

NDDC Local Plan EIP – Issue 2

CPRE North Dorset Branch comments and **wording proposals**

Question 2.1 – Climate change

Policy 3

Comment

The government is encouraging PV installation on commercial building roofs as this can make an important contribution to carbon reduction targets and avoid deleterious effects on the countryside. UK Solar PV Strategy Part 2: Delivering a Brighter Future

Incorporate a reference to the NDDC Landscape Sensitivity Report.

Suggested amendments

- 4.16 New buildings offer opportunities to incorporate energy efficiency measures from an early stage and minimum requirements are set out through Part L (conservation of fuel and power) of the Building Regulations. **In particular, solar energy generation should be incorporated into the roofs of commercial buildings, and agricultural ones where feasible, as this can make an important contribution to carbon reduction targets and avoid deleterious effects on the countryside.** The Government has set out a timetable for the progressive tightening of building energy performance through its Zero Carbon buildings policy. The Council will rely on this mechanism which will be progressively tightened over time, to achieve improved energy efficiency in new buildings. ~~However developments should look to go further than the requirements of Building Regulations to reduce greenhouse gas emissions as much as possible.~~
- 4.21 The Council will encourage appropriate renewable or low carbon energy schemes that offer a saving in greenhouse gas emissions so that it makes its contribution towards achieving the most up-to-date targets. Whilst encouraging schemes, adverse impacts including cumulative landscape and visual impacts, will need to be satisfactorily addressed **and to take account of the Landscape Sensitivity Assessment report for N Dorset.** Some renewable or low carbon energy developments may be large scale and may require a countryside location; others may be incorporated into other development proposals. Policy 22 - Renewable and Low Carbon Energy sets out the Council's approach to development proposals for or that incorporate renewable or low carbon energy.

Policy 3 c:

- c incorporate measures to meet ~~or exceed~~ the current national targets for energy performance by incorporating measures into the building fabric itself, **particularly on commercial or agricultural buildings,** or through the

inclusion of renewable or low carbon energy measures. Where this is not practical or viable, near site or off site measures may be considered; and

...

Policy 4

Comment

AONBs have been designated as such because it is in the public interest to preserve the beauty of their landscape and countryside. As drafted this policy and explanation could be read as proposing another layer of public interest that competes with this. We would like a clear statement in Para 4.65 and in Policy 4. At present these sections are not entirely consistent.

Suggested amendments

4.65 Where development is proposed within an AONB or that may harm the setting of an AONB and is at a scale above the needs of those who live and work in the area, the Council will require developers to clearly demonstrate that the development **is in the public interest. complies with the relevant [refer to national policy].**

Policy 4

Areas of Outstanding Natural Beauty (AONB)

Within the areas designated as AONB **and their setting**, development will be managed in a way that **preserves-conserves and enhances** the natural beauty of the area. **Proposals which would harm the natural beauty of the AONBs will not be permitted delete unless it is clearly in the public interest to do so. In such instances, effective mitigation should form an integral part of the development proposals. by** ~~having regard to the objectives of the AONB management plans.~~ **Developers will be expected to demonstrate how they have had regard to the objectives of the relevant AONB management plan for the area.**

Perhaps better to refer to national policy as above?

Question 2.1 – Climate change

Policy 22

Comment

We really welcome the commitment to disclosing all information, and additional statements on agricultural land and flooding risk.

We are still concerned about Para 10.41 and Policy 22. This goes into considerable detail about possible benefits. We understand your argument, but we recall the PV array proposal for Winterbourne Stickland, in the AONB, officers recommended against, members accepted it because of what they perceived as local support - a minor donation, not legally binding, of funds to a parish council. If we'd had the money we would have taken this to judicial review. Colleagues met the Committee Chair to discuss this and I believe he accepted it was not ideal.

Perhaps you could consider an introductory phrase, however short, referring to other policy considerations?

Suzanne Keene
11 March 2015