required when the neighbourhood plan is submitted, as recognised in para 5.6.	Reference to Consultation Statement is in the Plan
DCP detailed	Section 4	4.9 ‘...the Plan will be deemed ‘made’ by the local planning authority, <del>West Dorset and</del> Weymouth and Portland Borough Council’.	Amend
DCP detailed	Section 5	5.3 This para explains that after each policy, the neighbourhood plan sets out in brief the relevant national planning policy context and the relevant policies from the local plan. At submission, these matters will need to be covered in more detail in the Basic Conditions Statement. Consideration should be given to whether these brief summaries need to be included in future versions of the neighbourhood plan.	Correct. A Basic Condition Report will be produced to accompany submission document.

			The strategy references from the Submission Version
Historic England	Section 5	Thank you for your consultation on the draft Portland Neighbourhood Plan. This provides an impressively comprehensive schedule of policies and proposals which respond to issues identified as affecting or being relevant to the Plan area. We are especially pleased to note the extent to which the community values its historic environment and the specific policies for its protection and enhancement. There are no site allocation policies and so as a consequence little in the Plan which would present a need for on-going interest or attention for us. It only remains for us to congratulate your community on its work to date and wish it well in taking the Plan through to being made.	No objections from HE at this stage Support noted
DCP detailed	Section 6	Under 'Shopping and Services' it says 'Define and protect two shopping centres' however, four are identified in Policy Port/SS3. The policy and the table of objectives need to be consistent	The objectives are as agreed, the policy has developed since
DCP detailed	Section 7 Overview	7.2 handed over to a land trust' – is this correct or are they simply managing agents?	Correct the reference to Land Trust
DCP detailed	Section 7 Overview	7.6 This para should recognise that the whole Island is identified as having 'archaeological potential' to which paragraph 2.3.8 of the local plan refers.	Add sentence as suggested
DCP detailed	Section 7 Overview	7.6 Typo - 'national schedule ancient monuments' should read 'national schedule of ancient monuments'.	Amend
DCP detailed	Section 7 Overview	7.7 This paragraph seems to suggest that there is a need to protect certain features, such as those in the sculpture park and those associated with the Olympic legacy, which would not generally be considered to be even non-designated heritage assets. If this is the intention, then a specific policy may be required, together with sufficient evidence to justify the protection of any specifically identified features	Note point- but this para is only an overview
DCP detailed	Section 7 Overview	7.8 'Character Assessment Report provides important up-to-date evidence'. This para should also refer to the recently updated (2017) Conservation Area Appraisals which include considerable detail and have been adopted by WPBC.	Add reference
DCP detailed	Section 7 Overview	7.8 Typo - '... evidence to support the planning policies <del>that</del> in the Neighbourhood Plan...	Amend sentence
DCP detailed	Section 7 Overview	7.10 Objectives It might be helpful to re-order the objectives to follow the order of the policies later in Chapter 7. There is some uncertainty about what is being sought in some of the objectives and how they will be taken forward, in particular: - What are the public realm improvements being sought for Sea Wall and West Weares? - What does 'Support re-use of redundant mines and quarries in benign and sustainable ways' mean? - How will opportunities for increased renewable and sustainable energy be identified?	Slight re-ordering Not changed as they have been agreed
DCP detailed	Section 7 Overview	Map 3 This map of statutorily designated ecological and geological designations should show the Jurassic Coast World Heritage Site. The supporting text in para 7.3 refers to the extensive local wildlife designations on the Island, but these are not shown on the map. Perhaps they should be.	Map changed
Minerals Authority	Section 7 Overview	Para 7.4 Restoring the quarries to a productive use is a challenge; one option is the creation of a wildlife reserve, which has been successful at Kingbarrow, for example. Alternatively, where restoration conditions are not in place, and subject to planning controls, it is felt that redundant quarries can provide opportunities for appropriate development.11	Previously made comment dealt with – change noted by MA

		Para 7.4 appears to assume that quarries are to be treated as 'brown-field land' appropriate for development. This is not, in our view, appropriate and the policy of the Mineral Planning Authority is that Portland Quarries should be restored in accordance with Policy PD5 of the Minerals Strategy.	
DCP	EN01	<p>It is not appropriate for Policy Port/EN1: Prevention of Flooding and Erosion to 'usually support' proposals to prevent coastal erosion or flooding, especially since the vast majority of the coast of Portland is covered by nationally and internationally important nature conservation designations. This 'blanket' support also conflicts with:</p> <ul style="list-style-type: none"> <li>• the national policy approach of applying Integrated Coastal Zone Management; and</li> <li>• the strategic policies in the Shoreline Management Plan where, in places, the approach is one of 'no active intervention' as outlined in paragraph 7.16 of the neighbourhood plan.</li> </ul> <p>The wording of the first part of this policy needs to be amended to clarify that it would not apply to development (for example housing or employment), which is accompanied by flood alleviation and / or coastal protection measures. That would be contrary to national and local plan policies on flood risk (which apply the sequential and exception tests) and national and local plan policies on the coast, where Integrated Coastal Zone Management should be applied. The second part of this policy is too imprecise as it does not set out:</p> <ul style="list-style-type: none"> <li>• the circumstances whereby an area of land may be considered to be needed for flood defence works; or</li> <li>• what such land would be safeguarded against.</li> </ul> <p>These matters are more clearly addressed by local plan Policy ENV6: Local Flood Alleviation Schemes in the local plan, which:</p> <ul style="list-style-type: none"> <li>• seeks to protect land only after a local flood alleviation scheme has been drawn up; and</li> <li>• only seeks to safeguard land against development which would prejudice the implementation of a proposed flood alleviation scheme.</li> </ul> <p>There does not seem to be any need for the second part of Policy Port/EN1, given the existence of Policy ENV6 in the local plan and the greater clarity it provides. A possible way forward might be to delete this part of the policy and to cross refer to local plan Policy ENV6 in the supporting text.</p> <p>Footnote 15 on Page 22 sets out that Portland Town Council has requested that the approach of 'no active intervention' for the Hamm Roundabout to Fleet section of coast should be changed to 'hold the line' through the local plan review. Any such change would need to be considered through a future review of the Shoreline Management Plan, rather than through the local plan review.</p>	<p>Re-word policy</p> <p>Amend wording of the footnote</p>
Environment Agency	EN1	<p>We support the Neighbourhood Plan includes a section on Flood Risk, we note that the plan (Map.4) uses the all the different current published flood maps for identifying the sources of flooding. This is an approach we would support to ensure that development considers all sources of flood risk.</p> <p>We would also highlight that Weymouth Borough Council also have Strategic Flood Risk Management documents that supported their local plan that considered climate change impacts in this area that should be included as part of your plan (further comments on this below).</p> <p>We have the following additional comments on Policy Port/EN1</p> <p>"Development proposals which seek to prevent coastal erosion or flooding and protect local property and businesses will usually be supported."</p> <p>If new development is proposed in a flood risk area then under National and Local Planning Policy Flood Risk the Sequential Test must be considered prior to supporting the development.</p> <p>It may be that if the development passes the Sequential Test then as part of the Exception Test (if required) that the delivery of flood defences to assist in the protection of the development and wider community can be supported.</p> <p>We feel that this should be made clear within the document otherwise it could be misinterpreted to be inconsistent with National and Local Policy.</p>	<p>Include additional text from EA in brief in the Plan</p>

		<p>We support that the plan identifies that there is likely to be the requirement for improved flood and coastal risk management infrastructure and that your policy has appropriately identified the Chiswell and Osprey Quay area. We also support that the actions and position within the Shoreline Management Plans have been identified. We would support that these are the appropriate actions in regards to this location.</p> <p>Due to the mechanisms of flooding in this location from the open coast, from overtopping the beach, and high tidal levels from the Inner Harbour it may be useful identifying where current flood risk management infrastructure is within the plan. You could then ensure that land in proximity to it, around the inner harbour, and coast can be safeguarded to meet the aspirations of this policy.</p> <p>Within Section 7.18 we recommend that you amended the text in relation to Strategic Flood Risk Assessments (SFRA), as they are undertaken by the relevant Local Planning Authorities to support their local plans. Therefore, in this case we believe it would be Weymouth and Portland Council, as well as Dorset County Council. As Weymouth and Portland Council produced Level 1 and 2 SFRA for their local plan, and Dorset County produce a SFRA to support their Minerals and Waste Local Plan.</p> <p>Please note that these SFRA documents are separate to the Strategic Flood Risk Management Strategy document Dorset County Council has produced as a risk management authority. This strategy document considers the local sources of flood risk. Further information on this can be found at: <a href="https://www.dorsetforyou.gov.uk/localfloodrisk">https://www.dorsetforyou.gov.uk/localfloodrisk</a>.</p> <p>Safe Access</p> <p>We would highlight that National Planning Policy Framework Planning Practice Guidance states that Access considerations should include the voluntary and free movement of people during a 'design flood', as well as the potential for evacuation before a more extreme flood. Access and egress must be designed to be operational for changing circumstances over the lifetime of the development. The Council's Emergency Planners would be consulted in relation to flood emergency response and evacuation arrangements therefore you may wish to engage with them in regards to this matter.</p> <p>Environmental Permitting</p> <p>We would also highlight that works within proximity to Environment Agency maintained flood defences are likely to fall under our Environmental Permitting Regulations.</p>	
Community	EN1	<ul style="list-style-type: none"> <li>• I agree Hamm Beach to the Fleet needs to 'hold the line' - no active intervention is insufficient to protect Portland one access road.</li> <li>• protection of Chesil and Portland Beach Road and is of high importance. Much of the Osprey Quay development is in flood plain with some parts below sea level. This area may also need additional protection.</li> <li>• Beach Rd is the primary arterial route- must be protected in any environmentally sound manner.</li> <li>• Chiswell and Beach Rd</li> <li>• The area from the boat yard up to the first roundabout towards Portland. Sea water and rain still settles in this area</li> <li>• Clean all road drains regularly</li> <li>• Coastal vulnerability</li> <li>• Flood risk, I hope the environment agency can be trusted for their opinion? I have been surprised by the continued intention to build close to the beach road. (school, homes and industrial), surely this contradicts advice against building on any potential flood risk area.</li> </ul>	Seems to be general support for policy
DCP	EN2	<p>It is not clear which 'natural resources and assets' Policy Port/EN2 is seeking to protect. It is not clear whether the main thrust of this policy is to encourage renewable energy developments and recycling (i.e. make better use of these 'natural resources') or to protect certain 'natural resources' (i.e. particular natural features) of the environment. Much of the supporting text in paragraphs 7.20 to 7.22 discusses renewable energies and energy efficiency measures. However, the notes at the bottom of page 23 suggest that Policy Port/EN2 is aligned with national and local plan</p>	Clarify that policy is about 'responsible use' not 'protection'

		<p>policies to protect the landscape, geological sites, seascape and soils. If these matters are to be dealt with in the neighbourhood plan, it would be better if they were the subject of two separate policies, which should use clearer terminology more consistent with the local plan.</p> <p>Features such as soils are typically considered to be ‘natural resources’ and are already protected by local plan Policy ENV 8. However, features such as the landscape, geological sites and seascape are not typically considered to be ‘natural resources’, but rather features of the natural environment. These features are already protected by Policies ENV 1 to 3 of the local plan. Given the policies in the local plan to protect the natural environment and natural resources, there may not be a need for a policy to deal with these issues in the neighbourhood plan. Also it is not clear what the ‘responsible use of natural resources’ means in criterion (i) of this policy.</p> <p>Criterion ii) of Policy Port/EN2 relates to the re-use and recycling of resources. This part of the policy should be deleted if ‘resources’ in this context means ‘waste resources’, as minerals and waste matters are dealt with by Dorset County Council.</p> <p>Criterion iii) of the policy refers to the production and consumption of renewable energy, which is also dealt with by the subsequent policy (Port/EN3). It would make more sense to rationalise these elements into a single policy dealing with renewable energy developments. Policy Port/EN2 is too permissive as it gives general support for the production and consumption of renewable energy. It (or Policy Port/EN3), should be more specific about where particular technologies would be permitted, but the suitability of any specific locations would need to be assessed and fully justified by evidence.</p>	<p>Explain further what responsible use means</p>
DCP detailed	EN2	7.22 This para should identify and reference the assessment that was carried out by Natural England in 2012.	<p>Ensure references are in footnote</p>
Community	EN2	<ul style="list-style-type: none"> <li>• SSSI (?) – more perhaps</li> </ul>	
DCP	EN3	<p>Policy Port/EN3 includes a reference to tidal power. In general, local authority jurisdiction coincides with the authority’s seaward administrative boundary, which is usually low water mark, although it may have jurisdiction over certain estuarine and harbour areas. It should be made clear in the supporting text that this policy would only apply to areas within the administrative jurisdiction of Portland Town Council and could not be used to determine proposals for tidal power below low water mark beyond its jurisdiction (for example off Portland Bill).</p> <p>Policy Port/EN3 sets out a number of criteria against which proposals for all forms of renewable energy, including wind and tidal power, will be judged. The policy then goes on to identify specific ‘Wind Energy Search Areas’ which would be the only areas where proposals for wind farms and wind turbines would be supported. Paragraph: 005 Reference ID: 5-005-20150618 of the PPG states that “in the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan.” If this policy is to identify areas suitable for wind energy development, then it should reflect the PPG and make it clear that such developments would not be permitted elsewhere within the neighbourhood plan area. Paragraph: 032 Reference ID: 5-032-150618 of the PPG states that “suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient. The ‘Wind Energy Search Areas’ on Map 5 of the neighbourhood plan are not ‘clear allocations’ and are contrary to national guidance.</p> <p>The PPG sets out how suitable areas for renewable energy developments should be identified. Paragraph: 005 Reference ID: 5-005-20150618 states “there are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to. It is not clear from the</p>	<p>Amend policy approach to be more strategic</p>

		<p>neighbourhood plan or the supporting documentation how the 'Wind Energy Search Areas' have been selected and whether the guidance in the PPG has been followed.</p> <p>There does not appear to be any evidence to show how the requirements of the technology have been taken into account in identifying the 'Wind Energy Search Areas'. There also does not appear to be any evidence, such as a landscape or heritage sensitivity study, to take account of the impacts (including cumulative impacts) on the local environment from developing wind energy in the identified search areas. If any such evidence has been produced, it should be made available, perhaps on the document library page for the neighbourhood plan - <a href="https://www.portlandplan.org.uk/document-library/">https://www.portlandplan.org.uk/document-library/</a>.</p> <p>All the 'Wind Energy Search Areas' are located in close proximity to areas which are protected by national and international designations, including the Jurassic Coast World Heritage Site, SSSIs and Conservation Areas. The search area at The Verne also adjoins a Scheduled Ancient Monument and the search area south of Tradecroft is located in close proximity to St Georges Church, a Grade I Listed Building. Having regard to the PPG, the proximity of the search areas to these designations suggests that they are unlikely to be 'suitable areas' for wind energy developments. Since no SEA has been produced to support the 1st draft of the neighbourhood plan, it is not clear how the search areas have been selected or how any other reasonable alternative locations have been assessed in terms of their environmental impacts.</p> <p>There is also potential conflict with other policies in the local plan. One of the search areas is located within a key employment site. Two of the areas lie within (or partly within) an area of archaeological importance and one of these is also partly within one of the aspirational areas for the expansion of Portland Quarries Nature Park. Another area lies wholly within an important local gap. The potential impacts of wind energy developments on these local plan designations do not appear to have been taken into consideration.</p> <p>The views of the local community on the suitability of these sites are being sought through consultation on the neighbourhood plan. The PPG makes it clear that "the views of local communities likely to be affected should be listened to." However, it should also be borne in mind that Written Ministerial Statement HCWS42 gives local people the final say on wind farm applications. It states that "when determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:</p> <ul style="list-style-type: none"> <li>• the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and</li> <li>• following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing."</li> </ul> <p>HCWS42 highlights the need to secure local community support for any specific wind energy proposal, if ultimately planning permission is to be granted.</p> <p>Policy Port/EN3 sets out a number of criteria against which proposals for renewable energy should be considered. Paragraph: 007 Reference ID: 5-007-20140306 of the PPG states that "policies based on clear criteria can be useful when they are expressed positively (i.e. that proposals will be accepted where the impact is or can be made acceptable)." Whilst the policy generally supports such proposals, the phrase 'no unacceptable effects' may need to be redrafted to reflect the guidance.</p> <p>Paragraph: 007 Reference ID: 5-007-20140306 of the PPG sets out how any such criteria should be shaped. The PPG also sets out in more detail the particular planning considerations that relate to specific renewable technologies – see here - <a href="https://www.gov.uk/guidance/renewable-and-low-carbon-energy#particular-planning-considerations-for-hydropower-active-solar-technology-solar-farms-and-wind-turbines">https://www.gov.uk/guidance/renewable-and-low-carbon-energy#particular-planning-considerations-for-hydropower-active-solar-technology-solar-farms-and-wind-turbines</a>.</p> <p>The criteria in Policy Port/EN3 do not appear to be consistent with the PPG. Some key issues are highlighted below. The policy requires the acceptability of proposals to be assessed against the impacts on 'local landscape, countryside and shore' and 'sites of local nature conservation and archaeological importance'. This could be interpreted as meaning</p>	
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		that it would not be necessary, under the neighbourhood plan, to assess the acceptability of proposals for renewable energy against the impacts on nationally and internationally important landscapes, wildlife sites and archaeological sites. It could also be interpreted as meaning that it would not be necessary to assess the acceptability of proposals against the possible impacts on heritage assets. These are all major concerns given the location of the areas identified on Map 5 as 'Wind Energy Search Areas'.	
Portland Port	EN3	Renewable energy development - I'm concerned that the areas identified on Map 5 relating to wind farms are overly restrictive and suggest this is extended to include the whole island	Not possible and contrary to advice from DCP
Minerals Authority	EN3	The 'Wind Energy Search Areas' identified on Map 5 include parts of two quarries (Independent and Coombefield) and Independent Masonry Works and the access to Admiralty Quarry. The development of Coombefield Quarry for wind energy may sterilise mineral resources and such development at Independent Quarry or Masonry Works should only be permitted where it would not prejudice the use the masonry works and/or the restoration of the quarry. Accordingly, Policy EN3 is not in conformity with policies SG1 and SG3 of the Minerals Strategy and would be likely to prejudice the achievement of the aims of Policy PD5 of the Minerals Strategy with respect to the restoration of mineral sites. The draft policy and the 'Wind Energy Search Areas' identified on Map 5 at Independent and Coombefield Quarries should therefore be amended in light of the above. <b>Change Noted – DCC would reserve the right to object to proposals which upon further consideration would prejudice the Minerals Strategy with respect to the restoration of mineral sites.</b>	Dealt with – change noted by MA
Albion Stone	EN3	We note the comments about Solar Farms, but the farm for Independent has been postpone and will probably be cancelled due to the scandalous charges for connection to the grid. Wind farms of any note will suffer problems as well as the addition concerns about the local bat population, so I fear they are also a non-starter.	Note and take into account the issues identified by the respondent
Minerals Authority	EN3/EN4	There would also appear to be conflict between policy EN3 and policy EN4 with respect their respective aims to both include Admiralty and Independent Quarries in the Portland Quarries Nature Park but also to development those sites for renewable energy production.	Address any possible conflict
Dorset AONB	EN3	I am writing in response to your consultation regarding the Portland Local Plan. As the Plan area is relatively remote from Dorset AONB, with Fortuneswell being in the region of 7 km from the designation boundary, the potential for the Plan to have significant implication for the character and appearance of the AONB is limited. However, I would highlight that the aspirations of the Plan for the allocation of Wind Energy Search Areas may have significant implications. Portland is a prominent and significant landmark within the seascapes of the AONB. Although it is not considered that the presence of the AONB designation results in a high level of restriction upon development on Portland in general, there are some instances where it is foreseeable that the introduction of large scale, prominent development could affect the exceptional undeveloped character of the AONB's coastline. It is my opinion that encouraging large scale wind turbines in the locations identified would foreseeably result in widespread impacts on the character and appearance of the coastline. • I would encourage the Neighbourhood Plan Group to consider the significance of the AONB's undeveloped coastline in relevant decisions, such as the refusal of the proposed Navitus Bay project. Although I recognise the significant difference in scale between that proposal any your aspirations, it should also be remembered that the Navitus Bay proposal was, at closest, approximately twice as distant from the AONB designation. Furthermore, Navitus Bay was located within the open sea, which contains relatively few scale comparators, whereas the scale of turbines on Portland would be much more readily perceived due to the surrounding context. I would also encourage the Group to carefully consider the matter of the presentation and visitor experience of the World Heritage Site, which is much closer to the Search Areas than the AONB designation.	Note views of AONB

Community	EN3	<ul style="list-style-type: none"> <li>• In my opinion, the likely constraints on locating wind turbines in the areas identified could substantially inhibit delivery and output. I would therefore recommend that the Group considers focussing on alternative forms of renewable energy.</li> <li>• Whilst Portland has historically used wind power (as evidenced by the historic windmills), some of the proposed sites for wind turbines are very near centres of population e.g. Grove Road and as such there could be a conflict here.</li> <li>• Not familiar with the areas indicated, but I am in support of potential renewable energy projects on the condition that they are not intrusive to the locals and their way of life, and potentially positioned sympathetically within their surroundings. The thought of the Island becoming an energy island feels like it will suit the community and its uniqueness.</li> <li>• I do not support wind turbines that are visible on the skyline. Instead research and development initiatives should focus on submarine tidal turbines as a renewable energy source.</li> <li>• I am encouraged about the idea of an island energy project to make use of the solar and wind we benefit from for a longer period of time of the year, but this should also be encouraged on the basis a solar project is rolled out to properties on the island</li> <li>• Renewable energy. Portland historically had windmills -perhaps a modern version is a good idea, however tidal energy (always constant) is somewhere better suited Portland Harbour is effectively a tidal lagoon and we have strong currents between the Shambles and the Island clever positioning of turbines would be amazing and generate lots of KWH</li> <li>• Areas must be identified bearing in mind safety issues of sailing etc in this area</li> <li>• Consideration should be given to permitting solar panels on listed buildings</li> <li>• Support for alternative turbine type, a number not phased by larger turbines,</li> </ul>	Not much evidence of community support for wind power
DCP	EN4	<p>Policy Port/EN4 does not seem to add much to the existing policy in the local plan and may not be needed, subject to clarification on the purpose of the policy. If retained, it should be clarified whether the policy applies just to the allocated nature park land or whether it also applies to the 'aspirational areas'.</p> <p>It is not clear what "proposals that further the creation of a Quarries Nature Park" means. Local plan Policy PORT3 clearly sets out that its purpose is "to promote sustainable tourism, management of conservation and heritage interest, enhancement of public access and open spaces and opportunities for volunteer and community involvement."</p> <p>It would be helpful to clarify whether Policy Port/EN4 has the same or different aims, especially given the more permissive nature of Policy Port/EN5 which may also apply in parts of the nature park.</p> <p>There is a concern that criterion ii), which seeks "safe and convenient access for potential users" could potentially result in extensive areas of parking being proposed that would harm the intrinsic qualities of the nature park.</p> <p>Criterion v) of Policy Port/EN4 does not recognise the hierarchy of nature conservation sites in national and local policy. It does not give wildlife sites "protection commensurate with their status" as sought by paragraph 113 of the NPPF and is not consistent with local plan Policy ENV2, which recognises this hierarchy.</p> <p>Although the policy seeks to avoid damage to ecologically important sites within the nature park, where avoidance is not possible development may be permitted if "appropriate mitigation and compensation is put in place." This 'one-size fits all' approach is not appropriate since parts of the allocated and aspirational areas of the nature park have different levels of wildlife interest and are subject to different designations and levels of protection. Some areas are of local interest, some are designated as SSSIs and some are also protected by internationally important wildlife designations. The 'blanket approach' of criterion v) does not recognise the national and local plan policy approach of giving wildlife sites protection commensurate with their status. The policy needs to be amended to make it consistent with national and local plan policy.</p>	Review policy text

DCP detailed	EN4	7.31 It is a concern the Heritage and Character study says ‘ <i>Development in disused quarries should be encouraged to celebrate.....</i> ’ since disused quarries are greenfield sites and should be treated as other areas within the countryside (i.e. subject to restraint policies). The emphasis should be on the nature conservation designations within the quarries and the need to restore them for wildlife / recreation etc., rather than on ‘ <i>development</i> ’.	Does not necessitate a change
DCP detailed	EN4	7.32 ‘ <i>development necessary to realise the visitor potential of the park</i> ’ - although the text says this includes small scale activity-related tourist development, it would be helpful to be more specific about the scale envisaged.	Be more specific about scale
DCC Ecology	EN4	DCC NET support the policy for the continuation of the Portland Quarry Nature Park, as a way of helping ensure the high-quality restoration and management of these areas for the unique wildlife of Portland. The profile of green infrastructure and natural capital could be raised. Portland has an abundance of these and recognition of their potential value to Portland in the plan would be in accordance with the aims of the Dorset Local Nature Partnership. Development which may affect protected species or habitats should be assessed through the Dorset Biodiversity Appraisal Protocol, administered by DCC NET. Reference to this in the Portland Neighbourhood Plan would assist potential developers.	Add reference to Dorset Biodiversity Appraisal Protocol as suggested
Community	EN4	<ul style="list-style-type: none"> <li>• I completely support the extension of QNP as per map 6. I think it would be a great asset to the Island, preserving the open nature of the Island, wildlife habitats and adding to its attraction for our main visitor market who look for wildlife, walking etc.</li> <li>• Fully support expansion of the quarry parks, providing the plan makes provision for other locations suitable for small businesses, as outlined in the Business and Employment sections.</li> <li>• I am familiar with some of the quarries, one being the future development of Bowers Quarry by MEMO, which I feel is a once in a lifetime opportunity that should be taken. What an amazing asset it would be to Portland..... as long as traffic issues are dealt with alongside the project and locals considered for employment at the project... with local produce and knowledge utilised fully where possible and sustainable.</li> <li>• QNP – A Good idea</li> <li>• Overnight camping not regulated</li> <li>• Quarry nature park, Yes...more trees and any potential for pond life and woodland would be a real picnic oasis on the rocky island...how could it happen? A 20 year plan for nature loving volunteers...</li> </ul>	Evidence of community support
DCP	EN5	<p>The re-use of redundant mines and quarries may, in certain cases, be a County matter, especially if such uses form an integral part of the restoration of sites following extraction. Dorset County Council’s advice should be sought on the scope and content of Policy Port/EN5 to ensure that it does not impinge upon their areas of responsibility.</p> <p>The emphasis of the policy should be on nature conservation and retaining the unique open character of the quarries. Any development should be ancillary and small scale. However, the policy as written gives blanket support for a wide range of uses, which conflicts with: national policy on minerals restoration; the strategic environmental objectives of the local plan; local plan Policy SUS2 (which seeks to ‘strictly control’ development outside DDBs); and neighbourhood plan Policy Port/EN4 relating to Portland Quarries Nature Park.</p> <p>Paragraph 143 of the NPPF suggests a number of restoration uses for minerals sites that should be sought in local plans ‘including for agriculture (safeguarding the long-term potential of best and most versatile agricultural land and conserving soil resources), geodiversity, biodiversity, native woodland, the historic environment and recreation.’</p> <p>Restoration for “schemes that would benefit the local economy” as proposed in Policy Port/EN5 or for “economic-related development” as proposed in paras 7.4 and 7.5, are not generally sought by national policy.</p> <p>Many sites in redundant quarries will be located outside DDBs, either as currently identified or as proposed in the neighbourhood plan. The policy approach outside DDBs is to ‘strictly control’ development in accordance with local</p>	Amend Policy EN5 in view of the comments and issues highlighted

		<p>plan Policy SUS2. Policy Port/EN5 is not consistent with this approach, especially in relation to “economic-related development.”</p> <p>As written, the wording of Policy Port/EN5 is likely to give rise to pressure for a wide range of uses that may be interpreted as “economic-related development” or “schemes which would benefit the local economy”, such as manufacturing, offices, warehousing, or even housing. The term “tourism-related development” could be interpreted as meaning tourist facilities and / or built tourist accommodation, including hotels. It appears that the policy only supports “active recreation opportunities for local people”, suggesting that active recreation opportunities for visitors / tourists would not be appropriate. It could also potentially allow inappropriate recreational developments such as trampoline parks, bowling alleys, gyms etc.</p> <p>If the intention is to use some of the redundant quarries on Portland (outside the nature park) to boost the local economy or for recreational use, then it would be better to: undertake a search for potential sites; assess their suitability; and specifically allocate the most suitable sites for specific uses, such as employment or recreational uses. It is not clear where Policy Port/EN5 would apply as the neighbourhood plan does not include a map to show the location of such quarries. Page 18, para 7.4 suggests that it would apply in any quarry on Portland that is no longer active and is not subject to restoration conditions. This could potentially include parts of the allocated / aspirational Portland Quarries Nature Park. The application of both Policies Port/EN4 and Port/EN5 to this area (or parts of it) would be problematic as the latter is more permissive than the former. This inconsistency would not provide a clear policy framework for the determination of planning applications in the nature park.</p>	
DCP detailed	EN5	It is a concern that the Heritage and Character study says the transformation of the quarries into ‘public attractions’ is acceptable without being more site-specific, particularly given the many nature conservation designations.	Note point
Minerals Authority	EN5	<p>Policy EN5 appears effectively to seek to treat mineral sites as ‘brown-field land’ for re-development. This is in conflict with the NPPF. Quarries and Mines should be restored in accordance with Policy PD5 of the Minerals Strategy and draft policy EN5 is not in conformity with the aims of policy PD5.</p> <p>In any event the term ‘redundant mines and quarries’ should be defined. Does it include quarries which are not active but still contain economic reserves of stone, or restored quarries used for e.g. nature conservation, or just exhausted quarries which do not have any beneficial after-use and are not subject to requirements (e.g. s106 agreements) for restoration to a state for beneficial after-use?</p> <p>One possible option would be for the policy to be amended to apply only to quarries for which there are no enforceable restoration requirements. In this case, the policy should also then be amended to clarify the extent, if any, to which ‘re-use’ includes any built (or operational) development or may impact on important open gaps and the character and ‘openness’ of green space on Portland generally.</p>	Decided it would be safer to delete rather than amend the policy.
DCP	EN6	<p>It is not clear why Policy Port/EN6 is required in the neighbourhood plan since Policy ENV4 of the local plan sets out a framework for assessing the acceptability of proposals that may affect both designated and non-designated heritage assets, which is consistent with national planning policy in the NPPF.</p> <p>Policy Port/EN6 is entitled ‘Local Heritage Assets’, but it is not clear whether this applies: to all heritage assets (designated and non-designated), which are ‘local’ to Portland; or only to ‘locally important’ (i.e. non-designated) heritage assets on Portland. If, after review, the policy is still considered to be needed, it should be amended to reflect national policy and local plan policy relating to designated and non-designated heritage assets. It may also be helpful to use these terms in Policy Port/EN6 (rather than the term ‘local heritage assets’) to avoid any confusion.</p> <p>The policy refers to buildings or structures on the ‘Local Heritage List’ and the supporting text refers to a ‘Local Register of Heritage Assets’. The Council is not establishing a Local Heritage List or a Local Register of Heritage Assets. It may be more helpful to refer to the ‘Appraisal of the Conservation Areas of Portland as Amended 2017’. The policy could be revised to state that the amended appraisals, which include spatial and character analyses and identify</p>	If Council is not establishing a Local Heritage List or a Local Register of Heritage Assets, then policy has little relevance as it is written. Consider different policy approach. Take advice from Historic England

		important building groups, should be used to assess any impacts on the conservation areas (which are designated heritage assets). The policy could also be revised to state that the amended appraisals should be used to assess impacts on non-designated heritage assets on Portland, including the large number of 'important local buildings' identified in the amended Conservation Area Appraisals.	
Portland Port	EN6	Local heritage Assets – I am concerned that this is more restrictive than national policies that protect listed buildings and scheduled monuments and think that this policy needs to be revised with this in mind	It is aimed at protecting the non-designated assets
DCP	EN7	<p>The supporting text to Policy Port/EN7 discusses three historic jetties, namely Folly Pier, Durdle Pier and King's Pier, but these are not specifically named in the policy itself. Since all three structures are named as piers, it is not clear why the policy is entitled 'Historic Jetties'. If the intention is for the policy to relate to only these three jetties (and not others - including those in Portland Harbour); they should be specifically named in the policy itself.</p> <p>The policy itself does not convey what seems to be the primary aspiration (as set out in paragraphs 7.45 and 7.46), of bringing the jetties back into use for the economic and social benefit of the Island. If there is a realistic prospect of this aspiration being supported by Portland Port and of it being feasible and viable, then it should be more clearly expressed in the policy, if that is the intention. The policy should be deleted if this proposal does not have the support of the Port.</p> <p>Paragraph 7.41 refers to the possibility of using the jetties as access points for ferries from elsewhere in Dorset, but it is not clear whether this use, or any other use, would be viable. Feasibility and viability work should be undertaken before the neighbourhood plan is submitted. If this shows that the reuse of the jetties would not be feasible and / or viable, then the policy should be deleted.</p> <p>All three jetties appear to fall within nationally and internationally designated wildlife sites and two of the three (Durdle Pier and Folly Pier) appear to fall within the Jurassic Coast World Heritage Site. The potential environmental impacts of bringing these jetties back into use (and any associated works) needs to be investigated and should inform any assessment of feasibility or viability.</p>	Add extra clarification in the supporting text
Portland Port	EN7	Historic Jetties – In the second sentence of the policy wording my suggestion is that 'structures' appears before the word 'buildings'. I also question whether the use of the word building in necessary. The order of appearance in the text to be consistent with geography would be Kings Pier, Folly Pier, Durdle Pier or vice versa. Also, King's Pier and Folly Pier are within Portland Port's landownership.	Amend the supporting text
Community	EN7	<ul style="list-style-type: none"> <li>Given the road pressures, not just on Portland, but around the county, any use of Portland Port, that could provide travel services to and from the island, on a regular basis, would be very welcome. Linking to Weymouth, Swanage, Poole etc would give travel a bit of adventure and might encourage people to visit Portland when they might not drive.</li> <li>Existing piers of historical interest should be preserved. I have not visited the sites. Fishing spots? Picnic areas?</li> <li>A ferry service from Portland to Weymouth should be considered to cut down on traffic to the island by road</li> <li>East Weares – not sure how these would be of interest as most seem fairly dilapidated</li> <li>Don't know about the historic jetties...maybe raise awareness and open to the public...</li> </ul>	Evidence of some community support
DCP	EN8	<p>Defined Development Boundaries (DDBs) have been identified around the towns and larger villages in the local plan area. DDBs are a 'planning tool' to manage and deliver a sustainable pattern of development by applying different policy approaches either side of the DDB. Policy SUS2 states that within DDBs, "residential, employment and other development will normally be permitted". However, outside DDBs, "development will be strictly controlled, having particular regard to the need for the protection of the countryside and environmental constraints".</p> <p>The existing DDBs are discussed in paragraphs 7.47 and 7.48 of the neighbourhood plan. However, paragraph 7.49 refers to the "new built-up area boundaries." It is not clear whether this is a new designation, or whether these are</p>	There is no fundamental reason given for not revising the DDB. There are objections to some of the additions and omissions that need to be reviewed.

	<p>essentially revised DDBs. If the intention is for these to be revised DDBs, it would be clearer if the term ‘Defined Development Boundary (DDB)’ rather than the term ‘Built-up Area’, was used throughout Policy Port/EN8 and supporting text.</p> <p>Policy Port/EN8 largely re-states the approach of local plan Policy SUS2 in relation to development within DDBs. The policy itself makes no reference to how proposals for development outside DDBs should be assessed, but the supporting text (at paragraph 7.50) expresses an aspiration to “resist development proposals outside of the boundaries unless there are exceptional circumstances to justify it”. This does not reflect the approach in Policy SUS2 of the local plan, which normally permits a range of ‘countryside uses’ without the need to demonstrate exceptional circumstances. The stated aspiration to resist development outside DDBs unless there are ‘exceptional circumstances’ also seems to be inconsistent with a number of the policies in the neighbourhood plan, which seem to be more permissive than Policy SUS2 in relation to development outside DDBs.</p> <p>Whilst it is entirely appropriate for a neighbourhood plan group to review the local plan’s DDBs, it would not be appropriate to introduce a similar, but slightly different designation (i.e. built-up areas) with associated neighbourhood plan policy provisions that are inconsistent with local plan Policy SUS2. The best way forward would be to revise the current DDBs on Portland, perhaps with some commentary in the neighbourhood plan, but to delete Policy Port/EN8 and rely on Policy SUS2 to assess development proposals either side of the DDB.</p> <p>The approach to assessing the built-up area boundaries is set out in a background paper here - <a href="https://www.portlandplan.org.uk/wp-content/uploads/2017/11/PNP-BUAB-Assessment-V3-Web.pdf">https://www.portlandplan.org.uk/wp-content/uploads/2017/11/PNP-BUAB-Assessment-V3-Web.pdf</a>. It appears that the boundary in relation to land rear of Ventnor – 8 units, has been drawn on the basis of the current owner’s intentions. This is inappropriate, not least because the ownership of the site may change in future. DDBs should be redrawn only on the basis of relevant planning considerations.</p> <p>The proposed amendments to the DDB at the top of Reforne are a matter of concern. It is proposed to include St Georges Church (a Grade I Listed Building) and recreational areas within the DDB. These areas are very open in character and provide the setting, not only for the church, but also for the approach to Easton along Reforne. These areas should not be included within the DDB, because it would not be appropriate to normally permit residential, employment and other development in this area. The approach of strictly controlling development in this location (i.e. outside DDBs) is considered much more appropriate.</p> <p>The proposed amendments to the DDBs within Portland Port are also a matter of concern. The background paper recommends the removal of all DDBs “within the area classified as LCA2 ahead of reviewing a Masterplan for the whole of the Northern Arc Area”. It is assumed that LCA2 in this context means Landscape Character Area 2: The Grove and The Verne from the recently completed Heritage and Character Assessment.</p> <p>Although the DDB is retained around the part of the port adjoining Portland Harbour, the neighbourhood plan proposes to remove the DDB from a further six areas further inland. All six areas not only have DDBs, but are also identified in the local plan as ‘key employment sites’, which are protected from other forms of development by Policy ECON2. It is not clear from the neighbourhood plan whether the ECON2 designation would also be removed.</p> <p>The proposed removal of the DDBs from these areas (and the proposed removal of the ECON2 designation, if intended) is a strategic matter that should be considered as part of the local plan review, rather than through the neighbourhood plan. If it is proposed to remove the ECON2 designation, it would be necessary to allocate alternative employment land elsewhere as national policy (para 184 of the NPPF) requires that neighbourhood plans “should not promote less development than set out in the Local Plan or undermine its strategic policies.”</p> <p>It is a matter of concern that the removal of the DDBs would take place ahead of “reviewing a Masterplan for the whole of the Northern Arc Area”. This suggests that the proposed removal of the DDBs has not had regard to the economic implications (especially if it is also intended to remove the Policy ECON2 designation, which would effectively de-allocate these areas of land). This approach could potentially undermine any proposals to stimulate economic</p>	<p>Amend proposed boundaries in the light of comments</p> <p>No suggestion that ECON2 is to be removed. This will be made clear.</p>
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		<p>growth in this part of the Port in advance of the review. Whilst it may be appropriate to undertake such a review, the current DDBs should be retained until the review is completed and there is sufficient credible evidence in place (i.e. from the review) to justify the establishment of revised DDBs. It should also be noted that revised DDBs could not be established through a master plan, as this would not form part of the development plan. They therefore need to be reviewed either through the neighbourhood plan or the local plan.</p> <p>One of the six sites has been built out and is occupied by grain storage silos. There appears to be no sound justification for the removal of the DDB from this developed area on a key employment site, which forms an integral part of the Port's current business.</p>	
Portland Port	EN8	I note that the development boundaries have been removed within the port area and believe that these need to be reinstated otherwise leading to confusion and contradiction with the local development plan	Consider as part of a review of the DDB
DCP detailed	EN8	<p>Additional comments:</p> <p>Land south of Augusta Road – although this is an ‘exception site’, are there any physical / land use reasons why it should be drawn outside the DDB?</p> <p>Land to north of 54 New St – the presence of Japanese knotweed should not, in itself, be a factor in drawing a DDB.</p> <p>Portland Bill – it's not clear what ‘specific planning approvals’ warrant removing the DDB.</p>	Consider as part of a review of the DDB
Community	EN8	<ul style="list-style-type: none"> <li>• I agree with the revised boundaries on Map 7, (though slightly surprised to see that St Georges Church, graveyard and cemetery are included!)</li> <li>• I object to the designation of the narrow strip of land at the Grove</li> </ul>	Little community reaction for or against
DCP	EN9	<p>Policy EN9 includes some elements of a number of design policies from Chapter 2 of the Local Plan but excludes others. Policy Port/EN9 deals with generic design issues, such as scale, materials etc. without adding any more detail or setting out any site- or location-specific design guidance. Consideration needs to be given to whether this policy is needed in the neighbourhood plan and to whether it could be amended to provide clearer local guidance on how design and character issues should be assessed when planning applications on Portland are determined.</p> <p>The existing local plan includes a suite of design policies, which cover many of the generic issues addressed by Policy Port/EN9. Criteria (i) and (ii) draw on elements of local plan Policy ENV12: The Design and Positioning of Buildings. Criteria (iii) and (v) draw on elements of local plan Policy ENV10: The Landscape and Townscape Setting and criterion (iv) draws on elements in local plan Policy ENV16: Amenity. However, some generic design issues addressed in the policies in the local plan do not appear to be addressed in Policy Port/EN9, most notably the retention of trees and other features that enhance local character (see local plan Policy ENV10 (ii) and (iv)) and layout and permeability issues (see local plan Policy ENV11).</p> <p>In addition to the Portland Heritage and Character Study produced to support the neighbourhood plan, the appraisals of all the conservation areas on Portland have been recently updated. These studies provide much detailed local information on the heritage and character of Portland, which can be used to apply the principles in policy to the local area. It is not clear why further area / settlement specific guidance on design and character matters is required, as sought in paragraph 7.53</p>	Review the criteria in the light of comments
Portland Port	EN9	Design and Character - point iii makes reference to the Heritage and Character Assessment. Our concerns about aspects of this document were made available as part of the assessment's consultation. These were not subsequently challenged and therefore it is reasonable to conclude that our position is acceptable. It would therefore be helpful if this can be acknowledged in this section of the Neighbourhood Plan to ensure that the assessment does not risk future development and growth of the port.	Amend supporting text
Community	EN9	<ul style="list-style-type: none"> <li>• I am not quite sure where this comment would fit in to the Plan, but I have been very concerned at the LPA not abiding by the Local Plan policy ENV12 which says that housing should meet National Technical Standards. Planning</li> </ul>	Relate to HS1

		Officers have recommended approval of two developments in Chiswell (at Brandy Row (10 dwellings) and Underhill School (20 dwellings) when some or all of the proposed dwellings have not met National Minimum Space standards issued by the Government (and this has been pointed out in detail to officers). Sometimes the deficit is as much as 25%. Our Neighbourhood Plan give power to the Town Council to resist the building of too small, substandard housing which means will only be fit for holiday homes or lets.	
DCP	EN10	<p>Although the local plan includes policies relating to the re-use of buildings outside DDBs (SUS3) and to residential development outside DDBs, a bespoke policy for the redundant buildings at The Verne could be helpful, given the specific (and very unusual) circumstances in this location.</p> <p>Such a policy should provide clear guidance on what would be acceptable, both in terms of uses and for any scheme for re-use and redevelopment. The supporting text (in paragraph 7.56) refers to a site assessment by AECOM, which perhaps could be used to inform the policy.</p> <p>The redundant buildings have been used for residential purposes in the past, as some of them are houses and others are former accommodation blocks. This past residential use may make it difficult to resist re-use for housing, especially if it is determined that no change of use is required for some of the buildings. This matter needs to be resolved and any policy should clearly set out whether or not residential re-use would be acceptable.</p> <p>Similarly, the policy does not give sufficiently clear guidance on whether demolition, extension and / or new build would be permitted, despite a site assessment having been undertaken. Further consideration needs to be given to whether all the buildings can be considered to be non-designated heritage assets. The accommodation blocks may have a heritage interest, as they clearly form part of The Verne complex of buildings. However, it is less clear whether the two pairs of semi-detached houses have a heritage value.</p> <p>A more detailed assessment of the planning history of the site, the planning status of the buildings and their heritage interest may help to inform the amendment of the policy so that it would provide clearer guidance on what would be acceptable in this location. If the intention is to allocate the site for housing or live/work units it would be the only housing allocation on Portland. The allocation of this particular site, in preference to any others, would need to be justified. The SEA would need to assess the reasonable alternatives and explain why these had been rejected.</p>	Review policy in the light of generally positive comments
Community	EN10	<ul style="list-style-type: none"> <li>• This is significant and is fully supported.</li> </ul>	Support from somebody
DCP detailed	EN11	7.57 If the Heritage and Character Assessment has identified inadequacies in the quality of the public realm and there are many examples of run-down or neglected areas, would it not be possible to identify specific sites where public realm improvements should take place?	Mention possible areas such as gateway locations in supporting text
DCP detailed	EN11	7.58 It is not clear when guidelines on public realm improvements and a common palate of materials will be produced by the Town Council. It is also not clear what status such guidelines will have or how they will be used in the determination of planning applications.	Explore how the TC can put something in place?
Community	EN11	<ul style="list-style-type: none"> <li>• This should include the existing public realm and footpaths, not just new additions; e.g. The footpath up from Quiddles to the coast path has holes in it which have been there since 2010.</li> </ul>	Little community reaction to draft policy
DCC Economy	BE Intro	DCC are supportive of the overall tenet of the growth strategy (Ch 8) as this generally supports the Portland Economic Strategy and Western Growth Corridor Objectives.	Support from DCC
DCP	BE1	The approach to the protection of existing employment sites in Policy Port/BE1 conflicts with the approach set out in local plan policies ECON2 and ECON3. The policies in the local plan draw the distinction between 'key' employment	Review policy impact not just in context of LP but also NPPF

		<p>sites and other employment sites, affording key employment sites greater protection. No such distinction is made in Policy Port/BE1.</p> <p>Local plan policies ECON2 and ECON3 set out a range of different criteria that should be applied in determining whether the loss of employment land should be permitted. None of the criteria in either of these policies are reflected in Policy Port/BE1. Instead this policy only requires a site to have been marketed (unsuccessfully) for 18 months in order to allow its release. The supporting text highlights the need to safeguard employment sites, but it is highly unlikely that this policy will achieve that objective. For example, some sites at Osprey Quay have already been marketed for more than 18 months. On adoption, this policy would effectively permit their immediate release for other uses.</p> <p>This policy is likely to result in the significant loss of employment land to other uses and could have an adverse impact on the overall supply of employment land across the local plan area. This policy should be deleted and proposals for alternative uses on employment sites should continue to be assessed against Policies ECON2 and ECON3 of the local plan.</p>	
Community	BE1	<ul style="list-style-type: none"> <li>• Employment land needs to be protect from being used as housing, to ensure sustainably for the Island</li> </ul>	
DCP detailed	BE3	8.15 This indicates that new business premises should be responsive to the vernacular style and material of the area. Why just materials? What about form, scale & mass?	<a href="#">Add to supporting text</a>
Portland Port	BE3	New business premises – It is not completely clear to me whether this policy is referring to new business premises in addition to those mentioned in preceding policies. If it relates to the new business premises within existing employment sites then I would welcome further discussion in relation to point i. and the reference to highway problems	<a href="#">Note comment</a>
DCP	BE3	<p>Local plan Policy ECON1 supports employment development within or on the edge of a settlement. Policy Port/BE3 has the same approach to the location of development but is inconsistent in other ways. Policy Port/BE3 only permits “new business premises suitable for businesses operating in the area’s acknowledged growth industries”. It is not clear why new premises for other businesses would not be permitted, as there is no such restriction under local plan Policy ECON1. Employment development is defined in the local plan as meaning development within Use Classes B1, B2 and B8. However, it is not clear whether Policy Port/BE3 should be applied in the same way, or whether it would permit a wider range of uses.</p> <p>It’s also not clear what the ‘acknowledged growth industries’ in this area are. Paragraph 8.14 lists a number of ‘growth sectors’ relevant to Portland, which may or may not be acknowledged as local ‘growth industries’. In the event that a sound planning justification can be found for restricting the development of new business premises to ‘acknowledged growth industries’ in this area, those industries need to be clearly defined.</p> <p>Some of the ‘growth sectors’ defined, particularly tourism, leisure, hospitality, health and social care clearly fall outside Use Classes B1, B2 and B8. It would be problematic if these are the ‘acknowledged growth industries’ to which the policy refers, as it would in effect support the principle of the development of hotels, tourist attractions, care homes and any other non-B Class use associated with these industries on land outside, but adjacent to any DDB on Portland.</p> <p>Criterion ii) would not allow such development “where general access would be limited”. It is not clear what ‘general access’ means in this context. It is a major concern if this means vehicular access, as access to Portland Port may be considered to be limited and consequently the policy could have the effect of precluding ‘new business premises’ here.</p> <p>Criterion iv) would not allow such development where it would “result in the loss of dwelling-houses”. It is not clear from this whether a scheme that resulted in the loss of a single dwelling house would be permitted.</p>	<p><a href="#">Policy does <u>not</u> “only permit”</a>  <a href="#">It is not seeking to restrict but encourage</a></p> <p><a href="#">Review supporting text and criteria</a></p>
Burgess on behalf of	BE3	I am instructed to suggest that the land to the West of Easton Lane and to the north of the existing Inmosthay development as shown on the attached plan be allocated for employment development in the community plan.	<a href="#">Note owner’s ambition</a>

Portland Stone Firms Ltd			
Albion Stone	BE3	Looking at the Employment section we would like to include our factory site off Easton Lane as a potential site for the expansion of employment on the Island.	Note owner's ambition
Community	BE3	<ul style="list-style-type: none"> <li>• New start-ups and cheaper rates for SMEs would be good to generate business on the Island</li> <li>• I can understand the sense of the Northern Arc concept, especially for the Osprey Quay/ Castletown /developed Portland Port area. However, I question the value or wisdom of the extension as far as Grove Point. I believe that this land is all in the ownership of Portland Port. However, you will see on map 3 that the East Weares land from north of Kings Pier to well south of Grove Point is SSSI and SAC. You will also know it is instable and moving/slipping, including the old railway line. It is difficult to see how this might be 'developed' and still respect those conservation protections.</li> </ul>	Limited community reaction
DCP	BE4	<p>Policy Port/BE4 gives support to new business centres. However, this policy does not appear to have any locational criteria (i.e. it's not clear whether small business hubs / centres will only be permitted within or adjacent to the settlements on Portland, or whether they will be supported regardless of location.</p> <p>It is not clear why this policy is needed since a small business hub or centre is likely to fall within Use Classes B1, B2 or B8 as will many other 'new business premises' covered by Policy Port/BE3. Policy Port/BE4 should be deleted if, essentially, it duplicates Policy Port/BE3.</p>	Consider whether the policy is needed
DCP	BE5	<p>Policy Port/BE5 is probably not needed since working from home (where it is ancillary to the use of the dwelling house) is permitted development, unless the operation starts to have an unacceptable impact on the amenity of neighbours. Paragraph 8.19 makes it clear that use of part of a dwelling for business purposes would only be permitted if it were to be used by the occupants of the dwelling. If this is the case, any use within an extension or a curtilage building would be ancillary to the main residential use (Use Class C3). It would not constitute a separate office or light industrial use. Not all 'light industrial' uses would be appropriate within a residential area as Use Class B1 is defined as offices (other than those that fall within A2), research and development of products and processes and light industry appropriate in a residential area. In the event that this policy is retained and there is a sound planning justification for permitting extensions or curtilage buildings that are not ancillary to the main residential use, the policy should refer to Use Class B1, rather than 'light industrial' uses.</p>	Consider whether policy is needed and the limitations that should be placed on use
DCP	BE6	<p>This policy offers support for something that is not currently happening and may not happen in the future (i.e. the preparation of a masterplan for the area identified on Map 9). It does not appear to be a firm proposal, but rather an aspiration.</p> <p>The purpose and implications of the policy are unclear, as evidenced by the last sentence of paragraph 8.20 which states "the consequences of this designation and the planning implications are still to be worked out." Furthermore, it is not clear who would prepare the masterplan or undertake the "extensive and inclusive consultation process" outlined in paragraph 8.21.</p> <p>Even if a masterplan is produced, it is not clear what status this would have and how it would be used in the determination of planning applications. The Northern Arc area overlays sites covered by local plan Policies PORT1: Osprey Quay; PORT2: Former Hardy Complex; and ECON2: key employment sites within Portland Port. Policy Port/EN8 of the neighbourhood plan proposes the removal of the DDBs around six of the key employment areas within the Port (although it is not clear whether the ECON2 designation would also be removed). Also Policy Port/HS4 puts forward proposals for the Hardy Block that do not reflect local plan policy or the extant planning permission. Not only are these</p>	Ensure the policy is not in conflict with the strategic policies of the local plan

		<p>neighbourhood plan policies in conflict with the strategic policies of the local plan, they would also prejudice certain outcomes from the master planning exercise proposed by Policy Port/BE6.</p> <p>The policy seeks “to realise the economic and employment potential of the area designated on Map 9”. There is no mention in the policy of the need to protect the environment, despite parts of the site being located within the Jurassic Coast World Heritage Site and subject to internationally and nationally important wildlife designations. Some of the character and heritage issues are briefly discussed in the supporting text (paragraph 8.23), but if the policy is to be retained, then it needs to highlight that any development proposals will have to take account of any environmental impacts.</p> <p>The issues at Portland Port are already covered in Section 8.3 of the local plan. In his report the local plan Inspector considered whether a Port-related policy should be included in the local plan, but he was “not persuaded of the need to do so” – see paragraph 118 at this link - <a href="https://www.dorsetforyou.gov.uk/media/207336/WDWPReport-FINAL/pdf/WDWPReport_FINAL.pdf">https://www.dorsetforyou.gov.uk/media/207336/WDWPReport-FINAL/pdf/WDWPReport_FINAL.pdf</a>.</p> <p>Section 8.3 of the local plan discusses the issues and indicates that the Port is supportive of “developing proactive working arrangements”, but does not prescribe any particular way forward. It is not clear whether the Port is supportive of the designation of the Northern Arc Area and the production of a masterplan as a way forward and it would be inappropriate to propose such an approach without their support</p>	
Portland Port	BE6	Northern Arc – we are supportive of the ambitions of the Northern Arc. It would be helpful though to have some further dialogue regarding the wording and I also note that point 8 (Port/EN9) above is relevant.	Note that Port is supportive of Northern Arc masterplan approach
Community	BE6	<ul style="list-style-type: none"> <li>• I agree with this in principle, though wary of too much reliance on tourism, as it can generate just a small number of low paid jobs, without any other real benefit</li> <li>• Not familiar with the area, but support regeneration for the good of Portland and retention of maritime heritage.</li> <li>• The plan should encourage the old Helicopter Base being used and marketed for transport of cargo from the Port to either the islands such as Jersey and Guernsey or onto the mainland by creating and encouraging the use of airships - which will also encourage tourists</li> <li>• Further focus is needed to encourage business to unused land at Osprey Quay</li> <li>• The Northern Arc appears to include a substantial area of open land above East Weares and on the Verne plateau. This land is of substantial landscape and recreational importance and should be excluded from any development proposals</li> <li>• I can understand the sense of the Northern Arc concept, especially for the Osprey Quay/ Castletown /developed Portland Port area. However, I question the value or wisdom of the extension as far as Grove Point. I believe that this land is all in the ownership of Portland Port. However, you will see on map 3 that the East Weares land from north of Kings Pier to well south of Grove Point is SSSI and SAC. You will also know it is instable and moving/slipping, including the old railway line. It is difficult to see how this might be 'developed' and still respect those conservation protections</li> </ul>	Conditional support from the community
DCP detailed	BE7	<p>Unless a specific need for space and a specific site have been identified, there does not seem to be any purpose to this policy, as it is not a land-use planning matter.</p> <p>Have any specific needs been identified by a further education establishment? If so, maybe those specifically identified needs could be used to inform the policy.</p> <p>It is not clear what ‘relevant’ training and further education opportunities are and how that would be judged in the determination of a planning application for a training or further education development.</p>	Consider whether the policy is necessary
Community	BE7	<ul style="list-style-type: none"> <li>• Young people no incentives minimum wages, instability in education offer creating need for safety net initiatives</li> <li>• Increasing number of minors attending off Island provision</li> </ul>	Some support for the principle

		<ul style="list-style-type: none"> <li>• Employment can be created by the attraction of wealthy investors (plenty in Poole and Bournemouth). Too much emphasis on "deprivation". There may be good motives behind identifying this but continual emphasis on this point means investors will steer well clear. That reduces all potential for more jobs. Lots of very small businesses open up on a shoe string, then close down...they don't have the capital. But many good jobs do arise here on the Island but they are not filled by local people (e.g. pharmacists, vet, teachers...) I am disappointed that "education" specifically is not addressed in this plan. Excuse my tangent...and maybe some of my issues are to take to central government. The national skills shortages are not being met by education (massive recruitment campaign for the NHS is needed for a start). The academic emphasis is inappropriate, the children of our future are not prepared for making career choices (inadequate careers advice and lack of facilitation and encouragement for work experience), nor prepared for making job applications and presenting desirable qualities and skills at interviews. A recent article in Dorset Echo, "Skill shortage key for development" (Jan 16th) "three quarters of businesses in the south west reporting recruitment difficulties." I think employment that relates to the islands tourism potential is optimistic and maybe there is still scope for more apprentice opportunities amid our varied industrial units.</li> </ul>	
DCP detailed	Housing Intro	9.3 It seems unlikely that the lack of suitable housing sites has influenced the projected 2.7% increase in population on Portland to 2031. Typically, these forecasts are based on past population trends and household formation rates, rather than the availability of land locally	Re-word para. slightly
DCP	HS1	<p>Policy Port/HS1 seeks to apply a threshold of five dwellings above which certain criteria would apply. There does not appear to be any justification for this threshold. The Councils apply a threshold of five dwellings in those parts of the local plan area which are 'designated rural areas' above which affordable housing contributions are sought. However, Portland is not a 'designated rural areas' and in any event, Policy Port/HS1 seeks housing of a certain mix and type (by bedroom size), rather than affordable housing. It is not clear why a threshold of five has been chosen, or what evidence has been used to establish it.</p> <p>Criterion i) requires all proposals above the threshold to "help meet local housing need". However, this 'local housing need' has not been defined. Paragraph 9.7 refers to a study which looks at the availability of sites to meet local needs and states that these needs can be met from a variety of sources. However, there is no summary of the findings of this study in the neighbourhood plan and it is not referenced in a footnote.</p> <p>Paragraph 9.3 indicates a forecast growth in population of 2.7% by 2031. Is this the 'local housing need' referred to in the policy? Alternatively, is it the 380 people on the housing waiting list with a Portland connection? The figure for 'local need' that this policy relates to needs to be clearly set out in the policy itself (or the supporting text) with an explanation of how it has been derived set out in the supporting text.</p> <p>Criterion ii) requires that schemes of five or more dwellings "include a majority of small dwellings (1 or 2 bedroom dwellings)." There does not appear to be any justification either for the proportion of small dwellings sought or for the definition of small dwellings. The use of the term "a majority of" may be problematic when applied to schemes. On a scheme of 5 dwellings, 3 would need to be 1 or 2 bedroom units. On a scheme of 6 dwellings, 4 would need to be 1 or 2 bedroom units as 3 would only constitute 50%, which would not be a 'majority'. Consideration needs to be given to whether a numerical percentage figure would be more appropriate.</p> <p>Criteria iii), iv) and v) deal with design matters that are already addressed by policies in the local plan and may not be needed. It is not clear why these design-related criteria should only apply to schemes of five or more dwellings. Shouldn't schemes for 1 to 4 dwellings also have 'sufficient' off-road parking, bin storage and private amenity space?</p> <p>Criterion iii) seeks the provision of sustainable drainage systems, where practicable. Such systems are already sought by paragraph 2.4.7 of the local plan.</p>	<p>Strengthen the threshold requirement in the Plan and reference to local need</p> <p>Re-word policy</p>

		Criterion iv) requires 'sufficient' off-road parking for housing. Local plan Policy COM9 already requires provision to be made in accordance with the methodology in the Bournemouth, Poole & Dorset Residential Car Parking Study. It is not clear if 'sufficient' in this context means provision in accordance with the study or whether it has some other meaning. Local plan Policy ENV11 already seeks the provision of adequate bin storage and private amenity / garden space.	
Community	HS1	<ul style="list-style-type: none"> <li>• Social housing is desperately needed for local people.</li> <li>• The government say we need more houses, there must be a balance. We don't need second homes, we need social housing for local people and affordable housing for local people.....But we need the Doctors, schools, parking. to support them.</li> <li>• Housing, 9.6 I am concerned at the lack of provision of care homes on Portland. Too often the elderly are taken to Weymouth and it isolates them at a vulnerable time in their lives. We have Foyle Bank, which is assisted housing and is excellent, but they can only offer a limited number of places.</li> <li>• Our daughter is a primary school teacher in Weymouth and is trying to get on the housing ladder. Why have we not got available 'key worker' homes in the area? We need to attract more 'key workers' and part of the solution would be affordable housing for them.</li> <li>• Yes, development proposals should be aimed at meeting local needs or should be required to demonstrate why not. We need all development land to be first and foremost for houses for local people, not speculative profiteering.</li> <li>• It's important that Portland's uniqueness, character and environment is protect from unsympathetic housing developments. There is a need for housing however these schemes need to for local people so that a sense of community can continue and not for second homes which has greatly increased in some areas of Portland.</li> <li>• Housing type should be in keeping with the type of various villages. No super modern houses.</li> <li>• I support the statement housing development on Portland needs to meet local and affordable housing needs. This is certainly not happening at the present. Brownfield sites are being developed in the creation of second homes. There is not a shortage of houses on Portland – just badly managed development of superfluous housing</li> <li>• Elderly care, key workers, environmental issues at school sites, infrastructure and community facilities</li> <li>• St George's school site (possibly 57 dwellings). Not appropriate as the school needs this area for its pupils. I like the idea of 50% affordable housing- if only the developers can be made to stick to that plan. There are a lot of houses to be built which raise some serious concerns for me.</li> <li>• The local doctor's surgery is already to capacity and it appears that currently we are unable to attract GPs. I appreciate there is a national shortage.</li> <li>• The Atlantic Academy being the only senior school has already had to reduce its annual intake of pupils due to having to build interior walls within the school.</li> <li>• The impact of extra residents on these two services alone is going to be huge.</li> </ul>	Note community feelings and make reference in supporting text
DCP	HS2	Policy Port/HS2 indicates that self-build or community housing schemes would be permitted on 'exception sites'. The supporting text refers to the Issues and Options consultation for the local plan review and discusses one of the options being considered which is to permit self-build on 'exception sites'. However, Policy Port/HS2 does not reflect what is being suggested through the local plan review. Essentially this is seeking to allow a proportion of self-build on an exception site to support the provision of affordable housing to meet local needs. However, Policy Port/HS2 is seeking sites for 100% self-build or community housing schemes with no 'conventional' local needs affordable housing. The non-market homes suggested in the policy would allow such dwellings to be sold on the open market after 5 years. This arrangement may not fall within the definition of affordable housing set out in the glossary in the current NPPF (unless the resale is restricted), although it is recognised that this definition may change as a result of the review of the NPPF. In particular it is not clear what is meant by 'community housing schemes' in the policy. Does this mean	Focus policy only on community-based schemes

		<p>'community-led housing schemes' as referred to in paragraph 9.14? This seems to include a wide range of projects, some of which would fall within the national definition of affordable housing and some which may not.</p> <p>There are perhaps two options for seeking to take this policy forward. The first would be to adapt the policy to fit in with local plan Policy HOUS2: Affordable Housing Exception Sites. If the policy were to be taken forward in this way, it would have to be amended to permit only a limited proportion of self build / community housing alongside local needs affordable exception housing. Policy SUS2: Distribution of Development seeks to 'strictly control' development outside DDBs, but does allow a range developments as set out in Criterion iii) including 'affordable housing'. The supporting text to Policy HOUS2 also indicates that market housing cross-subsidy may be acceptable on such sites, if promoted through a neighbourhood plan. A policy of this nature could, subject to the views of an examiner, be considered to be aligned with the strategic policies of the local plan.</p> <p>The second approach might be to develop a stand-alone policy promoting self-build and community housing as exceptions outside DDBs. This may be more problematic in terms of demonstrating compliance with the strategic policies of the local plan because self build is not listed in criterion iii) of Policy SUS2 as an appropriate use outside DDBs.</p> <p>The policy indicates that non-open market plots should be transferred to Weymouth &amp; Portland Borough Council or a Registered Social Landlord at no cost. The Council no longer has any stock of council houses, so it would be unlikely that it would take on such plots.</p> <p>Would open market housing only be permitted on self build or community housing exception sites on Portland, or would it also be permitted on conventional affordable housing exception sites? This needs to be tackled in any amended policy, or policies.</p> <p>There does not appear to be any justification for allowing 50% of homes on self-build exception sites to be open market dwellings. How has this figure been derived: is it from an assessment of viability? It may be that some exception sites may not require 50% market homes to make them viable, especially if a scheme was able to attract some form of grant funding. If the policy was amended to say that the minimum amount of market homes to make the scheme viable would be permitted up to a maximum of 50%, it would maximise the amount of affordable housing delivered, more closely reflecting the aims of local plan Policy HOUS2</p>	
DCP Detailed	HS2	<p>The term 'small site' in criterion i) needs to be defined in the supporting text. Criteria ii) and iii) largely omit landscape considerations other than openness. Criterion iv) requires compliance with Policy Port/EN10, which relates to The Verne. Should this not require compliance with Port/EN9, which relates to design and character?</p> <p>In relation to the issue of design, do you want to include some requirement for a Design Framework for self-build sites? In criterion v) what is a sustainable 'operational element'?</p>	Review criteria in light of revised policy
Community	HS2	<ul style="list-style-type: none"> <li>• Housing no mention of Social Housing with wages being so low in our community many young people will not be able to access Council Housing. Consideration a housing cooperative also.</li> <li>• Yes, I agree this tightly defined 'exception'. In general, we need to keep development within the boundaries of Map 7 to retain separation and distinctiveness between settlements and avoid the Island being completely built upon.</li> <li>• Since the consultation on the Portland Plan was launched government has announced that it is proposing a total ban on new leasehold premises.</li> <li>• Restore all empty premises. Convert to apartments or restore to homes. Earmark an area for senior living. Potentially somewhere around Castletown area? Development not unlike the Weymouth Harbour Lights Court. Characterful fitting in with the area. No hills to climb. Near to hospital and doctor surgery. Local store. Osprey Fitness.</li> <li>• Aster who owns land in Fortuneswell should be encouraged to develop unused land like garages to additional houses</li> <li>• New Homes – Verne Common</li> </ul>	Little support from the community

		<ul style="list-style-type: none"> <li>• Perhaps mix self build in community housing secondary and further education to enable educational grade people to</li> <li>a) Learn a trade/speciality e.g. lime plastering and upkeeping of traditional stone buildings with the community housing scheme by building a new building rather than anonymous typical development housing companies to have an economical hold on the Island. This is a form of empowerment that will have far reaching social effects that are probably difficult to quantum.</li> <li>• No, the Island has enough housing. Maybe a small area for locals trying to buy</li> </ul>	
DCP	HS3	<p>DCC area profiles show the following levels of second home ownership based on 2016/17 Council Tax Records:</p> <ul style="list-style-type: none"> <li>• West Dorset – 5%: <a href="https://apps.geowessex.com/stats/AreaProfiles/District/west-dorset">https://apps.geowessex.com/stats/AreaProfiles/District/west-dorset</a></li> <li>• Weymouth &amp; Portland – 3%: <a href="https://apps.geowessex.com/stats/AreaProfiles/District/weymouth-and-portland">https://apps.geowessex.com/stats/AreaProfiles/District/weymouth-and-portland</a></li> <li>• Portland – 3.4%: <a href="https://apps.geowessex.com/stats/AreaProfiles/Parish/portland">https://apps.geowessex.com/stats/AreaProfiles/Parish/portland</a></li> </ul> <p>The supporting text to Policy Port/HS3 refers to a similar policy being introduced in St Ives, Cornwall. However, the evidence behind that policy shows that second homes are much more of an issue in St Ives. That neighbourhood plan states:</p> <p>“St Ives and Carbis Bay are in the top five settlements in Cornwall with the highest proportions of second homes and holiday lets. In 2011, 25% dwellings in the NDP area were not occupied by a resident household - a 67% increase from 2001. Over this same period, housing stock in the NDP grew by 684 or 16%, but the resident population grew by only 270 or 2.4% and the number of resident households grew by less than 6%. The growth in housing stock in the NDP area between 2001 and 2011 was double the average across England.”</p> <p>This raises the question of whether a second homes policy for Portland is needed or could be justified. There does not appear to be a significant impact currently and there is no assessment of how many additional second homes could be accommodated on Portland before adverse impacts started to be felt. In the event that there is insufficient evidence to justify a second homes policy for Portland as a whole, consideration could be given to whether such a policy could be justified more locally, but that would also need to be supported by evidence.</p> <p>Paragraph 9.16 refers to the appeal of Dorset “to the second home and holiday let market”, as being part of the problem. Is it therefore intended to prevent any new market housing being let as holiday accommodation? New holiday cottages, which may be owned as a second property, would provide accommodation for tourists and would contribute to the local economy. Clarification on this point is required.</p> <p>Policy Port/HS3 seeks to prevent “new open market housing, including replacement dwellings”, from becoming second homes. This raises the question of whether existing buildings could be adapted and re-used as second homes and/or tourist accommodation under this policy. These uses would be allowed, subject to certain criteria, under Policy SUS3 of the local plan.</p> <p>The final sentence of the policy states that “new unrestricted second homes will not be supported.” A home which is used as a second home would fall within the same use class (Class C3) as a home that was used as a primary residence. There is, therefore, no such thing as an ‘unrestricted second home’ in planning terms. This sentence should be amended or deleted.</p> <p>In the event that a second homes policy is taken forward, it would be important for the neighbourhood plan to set out how the restriction of occupancy to ‘principal residences’ would be controlled. The supporting text should set out that this would be controlled by planning agreement or condition. In St Ives, the following condition is used:</p> <p><i>“Condition:</i>  <i>The dwellings hereby permitted shall not be occupied otherwise than by a person as his or her only or Principal Home.</i>  <i>For the avoidance of doubt the dwellings shall not be occupied as a second home or holiday letting accommodation.</i>  <i>The Occupant will supply to the Local Planning Authority (within 14 days of the Local Planning Authority's written</i></p>	<p>Consider whether there is sufficient evidence to justify proceeding with the policy in light of the problems highlighted</p>

		<p><i>request to do so) such information as the Authority may reasonably require in order to determine whether this condition is being complied with.</i></p> <p><i>Reason: To safeguard the sustainability of the settlements in the St Ives NDP area, whose communities are being eroded through the amount of properties which are not occupied on a permanent basis and to ensure that the resulting accommodation is occupied by persons in compliance with policy H2 of the St Ives Neighbourhood Plan 2015 - 2030.</i></p> <p><i>Informative: This condition shall not preclude periods of occupation by visiting guests but those visiting guests will not individually or cumulatively contribute towards the occupation of the property as a Principal Home. The condition will require that the dwelling is occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the condition, and be obliged to provide this proof if/when the Local Planning Authority requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc.)."</i></p> <p>In the event that a second homes policy is taken forward, it would be helpful if the supporting text defined what is meant by the term 'Principal Home' and clarified the position in relation to use as holiday letting accommodation. It would also be useful to set out how proof of 'Principal Residence' would be verified by the Local Planning Authority, in order to ensure that such a restriction would be enforceable. Some of these legal issues are discussed in more detail here - <a href="https://www.lawgazette.co.uk/practice-points/planning-blocking-second-homes-in-st-ives/5055252.article">https://www.lawgazette.co.uk/practice-points/planning-blocking-second-homes-in-st-ives/5055252.article</a>.</p>	
<p>Burgess on behalf of Portland Stone Firms Ltd Betterment Properties (Weymouth) Ltd Fortuneswell Developments Ltd Imago Developments Ltd</p>	<p>HS3</p>	<p>You will appreciate that the above companies are either substantial landowners on the island and/or have regularly built new housing on the Island.</p> <p>They object to the proposed policy on the following grounds:</p> <ol style="list-style-type: none"> <li>1. There has been no prior consultation with my clients on the matter –as might be expected on such a significant issue -with major local builders and landowners.</li> <li>2. There appears to have been no technical survey or information gathering exercise amongst local builders to determine the extent of the alleged problem of new homes being occupied as second homes –if indeed there is any problem at all.</li> <li>3. There appears to have been no proper investigation for example by professionally qualified surveyors or valuers into the likely effect of such a policy in terms of <ol style="list-style-type: none"> <li>a. Impact on house building rates on the Island</li> <li>b. Impact on Affordable housing provision</li> <li>c. Impact on house prices on the Island both on new build housing and on the existing housing stock which would have no such restriction (and might therefore be expected to increase in price).</li> <li>d. Impact on the ability of local people to get mortgages on new build houses.</li> </ol> </li> <li>4. There appears to have been no consideration of the impact of such a policy on the local community. For example, if the existing housing stock were to become more expensive as a result of this policy would this result in small homes and cottages in the centre of Portland's villages becoming financially out of reach of even more young people?</li> <li>5. There appears to have been no proper consideration as to how enforceable such a restriction would be, who would enforce it and whether the principal council would have the resources (and the inclination) to do so.</li> <li>6. There seems to have been no consideration as to the costs in both monetary terms and time delays of such a policy. For example, would a s106 Agreement be required on each and every application, who would bear the costs of such an agreement and how much further delay would that create in an already chronically inefficient system.</li> </ol> <p>For all the above reasons my clients would object to the above policy and ask that it be deleted from the Plan. We do of course reserve the right to expand upon the above points at any Neighbourhood Plan Examination if necessary.</p> <p>I would be obliged if you would acknowledge receipt of this representation</p>	<p>Note that private development sector is not happy with policy and its likely impact</p>

Community	HS3	<ul style="list-style-type: none"> <li>• Yes, I think a second home policy is really critical to maintaining a strong and vibrant resident community here, and keeping house prices within the reach of local people. My question is does the term 'second homes' include newly built buy-to-holiday let properties? Too many of these also dilutes and fragments the local community through non-year-round residence (there are now 6 second homes or holiday let in my street of 26 houses). So how does this policy relate to Policy ST1 which seems to conflict with it?</li> <li>• The proposed occupancy test is fully supported.</li> <li>• Second Homes Para 9.15 – 9.17 Tricky one. I think there is the need in such a small location, to know that the majority of houses are lived in, and ideally, people of working age, are working in the area. This is what provides the momentum for other businesses to open / survive. I think it's well documented that when a small area has too many second homes, it effectively dies.</li> <li>• Will new developments fall into the hands of second home buyers? There should be an evaluation and restrictions put into this area of housing. Portland could potentially become a silent ghostly quiet island if these new builds are sold to second home buyers. What is the point of building all these new houses if they are being sold on to part-time residents, so they sit empty most of the year. Emphasis should be on selling to locals at affordable prices with existing local amenities to support them, i.e. schools, dentist, doctors. (point 9.3-9.6). Extreme I know, but how can a community begin to regenerate, thrive and survive if there are no locals left on the island! How can businesses be created and survive with lack of community to use them or be involved in them.</li> <li>• Second Homes should be discouraged- more for local retirement homes with care facilities</li> <li>• No</li> <li>• I support the establishment of second homes policy that deters second home ownership.</li> <li>• It is necessary to restrict the growth of second homes. Because most of these are now being let to people who cannot buy, these rents are beginning to creep up. Any new building should include homes for rent. Land outside the area for community projects should be identified and used.</li> <li>• There is a great need for more social housing which should be given preference to housing built speculatively for sale. New housing development should take place as far as possible on brownfield sites including shop premises which are no longer commercially viable. I strongly support Policy HS3</li> <li>• Yes, a viable community requires the great majority of housing to be occupied all year round</li> <li>• Link housing to S106 employment provision generation</li> <li>• Have not fully investigated housing sites and I need to read about "the hardy block" About second home owners, they pay a contribution via council tax. I feel their numbers should be monitored but how excessive in number is considered too many and what can you do about it? Truly affordable housing for many would be to have more low rent council/housing association homes, they're too scare nationwide.</li> </ul>	Substantial community backing for 2 <sup>nd</sup> homes policy
DCP	HS4	<p>The Hardy Complex has an extant planning permission and as the scheme has been partly implemented it will not lapse. Local plan Policy PORT2 reflects this position and recognises that, if fully implemented, the site would provide 384 additional dwellings. This number of units is also mentioned in Table 3.7 of the local plan as forming part of the supply of housing for the local plan area.</p> <p>Policy Port/HS4 supports proposals that would reduce the height and visual impact of the Hardy Block. However, any such proposals would be likely to reduce the amount of housing delivered on the site. Without additional housing provision being made elsewhere on Portland, this would undermine the strategic policies of the local plan and result in the neighbourhood plan promoting less development than set out in the local plan, which would be contrary to paragraph 184 of the NPPF</p>	Ensure the result of the policy is not a Plan that promotes less development than set out in the Local Plan
Community	HS4	<ul style="list-style-type: none"> <li>• Yes, I would agree to retaining the Hardy Block but lowering its overall height as a means of securing more housing but with less visual impact in the approach to the Island.</li> </ul>	Community support for the policy

		<ul style="list-style-type: none"> <li>• Hardy Block is an eyesore. Knock it down and build something beautiful and characterful. A mix of community for seniors with communal area and supported living with recreational area. Affordable flats for first time buyers within the vicinity also? (Weymouth Harbour Lights development). Don't redevelop existing schools re develop derelict buildings.</li> <li>• The Old Naval Block which has continually remained undeveloped should either be forced to be developed or knocked down and local housing created</li> <li>• Hardy Block Use for Community Housing</li> <li>• The Hardy block 15+ years a real eyesore and not a good advert for the Island especially as Castletown is thriving will the D Day Museum and cruise ships coming in.</li> </ul>	
DCP Detailed	Transport Intro	10.4 Is there any realistic prospect of a new rail link being provided to the Island?	Consider re-wording
Portland Port	Chapter 10 – Transport	<p>a. I think it is important to make reference to the Jurassic Coast Highway. It was clear from the event we held in November that there was a growing recognition of the need and it was now a case of how do we deliver. A transport consultant also showed that it was still possible to commence the road at Ferrybridge despite the approved planning application for adjacent development.</p> <p>b. Regarding paragraph 10.10 we are not in a position to be able to accommodate a publicly accessible road through the port and feel that if there is the need to reference the desire then it must include the ports position on this matter and can provide some suitable words for inclusion</p>	Include reference as suggested
Community	Transport Intro	<ul style="list-style-type: none"> <li>• 10.3 The tone of this paragraph suggests that the low car ownership level is a problem that needs to be addressed by providing more parking. Instead it should be praised as a way that the community are making a positive contribution to the environment. A scheme to reward zero-car households could be devised, perhaps by handing out vouchers for bus season tickets.</li> </ul>	Amend text
DCP Detailed	TR1	This policy supports the development and maintenance of public transport links. Should it not also support improvements?	Revise policy to include improvements
DCP Detailed	TR1	10.8 Is there any realistic prospect of a rapid transport link from the island to the mainland?	Rhetorical comment
Community	TR1	<ul style="list-style-type: none"> <li>• A bypass would help!</li> <li>• A one lane road access to and from island is becoming more and more congested. Reinstate a train or tram? I am not over familiar with this area of transport. I drive a car but would not be able to get to work early in the morning if I had to use public transport. Connecting links with Weymouth or extended routes to places i.e. Sainsbury, Asda and other essential stops.</li> <li>• There is no land for car parks around the villages. Public transport on and off the Island needs another road. This is the only solution.</li> <li>• We need to have a service along Weston St which would be easy to arrange using a small deviation from current routes to include Wakeham where many elderly people live.</li> </ul>	A few suggestions from the community
DCP Detailed	TR2	The policy is generally supportive of improvements to the transport network and paragraph 10.9 sets out a number of locations where improvements are required. Have schemes been designed for the improvements in any of these locations, and if so, are any of these schemes included in a programme for implementation before 2031?	Establish whether there are any schemes to refer to
DCP Detailed	TR2	10.10 The Incline Road is within a secure area of Portland Port and so is highly unlikely to be deliverable. Has a scheme been designed for this proposal and if so, is it included in a programme for implementation before 2031?	Amend reference to mention security issue

Community	TR2	<ul style="list-style-type: none"> <li>• This proposal is fully supported.</li> <li>• Fortuneswell has an increasing amount of traffic passing through as it is the only through route onto the Island. I do not know of an alternative route being new to the Island. 10.10 is a good option I was not aware of. Open to options</li> <li>• Transport infrastructure needs drastic improvement - a western relief road adjacent to the Fleet around Weymouth to ease traffic flow into Portland, with a road tunnel by-passing Underhill bringing traffic up to Tophill.</li> <li>• I support comments made in the plan about the current and in my view unacceptable and dangerous levels of traffic in the Island hotspots mentioned. Why encourage more vehicles ie opening the Port road. The High St is already dangerous for pedestrians and is the only egress from Tophill and parts of Fortuneswell (nb air Pollution).</li> <li>• Number of school children on buses to Wyke and Southwell, bus stop at Chesil Beach centre, Car park at Royal Manor, Village car parks for HGV Goods vehicles vans, Access to Island (repeatedly), Charge for overnight camping direct to camp site, bus services into Osprey Quay area increasing local leisure offer around Marina.</li> <li>• Foresight is needed to deal with increasing tourism Could do with the Merlin group to next fund cable cars from the Nothe to the Jail House cafe...or Heights Hotel?! It seems to work well getting people from Singapore to Sentosa Island (just a big investor needed) Jurassic themed Jeep transport would be a great and fun way to get tourists over to the island (as are the open top buses...only weather permitting!) Good to promote the existing boat service, but ideally it would link in with a hop on hop off island bus tour...or add any other enjoyable incentive to get people to leave behind their car. This would alleviate parking issues.</li> </ul>	Community support to refer to
DCP Detailed	TR3	<p>Local plan Policy COM9 seeks parking provision in accordance with the methodology set out in the Bournemouth, Poole and Dorset Residential Car Parking Study. The first part of Policy Port/TR3 may not be needed, or if retained, should refer to local plan Policy COM9.</p> <p>The second part of the policy seems to offer blanket support for the provision of additional public car parking areas. This approach may not be appropriate in all circumstances, especially if it is likely to encourage greater levels of car usage.</p> <p>The detailed criteria (i to v) do not take into account impacts on the landscape</p>	Amend reference in first part Consider criteria revisions
Community	TR3	<ul style="list-style-type: none"> <li>• Parking issues. Extreme lack of parking in Underhill area. Especially Clovens Road and surrounding roads connecting.</li> <li>• Stop giving planning permission for family 3-6 bed houses with space for only one car! i.e. (10.14) Underhill School.</li> <li>• Do not allocate existing car parks for re development.</li> <li>• Park and ride scheme for tourists.</li> <li>• In order to sort out parking we also need to clarify rights for those who own homes with drive ways/ garages. Vehicle users including neighbours and other locals show lack of respect for those who pay a premium for homes with vehicle access and higher council tax - garages/driveways are not free.</li> <li>• White lines alongside drop kerbs are routinely ignored making entry and exit to garage/driveways both difficult and potentially dangerous. It is also very expensive to get a white line replaced when it is gone often as a result of road repairs or deterioration.</li> <li>• Access rights need to be addressed - how can it be right that a garage owner has right of exit but no right of access according to UK laws? I assume the same applies to driveways? If it doesn't apply to driveways, then the inconsistency needs to be addressed.</li> <li>• Given the above, how can it be right that a family without driveway or garage and therefore lower council tax have five cars that they expect to park in Reforne? Parking permits are not the answer unless there are marked bays. Should there be a maximum of two cars per household with others parked in communal car parks for instance?</li> <li>• Additional problem for Reforne residents is that residents of other roads such as Grosvenor use Reforne to park exacerbating the problems.</li> </ul>	Parking problems highlighted by community

		<ul style="list-style-type: none"> <li>• Perhaps in areas where residential parking is limited or residents' road alleys. Allowing people to have park on pavements and or using concrete partial slabs as has been partially done at the Chesil Beach Centre</li> <li>• Fortuneswell area, not much parking for those who live down high street, King St, Mallams etc</li> <li>• Parking in Grove Rd is a problem and public car park would benefit the area</li> <li>• Use sports symbols on brown signs to indicate provision opportunities</li> <li>• Conversion of shops to housing adding to car parking issue particularly Fortuneswell</li> <li>• Car parking is without doubt the bigger issue during the summer season (prevention better than cure, better for economy, better for the environment, we should not really be building more car parks if we can help it).</li> </ul>	
Community	TR4	<ul style="list-style-type: none"> <li>• I have already submitted my reservations about the larger scale (e.g. Jurassica) developments and their impact on an already choked road system. I have strong objections to encouraging Portland as a destination for more mountain biking (and also trail biking). Both of these are having a negative impact on footpaths, as well in sensitive conservation-designated quarries where off path/road biking is frequent and hugely destructive. Climbing, watersports and walking all fine.</li> <li>• This proposal is fully supported.</li> <li>• I have commented before on the increased regular use of footpaths by horse riders, including by riding schools, and by mountain bikers. I would welcome a solution which enables footpaths which have a good compacted stone base being used by cyclists/riders as well as walkers so that the surface remains firm and walkable. However, some footpaths are soft and muddy and have become very muddy and widened by horses/cyclists avoiding the muddy patches they have created. It must be recognised that some footpaths e.g. West cliff from Southwell Business Park to the Bill, including the Bill fields, and from the Bill to Sandholes Crane go across very sensitive ground with multiple environmental protections. These are getting badly eroded by illicit use and should only be used by walkers.</li> </ul>	Note community concerns about over-use
DCP	SS1	<p>Policy Port/SS1 appears to be applicable to all shops, whether or not they are in a local or district centre. It may be more appropriate to develop different policy approaches to shops in local or district centres and to individual shop units outside such centres.</p> <p>Local plan Policy ECON4 relates to retailing and town (district and local) centres and seeks to retain a high proportion of shops in such centres. Policy Port/SS1 is more restrictive as it seeks to retain all shops, subject to certain criteria. In the context of a centre, it may not be appropriate to allow the loss of a shop, subject to the provision of alternative shopping provision 'nearby', as allowed under criterion i). Potentially this could result in a key shop unit in a defined centre being lost and replaced with a larger retail unit outside the centre, which could adversely affect the vitality and viability of that centre.</p> <p>Criterion ii) may permit the loss of a shop if it is replaced by a community service. However, it would not allow the shop to be replaced by other town centre uses, such as banks, offices, pubs, cafes or take-aways. This approach seems unlikely to support the vitality and viability of local or district centres.</p> <p>It appears that the loss of a shop would be permitted under criterion iii) if it had been empty and marketed (unsuccessfully) at the current market rate for 18 months. There may be circumstances where this approach would not help to secure the retention of shops, for example: in a period of severe recession; where a new shop unit has been provided as part of a new housing development which has yet to be built; or where the shop is a key unit or site in a local centre. Rather than having to refer back to Policy Port/BE1 to understand the marketing requirements, it would be more helpful to set them out in full under criterion iii), if this criterion is retained.</p>	Merge policy with BE1
Community	SS1	<ul style="list-style-type: none"> <li>• Retain the hospital. Add departments needed... create a training hub! The NHS is at breaking point...</li> <li>• Force individuals to upkeep from of units when not being rented. It looks shabby and has a general depressive effect on the rest of the roads</li> </ul>	Limited community response

		<ul style="list-style-type: none"> <li>• There does not seem to be mention of our Portland Hospital which provides essential service. The lack of weekend cover in the Minor injuries seems to be a backward step when we have so many people doing risky activities at the weekend</li> </ul>	
DCP	SS2	<p>Policy Port/SS2 defines Easton as a local centre. However, the supporting text (paragraph 11.8) suggests that Easton should be regarded as a district centre. The neighbourhood plan needs to be clear about how Easton should be categorised. Policy Port/SS3 defines four local centres. Easton and Fortuneswell are also identified as local centres in the Issues and Options Consultation Document for the local plan review. However, Castletown and Chiswell are not. A retail study is currently being prepared and this will examine these areas with a view to categorising them within the hierarchy. The results of this study should be used to inform any revisions to Policy Port/SS3.</p>	<p>Review text to ensure it presents what the community feels and wants (as reflected in comments below) Revise title to 'neighbourhood centres' to avoid confusion</p>
Community	SS2	<ul style="list-style-type: none"> <li>• Reinforcing Local Centres Paras 11.8 – 11.10 I agree with the idea of retail centres, though depending on what types of shops will affect how valuable / sustainable they are. The approach to tourism may also affect the kind of shops.</li> <li>• Easton feels like the district centre, although many of the shops seem to be very tired looking and old fashioned. Personally, I am not encouraged to shop in the area due to lack of interest in shops available. White stones cafe is fantastic, with combined cafe and art gallery.</li> <li>• Local businesses. . A hub in the shopping centre of the local art and crafts, produce?</li> <li>• I have seen pop up shops appear around Christmas where I used to live. Some are now thriving!</li> <li>• Summer fayre/fate in Eastern Gardens?</li> <li>• Advertising! I have been here a year and notice that Portlanders do not shout about their talents. Broader advertising for businesses, craft fairs and events. Advertise further afield. Bridport-Bournemouth. Tea in the park events in the gardens! . Not a big music festival but a local event with local talent in the gardens.. charity event to raise money for something... locals.</li> <li>• Open air cinema night! Perhaps not the right area?</li> <li>• Many locals leave the island for school and work every day. How can the vitality of the area improve if locals go elsewhere?</li> <li>• Fortuneswell has great potential for a creative hub, not so much as the island centre. Brackenbury School could be a potential opportunity for this to help cement a hub in the area. workshops, Specialist schooling.</li> <li>• There are no details which sets out a plan to encourage coffee shops and restaurants in the old port</li> <li>• Old shops which are left empty should be redeveloped and upgraded to encourage 'boutique' shops like a bakery etc</li> <li>• New shops i.e. clothes and jewellers</li> <li>• Easton has been destroyed over the last few years. Banks have gone. Post Offices are held in a Newsagents, Butchers we have just one. Shoe shops, Spar, (We have now 3 charity shops), Sports shop, electrical. It's too late for suggestions. Fortuneswell once a thriving community is like driving through a deprived area.</li> <li>• How can you make Easton a District Centre when you can't park?</li> <li>• Centralise retail offer in Fortuneswell to offer more viability</li> <li>• Easton is, I suppose, the district centre. That does rather write of Underhill though. Tesco, which I initially supported, have trampled on the toes of every Easton business, they sell flowers, cards, books, pet food, electrical goods, toys and papers. Tesco draws people to Easton. If they only sold a good range of supermarket FOOD (as many would have presumed), instead of conveniently supplying time-pressed customers with everything else too, who otherwise would have had to whizz around and support the small surrounding businesses...instead they keep closing or are maybe very close to that. What can be done about that, I really don't know.</li> </ul>	<p>Comments will help reinforce policy approach</p>

DCP	CR1	Policy Port/CR1 lists a number of sports and recreational buildings and land, which should be afforded protection in accordance with Local Plan Policy COM5. Some of these sites are owned / managed by Weymouth & Portland Borough Council. Portland Town Council has written separately to the Borough Council to seek views on this policy and the sites it relates to. There is no objection to this policy being applied to any of the sites owned / managed by the Borough Council.	Note support
DCC Children's Services	CR1	<p>Policy No Port/CR1 Protecting Recreation Spaces (page 59)</p> <p>Whilst we appreciate the Plan, and the Town Council's wish to protect these assets our views are as follows.</p> <p>St George's School Playing Fields.</p> <p>It is our view that they do not need to be included as they are already protected under Section 77 of the School Standards and Framework Act.</p> <p>This means that in order to dispose of these playing fields we would need Secretary of State approval.</p> <p>We would be concerned if as identified the playing fields were afforded additional protection under CR1 if this compromised any future needs of the school or education needs albeit it appears that Com 1 recognises this eventuality.</p> <p>Western Road Recreation Ground. – As you will be aware we are in the process of entering a long term lease with the Town Council.</p> <p>In this respect this site is afforded protection and identification under CR1 appears unnecessary.</p> <p>Royal Manor Playing Field / Tennis Court</p> <p>The part of the site under which minerals are currently being extracted (the tennis courts and sports field) is under offer to the Homes and Communities Agency with the expectation that the land will be developable in 2019/20 when Albion Stone have completed their backfilling of the mine.</p> <p>We are in the process of agreeing a deferred payment arrangement and are looking to conclude the sale soon. At present it should not be promoted as having continued use by the Town Council. – the HCA will obviously be looking to develop the site with a mixture of housing as is their remit. I'm sure there will be green space within any development but it must be acknowledged that it is unlikely to remain as it is now and should not be included under the policy.</p>	Take the views of DCC into account
Community	CR1	<ul style="list-style-type: none"> <li>• I was surprised that the Victoria Square Entrance Green is not included in the Recreation Spaces list: I understood that it was specifically given to the people of Portland to replace the loss of Officers Field. I see that it is included as a Local Green Space and hope that it will remain protected and open (Incidentally - it has a very healthy breeding population of hedgehogs which I find surprising given the lack of cover but delightful!)</li> <li>• Fully support the protection of recreation space, both land and buildings. Suggest that the tennis courts and bowling at Victoria Gardens are included in the list. I appreciate Victoria Gardens is included in the Local Green Spaces (Port CR/2), however I feel the sporting facilities at Victoria Gardens should be recognised under this policy as well.</li> <li>• There are hundreds of new homes being built, with potentially many families moving in with children. Why demolish all the empty schools! Make use of them back as schools or community use with option of changing back to school use. workshop units. Craft centre...</li> <li>• An outdoor activity base/hub for equipment, clothing abseiling, wall climbing</li> <li>• hiking, paragliding, cycling hire?</li> <li>• Mountain biking</li> <li>• Indoor abseiling and activity centre/outdoor abseiling centre.</li> <li>• Action adventure centre for children and adults</li> <li>• Indoor activity centre</li> <li>• Old Senior school hall</li> <li>• All Recreational spaces should be protected</li> <li>• Community Hub at New Brackenbury, Loss of youth centre, Easton library as a hub,</li> </ul>	Community support for protecting recreation spaces

		<ul style="list-style-type: none"> <li>Bring back a play area on the West Weares. Find funding for some fun Dinosaur themed climb on items down at the bill. Keep all the green spaces and Portland still needs more trees and flowers...but it's got better.</li> </ul>	
DCP	CR2	<p>Policy Port/CR2 proposes a number of sites for designation as Local Green Spaces. Portland Town Council has written separately to the Borough Council to seek views on the proposed Local Green Space designation being applied to a number of sites owned / managed by the Borough Council. There is no objection to this policy being applied to any of the sites owned / managed by the Borough Council. However, it should be noted that Easton and Victoria Gardens are leased from the Court Leet and Weston Green / Gooseberry Green are not the Borough Council's responsibility. Paragraph 37-019-20140306 of national guidance on Local Green Spaces – online here - <a href="https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation">https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation</a> states “a Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.” In the light of this guidance, the landowners of all the sites proposed for Local Green Space designation should be contacted before the neighbourhood plan is submitted for examination.</p> <p>Southwell Green seems to be the only area that is protected by both Policy Port/CR1 (as a recreational space) and Policy Port/CR2 (as a Local Green Space). Further consideration should be given to which is the most appropriate policy to protect this area.</p>	<p>Ensure all landowners are aware</p> <p>Resolve Southwell Green duplication</p>
Crown Local Agent and Bailiff	CR2	<p>One of the functions of the Portland Court Leet is to maintain and manage its tradition of safeguarding and protecting Common land from encroachment and abuse whilst embracing future change for the enjoyment of the people of Portland. For this reason, the Court Leet fully supports the proposals set out in Policy Port CR2 in relation to the areas to be designated as Local Green Spaces.</p> <p>In your letter you have referred specifically to Easton Gardens and Victoria Gardens, but I should be grateful if you would note that Weston Green and Gooseberry Field are also in the ownership of the Crown Estate. Both Weston Green and Gooseberry Field are registered Common Land (CL72 on the Dorset CC Map) and are administered by the Court Leet on behalf of the Commoners.</p> <p>There is much additional development taking place on Portland that we cannot afford to lose any of our Community Gardens or Village greens. The proposal for the designation of these areas as Local Green Spaces is a key element in maintaining the unique character of the island. The Court Leet supports the inclusion of the listed community green spaces in Policy Port CR2</p>	Note full support for policy
Community	CR2	<ul style="list-style-type: none"> <li>Being new to the area I do not know that many other areas apart from the green area by the Heights hotel overlooking Underhill and The Beach Road. It has a parking area and stone built spiral wall sculpture inset with carvings of animals. And the land area behind The Heights Hotel.</li> <li>The land area opposite the petrol station on Portland.</li> <li>Open spaces must be protected on estates and planning restricted</li> <li>Royal Manor School Tennis Courts etc should be used for local amenity and not be built on.</li> <li>I generally support the proposals in the plan (especially Southwell Green)</li> </ul>	Support
DCP Detailed	CR3	Allotments are listed in the definition of ‘Open Space, Sport and Recreation Facilities’ in the box before paragraph 6.3.9 of the local plan. Consequently, this means that local plan Policies COM4 and COM5, dealing with the retention and improvement of existing facilities and the provision of new facilities, apply to allotments.	Policy considered relevant
DCP Detailed	CR3	In the fourth line ‘manged’ should read ‘managed’.	Amend typo

Community	CR3	<ul style="list-style-type: none"> <li>• There must be further allotment space it promotes insect life etc</li> </ul>	Some support
DCP Detailed	CR4	<p>Does this policy apply to all areas of incidental open space within residential areas on Portland, or just to areas of incidental open space within the residential areas listed in paragraph 12.20?</p> <p>The policy seems to set two ‘tests’ that would need to be applied to any proposals for the loss of an area of incidental open space which are: (a) that there are ‘special circumstances’ and: (b) that the proposal had the support of the community. It is not clear what ‘special circumstances’ would justify the loss of such spaces or how community support should be assessed.</p>	Ensure it is clear which areas the policy applies to i.e. all residential areas
Community	CR4	<ul style="list-style-type: none"> <li>• Yes, I agree with Policy CR4, and would stress that as well as open space for the benefit of us humans, these areas are very important wildlife corridors (e.g. the corridor running from St George's School through Ladymead Gardens is a hedgehog through route.) Policy CR6: I welcome this: we do have a number of buildings and open spaces that could host temporary events/installations which could benefit both local people and visitors e.g. B-side and Inside Out festivals, Spirit of Portland, and contribute to vibrant communities.</li> <li>• Wholeheartedly support the policy to protect green amenity areas. Vital for the health and social growth of the community.</li> <li>• I do support a policy to protect green areas and please stop people parking on them</li> </ul>	Support
DCP Detailed	CR6	<p>The General Permitted Development Order (GPDO) allows land to be used for certain events for up to 28 days per year without the need for planning permission. Since criterion iv) would generally only permits such uses for up to one month, the policy may not be needed.</p> <p>In criterion iv) it is not clear how it would be established that a proposed event of more than one month duration would have ‘clear community and neighbour support’</p>	Re-word criteria iv)
DCP	ST1	<p>There does not appear to have been any proper assessment of the suitability of the sites identified on Map 13 for sustainable tourism uses, as there are a number of conflicts, or potential conflicts, with policies to protect and enhance the environment and other uses proposed in the neighbourhood plan.</p> <p>Many of the sites identified on Map 13 on the northern part of Portland are subject to nationally or internationally important nature conservation designations. Many of these areas also form part of, or are proposed as additions to, the Portland Quarries Nature Park. Some of these areas will also be subject to conditions attached to minerals permissions requiring the restoration of sites for nature conservation. Many of the sites lie immediately adjacent to the Jurassic Coast World Heritage Site and the sites south of Southwell adjoin a series of Scheduled Ancient Monuments. The sites south of Southwell are also all located within the Portland Bill and The Jurassic Coast Landscape Character Area (LCA5) identified in the recent Heritage and Character Study, which recognises the importance of the open and undeveloped character of this part of Portland.</p> <p>Policy Port/ST1 conflicts with numerous policies in the local plan and with national policies to protect nature conservation, heritage and the landscape. It also contradicts the more restrictive Policy/EN4, which supports the Portland Quarries Nature Park. Sustainable tourism uses may also be incompatible with other uses which may be permitted by the neighbourhood plan. For example, land at Combe Field Quarries, east of Southwell, is identified both as an area for tourism development and as a search area for wind energy (i.e. a possible location for wind turbines). This policy provides too much of a ‘blanket approach’ to promoting tourism developments in a wide range of locations on Portland. A more detailed analysis of potentially suitable locations is required, which takes account of the environmental constraints on the Island. Such an approach could potentially result in the allocation of discrete sites for specific tourism uses, which could be taken forward without harm to the environment.</p>	Decided it is better to be more strategic and include an ‘in principle’ policy with no locations specified

Minerals Authority	ST1	<p>Policy ST1 allocates land within several operational minerals sites (Admiralty, Bowers Mine, Broadcroft and Coombefield) for potential tourism development.</p> <p>Under Policy SG1 of the Minerals Strategy, Mineral reserves at Admiralty, Coombefield, Broadcroft and Bowers are safeguarded and therefore these quarries should be excluded from the areas to which this policy would apply so as to avoid potential adverse impact on ongoing quarry and mine development.</p> <p>To the extent that an amended Policy ST1 relates to minerals sites on Portland it should be amended to avoid conflict with the aims of Policy PD5 of the Minerals Strategy, which deals with the Restoration of Sites on Portland</p>	<p>Review of areas covered by or excluded from policy would be difficult to reach agreement (see specific comments) – policy therefore to be revised</p>
Community	ST1	<ul style="list-style-type: none"> <li>• There is a need on Portland for an overnight site, if you go to new ground in the summer I have counted up to 12 campervans parked there. If the site was run properly with showers toilets etc, this could bring an income to Portland.</li> <li>• One of Portland's biggest assets is its charm, all year-round people come to enjoy this by ways of Rock climbing, birdwatching, walking the Jurassic coast line etc This should be encouraged, and foot paths should be protected along with the coastal path.</li> <li>• There is mention in 8.9 of 'some major tourism developments in the planning stage' although there is then no policy associated with them. I believe you mean Jurassic. I am hugely wary of tourism developments of this scale which are likely to employ incoming skilled staff for the well-paid leadership and management roles. If it goes ahead, it is essential that Jurassic contributes to the wider Island economy e.g. through a linked round Island bus service bringing visitors to other destinations/attractions on the Island. I am also very concerned about the volume of associated visitor traffic.</li> <li>• I have reservations about the areas marked on Map 13. Are these areas identified for 'development' i.e. camping, attracting many more visitors? If so, I think the area in Kingbarrow/High Angle battery is too sensitive and highly protected to be included. Or do you mean better conservation/promotion/info on these sites for sensitive low impact visitors?</li> <li>• Perhaps there could be a possibility of connecting some of the other quarries to MEMO Underground stone hotel within a quarry?</li> <li>• Outdoor activity centre could be an option. Abseiling, paragliding centre, outdoor skills survival centre?</li> <li>• Nature walks within quarry picnic areas. Stone carving classes.</li> <li>• Mountain biking centre within the natural environment.</li> <li>• The tourist areas together with the potential new build residential areas will not leave much space left on the Island for it to breathe. Careful consideration needs to be made as to which ones to earmark in relation to the surrounding existing areas.</li> <li>• Underground hotel within a quarry, including sleeping pods? designed to blend in with the countryside...</li> <li>• Possibly in collaboration with MEMO project, seems to me like an amazing opportunity for the continuity of the project and its visitors looking for accommodation, as well as active visitors.</li> <li>• Tourism must be protected against inappropriate proposals like the beach huts</li> <li>• 13.11 I am convinced that the provision of well-organised and well-sited camp sites is key to the future expansion of sustainable tourism on Portland. Informal (wild) camping should be discouraged, as it is currently. On map 13 the suggested camping area south of Southwell (Topfields) is not suitable due to the potential for damage to the walls delineating the historic field system here. Migrant birds would also be disturbed (this area comprises the bulk of the Bird Observatory's recording area). The small area east of the Bill road could be ideal as a campsite for cyclists/walkers. All the other suggested areas on map 13 would seem to be suitable with the exception of the extreme north-eastern section around Nicodemus and the Grove Stadium, which is too environmentally sensitive as it holds nationally important species such as Early Gentian.</li> <li>• Sustainable Tourism – Need to now consider a camp site, distributive heritage centres</li> </ul>	<p>Plenty of support in principle – some concerns about specific areas</p>

		<ul style="list-style-type: none"> <li>• Paras 13.5 – 13.12 Portland is a fantastic base for sporting tourism, sailing, other watersports, climbing walking, cycling. The quarries are fantastic for off road use. We need to promote this plus wildlife tourism. The Journey is perhaps the most exciting initiative Dorset has seen for many years and it will be on Portland. The education and training possibilities are fantastic. Portland people need to get behind this and sensible policies brought forward for additional traffic using 'park and ride'; ferries(that are already there) and do everything to make this work.</li> <li>• Portland is an amazing place, absolutely unique and we need to get behind this forward looking Neighbourhood Plan. Is our MP behind this ? Weymouth and Portland tend to get forgotten and sidelined in the wider picture of Dorset. Inappropriate proposals? I think for some, anything that is new is inappropriate. I have no issue with any areas on the map. Bring on entrepreneurship and tourism...there is plenty of room for more to be created. And can we promote Portland more? Not enough Portland leaflets at the Pavilion. Not enough Portland leaflets at the container that greets passengers getting off the cruise liners. I am not entirely clear about how the Town Council Tourism Dep't promote the island? The community Partnership map/leaflet is good, more of that sort of thing. Shame that even the Olympics did not achieve more to put us on the map. My small personal agenda is promote our unique identity. My mad building of an 'Ark' summerhouse in my garden got Portland onto Channel 4 (Nov 2016) and I am now the island supplier of "Keep Portland Weird" and Portland flags. :) Anyway, keep up your good work! (Apologies for my better late than never response)</li> </ul>	
DCP	ST2	There is a Supplementary Planning Guidance (SPG) relating to beach huts on Portland (online here - <a href="https://www.dorsetforyou.gov.uk/media/160614/Supplementary-Planning-Guidance---Beach-Huts/pdf/SPG_20060731_BHuts.pdf">https://www.dorsetforyou.gov.uk/media/160614/Supplementary-Planning-Guidance---Beach-Huts/pdf/SPG_20060731_BHuts.pdf</a> ), which may be a material consideration when planning applications are determined. However, the SPG does not form part of the development plan. Rather than seeking to echo or mirror certain aspects of the SPG, a better approach might be to effectively transpose the provisions of the SPG (subject to a review of their appropriateness and effectiveness) into the neighbourhood plan to enhance their status in decision-making. Issues in the SPG not covered in Policy Port/ST2 include loft space, patio areas, the creation of curtilages etc. Consideration should be given to whether these issues, or any other issues of local concern, should also be addressed by Policy Port/ST2.	Extend criteria in policy
DCP Detailed	ST2	What is 'the appropriate colour' in criterion iii)? This implies that only one colour would be appropriate. If that is the case, then it would be helpful to say what it is in the policy.	Address matter in supporting text
DCP Detailed	ST2	13.16 The final sentence does not permit further extensions to previously extended beach huts. It may be appropriate for this 'test' of the acceptability of a proposal to form part of the policy, rather than to be outlined in the supporting text.	Add criteria to policy
Crown Local Agent and Bailiff	ST2	Whilst writing I also wish to confirm that the Court Leet is in full support of Policy Port ST2 in relation to the updating of the adherence to Planning Guidance for beach huts on the Island so as to provide clear guidelines to Hut owners.	Note support for policy
Community	ST2	<ul style="list-style-type: none"> <li>• Could this policy also include supporting the diversity of beach hut designs and styles which makes the Bill fields so interesting and individual?</li> <li>• Agree that control over building/extending and repairing beach huts should be strictly monitored.</li> <li>• There really shouldn't be any need for changes for planning applications for changes to huts (as they are just a hut). They should only be a certain size just like council allotments restrictions on sheds and greenhouses. A hut is to be dismantled and sits on the ground it does not give anyone the right to mine the ground by any amount underneath. It's not ..... Chelsea. A hut if required should be able to be removed within half a day and leave no trace of its existence</li> </ul>	General agreement

DCP Detailed	ST3	Part of the potential Cemetery Road and East Weares Heritage Trail is located within Portland Port. Whilst it is recognised that this is an aspiration, rather than a firm proposal, it should only be listed as a potential scheme if there is a realistic chance of it being implemented by 2031.	<a href="#">Reference and description revised</a>
Portland Port	ST3	Tourist Trails – the port is open to discussions about a public leisure and tourist trail through port land as long as it is totally enclosed with appropriate security fencing, does not interfere with any port operations (existing or likely future) and such security fencing and associated requirements in creating the path is funded by others broadly in the location of Cemetery land leading up towards Fancy’s Farm. Map 15 needs a key and therefore I am unable to comment and therefore would appreciate an updated version of this map and further discussion particularly in relation to the amber trail.	<a href="#">Refer to Port’s view in supporting text</a>
Community	ST3	<ul style="list-style-type: none"> <li>• To improve tourism, work is needed to improve the Merchants Railway Track from Castletown in upgrading the paths and cutting back the bramble</li> <li>• There are no details about reopening the old path from the Royal Naval Cemetery which went round the island and past the port, as it has been fenced in and bramble has also been allowed to take over</li> </ul>	<a href="#">Suggestions from the community</a>
DCP Detailed	ST4	The creation of marine berths for tourists should not be given ‘blanket support’ in a policy in the neighbourhood plan. There are numerous environmental designations in the vicinity of Osprey Quay, Castletown and Portland Port which may be affected by such proposals. Also, such proposals may have landscape / seascape implications and / or an effect on current patterns of coastal erosion. This policy needs to reflect these issues. Paragraph 8.3.2 of the local plan indicates that 17 hectares of seabed at Portland Port has consent for marine works including reclamation to create dockside operational land. Could additional or improved marine berths be created as part of, or in association with this consent? It would be helpful if the policy gave some indication of the size and scale of the ‘new and additional marine berths’ that would be acceptable under the policy.	<a href="#">Discuss potential amendments with Port</a>
Portland Port	ST4	Marine Berths for Tourists – my concern with this policy is that we invest heavily in berths that benefit tourism and business and that when this policy is read in the context of the whole document this favours tourism berths over all others. I would appreciate further discussion so as to ensure that the plan supports the development of marine infrastructure in a broader sense.	<a href="#">Have further discussions with the Port</a>