



A RESPONSE TO THE PARNHAM PLANNING APPLICATIONS

Dorset Natural Heritage Initiative

2026





Application references:

P/FUL/2025/06865 (ED Application)
P/LBC/2025/07037 (LBC Application)

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Additional Reports

The following reports, all created in January 2026, should be read in conjunction with the submission and contain more detailed analyses on specific topics:

- **Report A – The Funding Gap**
Securing the Future Conservation of the Heritage Asset: The Funding Gap, Unreliability of assumptions, and non-compliance with HE GPA4
- **Report B – Landscape Appraisal**
Stephen Laws BA(Hons) Dip LA CMLI Chartered landscape architect
- **Report C – Heritage and Architectural Appraisal**
Kim Sankey BA(Hons) DipArch AADipCons Architect
- **Report D – Ecology and the Natural Environment Report**
- **Report E – Impact of the Planned Housing Development at Parnham on the River Brit with Specific Reference to Sewage Treatment**
- **Report F – Purported Benefits: additional comments**
- **Report G – Ridge Sustainability Statement Review**
Rich Knight, Senior Associate – Sustainability, Ridge & Partners LLP

Introduction

This response to the above Applications is submitted by Dorset Natural Heritage Initiative (DNHI).

DNHI wishes to register its objection to the Enabling Development (ED) Application and urges Dorset Council (DC) to refuse grant of planning permission for the ED Application.

This submission aims to consider the ED Application, and also the Listed Building Consent (LBC) Application, in the context of para 221 of the National Planning Policy Framework (NPPC) that, in order to approve any application for enabling development that conflicts with policy, a local planning authority should be satisfied that such proposals should secure the future conservation of a heritage asset and the associated benefits should outweigh the disadvantages.

The submission also considers the tests in Historic England's (HE) Good Practice Advice in Planning Note 4 (HE GPA 4).

Summary Statement of Key Issues

1. The Council is being asked to approve a major development in the Dorset National Landscape (DNL) that will give rise to major adverse impacts on the character and setting of the National Landscape (NL), the Registered Park and Garden (RPG), Parnham House itself, and the Beaminster Conservation Area (BCA).
2. These impacts result directly from the development and cannot be mitigated – the Applicant acknowledges this. The responses from DNL and the Council's Landscape Officer are unequivocal as to the scale of these disbenefits and that any benefits from the development will not outweigh those disbenefits.
3. The Council has statutory duties under s245 of the Levelling Up and Regeneration Act 2023, which require it to further the statutory purpose of the Dorset National Landscape to conserve, protect and enhance it. These duties take precedence over planning policy. Granting planning permission in this case would be contrary to those duties and would be susceptible to legal challenge.
4. Para 189 NPPF also accords National Landscapes “the highest status of protection” in relation to the issues of conserving and enhancing landscape and scenic beauty. Scale and extent of development in a National Landscape should be sensitively located and designed to avoid or minimise adverse impacts. This development does not meet that test and cannot possibly do so. It does not meet the tests in para 190 NPPF of exceptional circumstances.
5. The development also involves the destruction of ecological habitat including Priority Habitats. The construction and future operation of the development will destroy and introduce ongoing disturbance to the habitat and species, including those with high levels of protection.
6. The Applicant does not deny the scale of these impacts. The Applicant tends to downplay them and DNHI disagrees with the assessments submitted by the Applicant and has significant concerns about the approach to assessment.
7. The Applicant acknowledges (Planning Supporting Statement) that the proposed works to Parnham House (in the LBC Application) are not of themselves sufficient to outweigh the disbenefits (para 221 NPPF). The Applicant relies on other claimed but strongly disputed benefits – such as construction activity, ecological improvements and biodiversity net gain, provision of new homes and future spending – to tip the balance in favour of the development.

8. It is doubtful whether such purported benefits can ever outweigh the disbenefits having regard to the statutory and policy framework outlined above. In any case, they are generally overstated, or are not benefits at all: for example, construction activity is only a temporary benefit and not a reason to grant planning permission; new luxury and high value homes in a gated development with nil affordable or lower cost housing provision do not meet any identified housing need; sustainability credentials cited that are predicated on environmentally unsustainable development; ecological enhancements that do not require development in order to be carried out; estimates of future spending and trickle down effects which are notoriously hard to evaluate and not capable of being secured by planning conditions; future benefits arising from a “hospitality offering” that is not explained or defined and whose viability is not established.
9. In fact, several of these give rise to actual disbenefits, such as nil affordable housing, destruction of ecology, and the Applicant’s aspiration not to pay Community Infrastructure Levy (CIL).
10. As to the proposed conservation works to Parnham House, it is a material consideration that the primary purpose of the enabling development is to create a private home, with an undefined “hospitality offering”. There should be doubt whether enabling development is appropriate for those purposes; or that it represents the “optimum viable use”. Moreover, the Applicant has not satisfied key tests of Historic England’s Guidance Note 4. It has not established that the enabling development is the minimum amount necessary, nor that it has exhausted all other reasonable efforts, nor evidenced that enabling development is the last resort.
11. The proposals are simply the Applicant’s preferred scheme, which it has then endeavoured to shoe horn into relevant planning policy.
12. It is also highly doubtful that the proposals will “secure the future conservation of a heritage asset” (para 221 NPPF). There is a substantial funding gap of £14.9m between the cost of the works included in the LBC Application (£32.7m) and estimated proceeds from the ED (£17.8m). This means that the Applicant must find that £14.9m, and a further £15m for the additional hospitality units that are apparently necessary to provide revenue for future maintenance. All of these estimates are susceptible to reasonably foreseeable adverse sensitivity impacts which could reduce actual proceeds available to carry out works to Parnham House.
13. Why does this matter? Put simply, the future conservation of Parnham House via the scheme proposed by the Applicant is not by any stretch of the imagination “secured” by enabling development. If the Applicant (or future owner) cannot find the additional funds required, it cannot complete the conservation scheme and there will never have been a justification for enabling development.
14. It is also material that the Applicant has proposed it completes the enabling development before carrying out any works to Parnham House. If it fails to find the necessary funds, the disbenefits would arise without any of the purported benefits.
15. This is a material and real risk but it is a wholly unnecessary risk. It flows directly from the scale and ambition of the Applicant’s proposals. It is not the only solution. It is the Applicant’s preferred one and it represents speculative redevelopment.

16. This is not what enabling development policies are intended to facilitate. The protected landscape is too important; the disbenefits too grave. The enabling development application should be refused.
17. At the heart of the proposed development is a fundamental contradiction: that to deliver certain purported benefits, huge disbenefits must occur. That is not sustainable. It is not sensible. It is not supported by statute or policy.
18. Whilst the financial position of an applicant is not normally a planning matter, it is fundamental in the case of enabling development.
19. The risk that the scheme in the LBC Application is not delivered is not theoretical; neither is the risk that the future operation of the House as a hospitality business is not viable. It is plainly apparent. The Business Plan is vague and lacks material detail necessary to interpret whether it is realistic.
20. The Application's assessment of the disbenefits is disputed. In many cases, the obvious disbenefits are not considered at all, or are glossed over.
21. The location of the ED is among the most publicly visible parts of Parnham Park, both from footpaths crossing the Park and those in the wider area. The Applicant's own assessment accepts that long term residual landscape effects would be substantial and that mitigation cannot remove the fundamental change in character. This includes the impacts on the footpaths through the Millground.
22. The ecological value of Parnham Park lies in its continuity and connectivity over centuries. Development of this scale would fragment established habitats, disrupt ecological corridors, and affect protected and priority species.
23. Granting permission for this scheme will set a harmful and unsupportable precedent for inappropriate major development within the most sensitive and significant landscapes in the DNL area.
24. HE GPA 4 is clear: the fact that proposals for the conservation of a heritage asset may be considered favourably does not mean by itself that associated enabling development should be approved, where disbenefits cannot be outweighed. If the Council is not satisfied now that the future conservation of the heritage asset is secured and that benefits outweigh harm, permission must be refused.
25. Reliance on conditions or planning obligations is unsafe in this case, where the availability of funds to deliver the heritage benefits is in doubt, meaning that whatever conditions or planning obligations are imposed, a lack of funds will mean that the "benefits" may well never materialise.
26. DNHI submits that the Council should conclude that the statutory and policy tests for enabling development are not met, that the future conservation of Parnham House is not secured, that the harm to landscape, ecology and heritage is certain and irreversible, and that the asserted benefits are uncertain and unsecured.

Dorset Natural Heritage Initiative Submission

This submission is divided into the following sections:

1. The Fundamental Contradiction

Examines the fundamental contradiction in these proposals, which seek to conserve while also destroying what is of value.

2. Securing the future of the heritage asset

Reviews the inherent risks to delivery of the proposals as a result of a significant funding gap, and material deficiencies in other supporting financial information.

3. Disbenefits

Examines the disbenefits resulting from the proposals:

3.1 Landscape and visual effects: the Applicant's assessment is deficient in several material respects. **Report B** is a Landscape Appraisal by Stephen Laws commissioned by DNHI.

3.2 Heritage and Architectural Matters: examines the assessment of heritage impacts and architectural issues. **Report C** is a Heritage and Architectural Appraisal by Angel Architecture for DNHI.

3.3 Ecology: considers impacts on ecology as disbenefits, reviews the approach to assessment of ecological impacts by the Applicant and highlights deficiencies in that approach.

3.4 Sewage and flooding: presents concerns about the current declined state of the River Brit and potential impacts on this feature, and the village of Netherbury, from sewage spills.

4. The Purported Benefits

Examines the benefits asserted by the Applicant, how these are not genuine benefits, and how these benefits (such as they are) do not outweigh the disbenefits.

5. Section 106 Agreement

Provides commentary on the draft section 106 heads of terms and the associated issues with certainty of delivery.

A Response to the Parnham Planning Applications

1 The Fundamental Contradiction

- 1.1 The Applicants have made much of the fact that their “creative reimagination” of Parnham House guarantees its future preservation and delivers economic, ecological and other benefits. This scheme is based, primarily, on the creation of a private house, with some form of “hospitality offering”. The house will not be open to the public. Access to the park will be only on paid entry. There are serious questions as to whether this scheme meets any public benefit test.
- 1.2 At its heart, this scheme relies on a fundamental and irreconcilable contradiction: in order to attempt to “reimagine” what remains of the destroyed Parnham House for its own private purposes, the Applicant will sacrifice the landscape and wildlife and history of the place of which it is only a part. As a result, all those elements which contribute immeasurably to the building’s heritage and cultural value, must be harmed, permanently and irreversibly.
- 1.3 The value and importance of the landscape and its ecology persist notwithstanding the condition of Parnham House, and the cultural and heritage value of Parnham House relies on and is inextricably linked to the Park and wider landscape within which it sits.
- 1.4 It is an extraordinary proposition to damage one for the sake of the other; in doing so, both are permanently and irreversibly damaged.
- 1.5 Put simply, to grant this scheme planning permission would place the asserted (but unproven) needs of one destroyed building and its owner above the needs of the wider protected landscape, its cultural heritage, ecology, amenity and the interests of the community.
- 1.6 We note the comments made by the Council in its pre-application response of 24 December 2024 that, “Given the fundamental concerns with the extent of the enabling development, we encourage you to also explore alternative options and funding sources which would still deliver significant heritage benefits, but with reduced harm”.
- 1.7 The Applicant has apparently not done so. It has also not demonstrated that ED is justified because “*other reasonable efforts have failed*” (*HE’s Advice Note in Planning Note 4* (HE

GPA4) para 14). The Application does not contain any details of what other efforts the Applicant has attempted.

- 1.8 In so doing, the Applicant has not demonstrated that the ED is “the minimum amount necessary” (HE GPA4 para 14) or that it is the “last resort” (HE GPA 4 para 13).
- 1.9 DNHI also questions whether this scheme is necessary at all. It is only the Applicant’s preferred scheme, based on a commercial proposition. It is no more necessary to “creatively reimagine” the ruins of Parnham House than it would be to “reimagine” Tintern Abbey or Corfe Castle in order to secure their future conservation.
- 1.10 Accordingly, the ED Application seeks to construct a justification for a hugely ambitious and complex scheme (but not fully fund the related works to the House) around a narrative that it will be of benefit to the whole community. As a private home primarily, with limited if any public access, it will only benefit the Applicant.
- 1.11 Significantly, this emphasis on remote and ill-defined benefits ignores or underplays the harms and disbenefits and ignores that the benefits are primarily private, not public.
- 1.12 It is a material consideration that the ED will not fully fund the Parnham House works. The Council should have regard to the possibility that, in the scheme as proposed, the disbenefits of the ED may arise without any of the benefits materialising.
- 1.13 Ultimately, the ED Application and related LBC Application are only the latest in a series of schemes promoted by the Applicant. There is little reason to think that the ED Application will be the final one. The Applicant has not delivered the apparently essential hospitality units under extant planning permissions.
- 1.14 It is material that other planning policy and statutory requirements apply to the consideration of the ED Application, including those relating to the preservation and conservation of the National Landscape.

2 Securing the future conservation of the heritage asset and the Funding Gap

- 2.1 Detailed comments on the financial matters relating to the ED are set out in **Report C**.
- 2.2 In considering whether the ED will “secure the future conservation of the heritage asset”, the Council should have considerable regard to the fact that there is a significant funding gap between the assumed proceeds of the ED and the total cost of the works the Applicant proposes for Parnham House in the LBC Application (the Parnham House works).
- 2.3 The Parnham House works are estimated at £32.7m. The ED is assumed to contribute £17.8m. This means that the Applicant must source £14.9m above and beyond the assumed ED proceeds. How this funding gap is to be closed is not explained.

- 2.4 In addition, the Applicant must source a further £15m for various hospitality units it proposes for a business to provide revenue to fund future maintenance of the heritage asset. The ED cannot, of course, be used for this purpose.
- 2.5 In total, on the Applicant's own figures, the Applicant must source £29.9m above the ED proceeds. This presents a clear risk to delivery of the Parnham House works and the Applicant's hospitality business.
- 2.6 In addition, the ED proceeds are susceptible to reasonably foreseeable adverse impacts that would reduce the funds available, including higher construction and, higher funding costs, and lower sales prices.
- 2.7 Further, under the provisions of the draft s106 Heads of Terms (S106 HoTs), the Applicant proposes in the S106 HoTs that it can draw down accrued prior costs for conservation from the sums deposited in the escrow. This would further reduce the available funds for completion of the Parnham House works and would, of course, be a matter for negotiation with the Council if only a part of the Parnham House works could be completed.
- 2.8 The Business Plan for the hospitality offering is vague and has a number of material omissions and deficiencies: it is not coherent. It may therefore be assumed that if this ill-defined plan does not come to fruition, the future maintenance of the heritage asset will be at risk.
- 2.9 All this raises the question whether the ED can be said to secure the future conservation of the House.
- 2.10 Overall, this is a hugely ambitious and costly scheme, one which has few if any parallels in the UK, certainly not one undertaken by a private individual. The scale of the ambition for Parnham House is the scheme's Achilles Heel.

3 Disbenefits

There are a number of disbenefits associated with the ED. Primarily, these relate to landscape and visual impacts, impacts on the registered park and garden and the setting of Parnham House, and ecology.

Other potential disbenefits relate to flooding and foul water treatment and transport. These are dealt with in Ecology section d. Sewage and Flooding

3.1 Landscape and Visual Impact

- 3.1.1 The ED Application proposes major development in a landscape which enjoys the highest level of protection for its landscape and scenic beauty and which will impact on its "special qualities" (as defined in the National Parks and Access to the Countryside Act 1949 and the Countryside and Rights of Way Act 2000).

3.1.2 The Council will be aware of the policy and legal protections and considerations that apply to landscape issues. They are also set out comprehensively in the response of Natural England (NE) of 24 December 2025.

3.1.3 It is also noted that Dorset National Landscape has recommended refusal of the ED Application (27 January 2026) on the basis that: *“this application would be deemed to fail to comply with the primary purpose of the NL designation, this being the conservation and enhancement of natural beauty”*.

3.1.4 It is also worth emphasising again the high value and importance of the protected landscape and its environment to local people and visitors, and the significant amenity and economic value of this asset.

3.1.5 The Application includes a landscape and visual impact assessment with the environmental statement (ES). DNHI identified several areas of concern in that assessment and commissioned an independent Landscape Appraisal – provided at **Report D** with this submission.

3.1.6 In summary, the Appraisal concludes (*inter alia*) that:

- 3.1.6.1 The high sensitivity of the NL and the RPG, reflecting their designations and the value of the local landscape for its contribution to the setting of the heritage asset, the BCA and the inherent beauty of the Brit Valley landscape.
- 3.1.6.2 The high amenity value of footpaths and long distance paths, and cultural connections including to Thomas Hardy.
- 3.1.6.3 The ED site forms part of the landscape character of the BCA and fulfils this function regardless of intervisibility between the designated areas and the BCA Appraisal’s emphasis on perpetuating recommends the landscape setting and trees to the conservation area.
- 3.1.6.4 The ES, whilst it concludes that the long term residual landscape effects on the RPG would be substantial, does not assess the effects of the ED on the wider local setting of the River Brit valley or the setting of the heritage asset. However, it recognises that there would be changes in land use, landscape/settlement pattern and loss of existing landscape features and a change in views, which would significantly alter the visual character of the landscape.
- 3.1.6.5 Effects on setting will occur due to a change in the local context as perceived in the local landscape relating to changes in key features including the landscape of Parnham Park, the landscape character of the River Brit valley between Beaminster and Parnham House, the setting of Parnham House, Park and the RPG and the setting of Parnham Park and the RPG and; the setting of BCA.
- 3.1.6.6 Almost every local public footpath with potential views of the ED will be significantly adversely affected due to the change in view and the length of

path affected. Significant adverse visual effects from public footpaths will result.

- 3.1.6.7 Potential changes in the local landscape are highly visible, especially for six months of the year. These changed views will alter the perceived visual character of the local landscape to the detriment of local amenity and the appreciation of the natural beauty of the National Landscape.
- 3.1.6.8 The Park is the most visible part of Parnham and clearly visible from long distance footpaths and others for most of the year. Even minor views from these footpaths create significant adverse impacts when development in open countryside takes place and has the effect of creating a notable perceived shift in the settlement edge of Beaminster. This in turn alters the landscape context (setting) of the BCA and the heritage assets at Parnham.
- 3.1.6.9 All the above elevate the value sensitivity and adverse effects on this local landscape above that which would occur in other parts of the NL area.
- 3.1.6.10 The ED conflicts with local policies ENV1, EVN3, ENV4, ENV10, EVN12 and ENV15 and paras 189, 190, 208 and 221 of the NPPF.
- 3.1.6.11 The benefits of the ED proposals do not outweigh the disbenefits insofar as they relate to landscape and visual effects. These disbenefits occur despite the mitigation measures incorporated into the design proposals.

3.2 Heritage and Architectural Matters

The LBC Application includes a Heritage Statement. DNHI identified several areas of concern in that assessment and commissioned an independent appraisal by Angel Architecture, provided with this submission – provided at **Report C**.

In summary, the Appraisal:

- 3.2.1 Examines the heritage and architectural aspects of the ED Application and LBC Application, setting out the policies which apply to the Applicant's proposals against which these must be tested and assessed.
- 3.2.2 It describes the significance and context of the BCA and its setting; the RPG and its setting and the context of Parnham House and other heritage assets on the site.
- 3.2.3 In sections 2.0, 3.0 and 4.0 it carries out an analysis of context, which is vital to considering potential impacts (NPPF Para 214) and weighing in the balance public benefits against harm. This recognises that the partial and potential conservation of Parnham House must not only be assessed in relation to other non heritage harms (failure to deliver for local housing need; ecological impact; burden to over-stressed existing infrastructure and amenities) but also in terms of the failure to preserve and enhance BCA and the substantial harm to the Grade II* RP&G which forms part of its setting.

- 3.2.4 It quantifies the impacts on the proposed 82 houses and 2 visitor accommodation lodges on BCA and deals with elements relating to the “creative reimaging” of Parnham House itself.
- 3.2.5 A review of the drawings and documents is provided, and finds them to be lacking in detail, inaccurate, inconsistent and devoid of any reference to local distinctiveness as required by Local Plan (LP) policies, national Future Homes Standards and the official Homes England design toolkit.
- 3.2.6 The considerable lack of adherence to, and cumulative negative impacts from noncompliance with, Local Plan Policies ENV1, ENV2, ENV3, ENV4, ENV5, ENV10, ENV12, ENV15 and ENV16 and Historic England’s Conservation Principles is also demonstrated.
- 3.2.7 The proposed development fails to respect the existing landscape settings of Parnham House, BCA and promotes an alien and suburban response to the context, not only of the RP&G, but the Brit Valley. It would result in adversely impacting fine views, the cherished local scene, and the tranquillity of the undeveloped character of the green space.
- 3.2.8 The proposed ED (as required by NPPF Para 221) does not deliver any benefits, “which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, [and] outweigh the disbenefits of departing those policies”. The ‘restoration’ is unclear and of dubious merit and unlikely to serve the purpose of saving the heritage asset while delivering any public benefit.
- 3.2.9 The proposed enabling development is not a sensitive response to the area, the RP&G or Parnham House; it is not sustainable; it does not attempt to appreciate locally distinctive references and materials and promotes an incongruous typology.
- 3.2.10 The proposals lack any sensitivity to the context, especially the proximity to Millground Cottages and meadow through which a public footpath has existed since at least 1809. The introduction of new development on both sides of the river Brit would be hugely disruptive of the riparian habitat. DC has specific planning policies to protect the natural environment, clearly stating that: *“Development should protect and enhance the natural environment – its landscape, seascapes and geological conservation interests, its wildlife and habitats and important local green spaces – by directing development away from sensitive areas that cannot accommodate change”*.
- 3.2.11 The Ecological Impact Appraisal (EiA) accepts that the ED will be ecologically harmful but is silent on the scale and nature of this disbenefit. The potential for negative impacts on ecology are also set out in the responses from Natural England, Dorset Wildlife Trust (DWT) and Dorset Council Natural Environment Team (DC NET).
- 3.2.12 The Applicant’s approach seems to be that there is no disbenefit because it will carry out ecological improvements elsewhere. This is not the correct approach to assessing impacts on ecology. NE (response 24 December 2025) raises doubts as to whether the improvements proposed will adequately mitigate impacts on ecology

or are even deliverable. DWT and DC NET have also raised concerns with the Council in their objections.

3.3 Ecology

- 3.3.1 The ED Application includes an Ecological Impact Assessment (EcIA). DNHI has identified several areas of concern both in the scope of the assessment and its approach to assessing impacts and a separate report on Ecology (**Report D**) is provided with this submission.
- 3.3.2 DC has specific planning policies to protect the natural environment, clearly stating that: "Development should protect and enhance the natural environment - its landscape, seascapes and geological conservation interests, its wildlife and habitats and important local green spaces - by directing development away from sensitive areas that cannot accommodate change".
 - 3.3.2.1 The Ecological Impact Appraisal (EcIA) accepts that the ED will be ecologically harmful but is silent on the scale and nature of this disbenefit. The potential for negative impacts on ecology are also set out in the responses from NE, DW.
 - 3.3.2.2 The Applicant's approach seems to be that there is no disbenefit because it will carry out ecological improvements elsewhere. This is not the correct approach to assessing impacts on ecology. NE (response 24 December 2025) raises doubts as to whether the improvements proposed will adequately mitigate impacts on ecology or are even deliverable. DWT has also raised concerns with the Council [ref].
- 3.3.3 Detailed commentary is included at **Report D**.

In summary, DNHI's observations are as follows:

- 3.3.3.1 The Applicant chose to scope out impacts on ecology from the EIA and no scoping request was submitted to the Council, nor did the Applicant consult with DCNET (or presumably NE. NE, DWT and DC NET have all expressed substantial concerns about the ED Application and approach to assessment.
- 3.3.3.2 The ED will result in the permanent and irreversible destruction and loss of ecological habitats (including protected priority habitat). Their high ecological value comes in part from longevity and are highly sensitive to change. This is not compliant with local and national planning policy. Fragmentation within and outside of the Park will certainly cause a corresponding loss of biodiversity.
- 3.3.3.3 The ED will put notable and protected species and habitats at risk, and will introduce noise and light pollution to an area currently tranquil, quiet, and dark at night, as well as increased human activity (including more pets), increasing risks of disturbance.

3.3.3.4 The baseline relies on out of date surveys, including a 2003 report (not provided), and species surveys from 2022/23 only verified on 3 separate one-day site visits in 2025. Key species absent include otters, kingfishers, barn owls, water voles and watershrew, and hedgehogs, all seen regularly in this area. The baseline does not include assessment of established ecological networks, or any assessment of lichen species within the ED redline.

3.3.3.5 The approach to assessment of impacts is unsound:

- 3.3.3.5.1 Key elements of design are not referenced e.g. the 30m bridge over the River Brit. There is no engineering detail to inform adequate assessment of a) impacts from its construction (eg disturbance) or b) operation. The only reference to impacts from this bridge are to shading, although the extent and nature of this is not specified, or the significance of the impact.
- 3.3.3.5.2 There is no description of construction activities such as excavation, earth moving, piling, material stockpiling, phasing; periods of likely disturbance; plant and machinery use (noise, vibration, air quality impacts) and the presence of operatives in sensitive habitats.
- 3.3.3.5.3 The reliance on a construction environment management plan (CEMP) can only be established as appropriate if it reflects actual assessed activities by reference to identified receptors. As above this information is omitted.
- 3.3.3.5.4 There is no information or description of the nature of the future operation of development and the potential impacts on ecological receptors from factors such as noise and lighting from residential units, increased human activity in the area, and pets and the realignment of the Millground footpath closer to the River Brit.
- 3.3.3.5.5 Photographic material on the Applicant's own website suggests extensive tree clearance along the Millground section of the River Brit. This is not assessed.
- 3.3.3.5.6 The reliance on Biodiversity Net Gain (BNG) as mitigation presents significant issues. It is doubtful that BNG/other improvements will compensate for the irreversible and permanent harm resulting in loss of habitat (including priority habitat) to the ED. See NE's response. It cannot be considered by itself to mitigate all potential impacts from the ED and its operation, and the irreversible harm that will be caused by the ED far outweighs any gains from BNG;
- 3.3.3.5.7 Environmental stewardship / improvements do not depend on planning applications for delivery.

3.3.3.5.8 Overall these are substantial and significant disbenefits that are not compliant with relevant policy and law and are not outweighed by the purported benefits.

3.3.4 Detailed comments on ecology matters are provided in **Report D** on Ecology.

3.4 Sewage and flooding

3.4.1 The ED Application includes a Flood Risk Assessment and drainage information. DNHI, based on long experience of local residents, has concerns about the potential impacts of the ED on water quality in the River Brit, flood risk, and the potential of a future connection to the constrained local sewage network. These are set out in detail in the Flooding and Sewage Report provided with this submission.

3.4.2 Detailed commentary is included at **Report E**.

In summary:

3.4.2.1 The current state of the upper River Brit is that it is in decline, suffers from regular sewage discharges, and regularly floods into Netherbury, bringing sewage into the streets.

3.4.2.2 The potential adverse impacts on neighbouring residents from sewage overflow/discharge is of particular concern given regular incidences of sewage discharge in the River Brit, exacerbated by regular flooding of the river.

3.4.2.3 The plans for sewage treatment are incomplete and muddled, as different plans show different layouts. If the expectation is that detailed design is left to pre-commencement conditions, there need to be explicit parameters. However, given the potential environmental risks, these details should be specified now, even if these facilities require an environmental permit.

3.4.2.4 There is no justification presented for the use of Packaged Treatment Plants (PTPs) in the ED Application when the site is close to a main sewer and, under the Council's own guidance, the use of PTPs should not be permitted in this location. The location of sewage treatment tanks with a combined capacity of 157,000 litres, semi-submerged by groundwater for most of the year, within a few metres of a river which even the applicant's own modelling recognises is subject to a risk of flooding, seems to present clear and major risks of a pollution incident occurring.

3.4.2.5 The siting of the PTPs close to the river and below ground makes them more likely to be impacted by floods and high ground water levels, leading to a greater risk of failure and of raw sewage being run into the river, and is contrary to guidance.

- 3.4.2.6 The ED Application does not include details of any back up facility to address breakdowns, blockages, or even planned preventative maintenance and how those costs would be met. It does not specify any replacement strategy for the PTPs although inevitably they will have a shorter lifespan than the development itself.
- 3.4.2.7 If the Council or Environment Agency (EA) rejects the PTPs as proposed and the ED is required to connect to the main sewer, this will raise significant issues unless capacity and upgrades to the pipework are implemented. The main sewer (in the words of Wessex Water) already suffers from “hydraulic incapacity” and “ongoing vulnerability [to bursts], despite previous interventions”.
- 3.4.2.8 The ED Application does not include details of how sewage from Parnham House and events run there will be managed, if not within existing facilities (unspecified). The creation of a hospitality business in Parnham House and the ancillary hospitality accommodation can reasonably be expected to generate additional volumes of foul water.
- 3.4.2.9 The consequences of any unforeseen or accidental discharge of the sewage from more than 80 houses and the ancillary hospitality accommodation in this location would be catastrophic and it could affect the whole of the River Brit running from Beaminster south to the sea at West Bay.
- 3.4.2.10 It is curious that the consultants who compiled the report on groundwater had no further input after it was submitted - not even regarding further, automated, groundwater level measurements that were due to continue for several months after the report was submitted. The report also noted the existence of made ground underlying the site representing a potential source of contamination that could affect groundwater quality and the proposed development which they had found in the cores excavated for their boreholes. Their recommendation that this required further investigation was not adopted. Instead a three year old report from another company was revised with barely any mention of the made ground which their own excavations with mechanical diggers had failed to reveal.

3.5 Transport

DNHI has reviewed the Transport assessment provided with the Application documents. DNHI has not commissioned expert analysis of this material but several important issues with the assessment are clear:

- 3.5.1 Traffic counts were undertaken in March 2021, over three and a half years before the Application was submitted. Even if this is justifiable (typically surveys of this age would be considered out of date), the survey period was during COVID and there should be reasonable doubts as to whether the data accurately reflects normal traffic volumes.

- 3.5.2 The Transport assessment does not appear to address cumulative impacts with large events of the type the Applicant has publicised.
- 3.5.3 The arrangement of the access and visibility splays appears to be deficient and designed in a way that risks accidents.
- 3.5.4 The comments of the Council's highway officer are also noted.

4 The Purported Benefits

- 4.1 By the Applicant's own admission (Planning Supporting Statement 6.99):

“the public benefit of restoring Parnham House does not by itself decisively outweigh the adverse impacts of enabling development of the listed building, historic park and the surrounding landscape”.

- 4.2 This means that the Council must consider that the other benefits asserted by the Applicant are of sufficient clarity and certainty that they tip the balance in favour of granting planning permission, having regard to para 221 NPPF.
- 4.3 In any case, the other benefits asserted by the Applicant as flowing from the proposals are not convincing and should be given limited weight, if any. To the extent any such benefits exist, they do not tip the balance to outweigh the disbenefits.
- 4.4 Comments on the purported benefits are set out below. Of particular note:
 - 4.4.1 The claims of the “restored” House being a cultural and educational resource, with public access, is not supported by any detail in the Application. For example, the S106 HoTs refer to a public access scheme but there is no draft scheme provided within the Application Documents. These benefits are intangible and should be given no weight.
 - 4.4.2 Any potential economic benefits related to construction works will be temporary and should be given limited weight. Construction work also gives rise to disbenefits. Furthermore a potential benefit from construction work is not a reason to carry out development.
 - 4.4.3 The environmental sustainability credentials of the ED are overstated:
 - 4.4.3.1 Key information is missing including on PV arrangements and other factors which would influence the layout, orientation and massing of development.
 - 4.4.3.2 The preferred use of sub ground sewage treatment and storage tanks does not appear to have considered the ecological and environmental risks related to spills and leakage resulting from mechanical or other operational failure, or poor maintenance.

- 4.4.3.3 The destruction and loss of ecological habitats (including priority habitat) – permanent and irreversible – through development is a clear disbenefit that cannot be outweighed; it is certainly not environmentally sustainable.
- 4.4.3.4 BNG is not a benefit; it is a statutory framework to ensure that the irreparable loss of habitat from development is off-set, with improvements. Provision of BNG off site (which is considered) will not directly benefit the development site or its surroundings.
- 4.4.3.5 Delivery of the enhancements that the Applicants are keen to provide for the whole of Parnham Park and the Millground do not require an application for planning permission. In fact, the Applicant has allowed the appearance and environment of the Millground to deteriorate. Damaged fences and gates have not been replaced. There has been no sustainable land management.
- 4.4.4 The residential units in the ED do not meet an identified housing need. Simply providing houses does not meet a need; certainly not an exclusive gated community of only expensive houses (£600,000–£2 million per unit) well in excess of average house prices for the area. There is no affordable housing provision. There is no viability appraisal in the Application Documents to justify this.
- 4.4.5 There is a significant amount of uncertainty as to what exactly the future “hospitality” offering will be. It is ill-defined other than being a “private house with hospitality offering”, and will be gradually introduced (without reference to any timeframe). The Business Plan is deficient. There is no detail on the nature of operation, occupancy, or revenues. There is no detail on future cash flows, risks or contingencies. It is highly conjectural. This undermines the credibility of the claims that the hospitality offering will deliver economic benefits; and also makes it impossible to quantify what those benefits might be. It is not possible to establish that any of the assumed jobs will directly benefit Beaminster and its environs.
- 4.4.6 In any case, the economic benefits appraisal lumps in benefits from the additional hospitality units, which are not related to the ED Application / Conservation Works Scheme, and which are not dependent on their delivery. This is a misleading assessment.

5 Section 106 Agreement

- 5.1 Para 68 of HE GPA4, that “*in order to avoid enabling development being carried out without the heritage benefits (including long-term maintenance arrangements) being achieved, the decision maker should put in place a legally enforceable mechanism under which the relevant funding and works will be carried out*”.
- 5.2 There is limited value in commenting in detail on the draft S106 heads of terms (S106 HoTs); a local planning authority, acting reasonably, would not be expected to grant planning permission on the basis of such heads of terms.

5.3 However, some key weaknesses are evident (set out below and not exhaustive), which suggest a lack of concern by the Applicant about how delivery of the scheme will be secured. Seen together with the Funding Gap, this should raise concerns about the commitment to deliver the whole scheme:

5.3.1 Although para 67 HE GPA 4 acknowledges that works to the heritage asset may be dependent on funds only available at a late stage of the development, the S106 HoTs as drafted would allow completion of the residential units in the ED and sale of a proportion thereof before any sums are deposited in an escrow and/or any of the Parnham House works are even started.

5.3.2 Para 67 HE GPA 4 is explicit that there should be a delivery plan for works: "*Benefits should preferably be secured as early as possible within the time period of the development prior to completion or occupation* (para 67) – not at the end. There is no delivery plan included in the Applications.

5.3.3 Allowing determination of the "Restoration Sum" to be made only prior to deposit funds in the escrow creates the risk of dispute at that stage over what sum must be deposited into the escrow.

5.3.4 The ability of the Owner to withdraw unspecified sums from the escrow prior to carrying out any of the Restoration works, or unrelated to delivery of those works, simply reduces the available sums for carrying them out. It opens the door to the Owner simply being compensated for accrued costs, without any risk of completing the whole scheme.

5.3.5 An inherent risk in using s106 agreements for delivery of projects that are dependent on additional funding (such as here) is that if the necessary funds – beyond the ED proceeds actually received – do not materialise, a Court is not likely to grant specific performance. Phasing the ED works relative to progress on the Restoration works may provide some control through the use of an injunction to stop works. It will not provide any remedy to ensure the completion of any works.

5.3.6 Moreover, granting planning permission for the ED in such a way is inherently and materially risky unless there are clear references to a) a scope of works and b) a sum.

5.3.7 There is no phasing / obligation relating to the delivery of the associated hospitality units, which are apparently essential to provide future income for maintenance. Given that the Applicant relies heavily on these units to justify its economic benefits appraisal, non-delivery would undermine those claims. Significant funds need to be found to deliver this element.

5.3.8 Given the importance attached by the Applicant to delivery of the other hospitality units in the Park vis future revenue and therefore maintenance of the heritage asset, a section 106 obligation should include obligations for delivery of these units via negative obligations preventing occupation of the ED until at the very least binding contracts for construction of these units are completed. The ED should not be allowed to proceed at risk.

- 5.3.9 If the Council is satisfied that the provisions of the HMMP are satisfactory (or as amended), a delivery plan and funding commitments should be set out in a section 106 agreement, and adequate controls placed on progress of the ED relative to those obligations.
- 5.3.10 While such controls would be absolutely necessary to ensure delivery of the (purported) benefits in full, a developer would typically resist such controls on viability grounds, which highlights the challenges facing the Council in satisfactorily controlling the development through a planning obligation or conditions.
- 5.4 DNHI's view, on the basis of legal advice from experienced planning lawyers, is that the Council will face significant challenges to draft a s106 agreement that is sufficiently robust to address the risk of non-completion of any aspect of the proposals due to lack of finance/developer default. This is a function of the overall scale and cost of the Parnham House works.
- 5.5 It is also relevant and important to consider that a planning permission binds the land, not an applicant. Any s106 agreement must be drafted with this in mind, not on the basis of assertions from an applicant.

6 Conclusions

- 6.1 DNHI does not oppose the principle of works to Parnham House. It objects to the scale of the proposals, the impacts that result from them on a cherished and protected landscape, for private gain.
- 6.2 However, the ED appears to have been designed to maximise development revenues to generate funding for the Applicant's preferred scheme of works. Para 14 HE GPA4 is clear:

"The sums of money generated through enabling development are provided solely to directly solve the conservation needs of the place, not to solve the financial needs of the present owner, [or] to support / finance a business".
- 6.3 It is not the case that establishing a conservation deficit is enough by itself to justify enabling development; neither is it the case that asserting benefits – such as they are – is enough to gloss over the disbenefits.
- 6.4 The conservation deficit arises because of the ambition to rebuild Parnham House. A less ambitious scheme would not result in such a large conservation deficit, a claimed need for such an intrusive and damaging enabling development, and the concomitant adverse substantial disbenefits.
- 6.5 The ED Application and LBC Application are the latest iterations in a series of speculative schemes promoted by the Applicant. Previously, in relation to the licensing application, the Applicant informed the Council and local residents that it needed to build out a hospitality

offering (as per the extant consents for hospitality units and the licensing consent) to support the day-to-day running of Parnham Park whilst restoration took place. This was set out in several versions of a business plan produced during April–September 2022. Those plans never came to fruition. The hospitality units were never built. No further restoration works took place. Instead the Applicant submitted the ED Application.

- 6.6 The Applicant has not demonstrated that ED is the last resort, is the minimum amount necessary, or that its proposed “private home and hospitality use” is the optimum viable use. Delivery of the “vision” for Parnham House requires finding a huge sum of additional money, beyond the proceeds of the ED.
- 6.7 Furthermore, the Applicant has not demonstrated that the disbenefits are outweighed by the benefits it claims. Indeed, the Applicant acknowledges that the Parnham House works alone are not sufficient to outweigh the disbenefits. And yet it seeks consent to proceed with a hugely ambitious and financially risky scheme with optimism as its saving grace.
- 6.8 It is still not clear what the conservation needs of the place are; it cannot be that those needs are only met by rebuilding it. There are alternatives. And appropriate and acceptable alternatives may be cheaper and more deliverable. They might not even require enabling development, or indeed justify it because the conservation deficit would be less.
- 6.9 Whatever the ambition or vision of the current proposals, the obstacles to its delivery are inherent. This is not conjecture: it is a fundamental feature of the proposals because of the enormous funding gap. So much is dependent not only on the ED, but on finding money that does not exist today and may never materialise.
- 6.10 These obstacles are why the ED Application does not meet the tests of para 221 NPPF: the proposals cannot be said to secure the future conservation of the heritage asset. The ED secures nothing by itself and therefore there is a risk that the disbenefits arise without any of the purported benefits.
- 6.11 In addition, the ED leads to direct permanent and irreversible harm to the NL and its ecology and environment, and to the amenity of those lucky enough to live in or visit this special area.
- 6.12 In any case, the Applicant cannot deny the clear disbenefits and has not done so (to some degree); it hopes that the mere prospect of some potential benefit might be enough. However, in many cases, those asserted benefits are not real benefits.
- 6.13 The benefits of the proposals, such as they are, cannot be said to outweigh the disbenefits. They are unlikely directly to benefit Beaminster and the surrounding area. In many cases they amount only to financial benefits for the ED developer and the Applicant.
- 6.14 Whilst immersed in the detail of a planning application such as this it is easy to lose sight of what is at stake here as a result of the ED Application. It is about the future of a finite and valuable resource that is sensitive to change and vulnerable to development pressure; and a landscape and environment that is treasured by both local people and visitors.

- 6.15 This environment does not have to be damaged and destroyed for the purposes of one building – certainly not one person's vision. There is no policy or legal basis for concluding otherwise. Indeed, the legal and policy framework is clear and does not support the grant of planning permission.
- 6.16 If this Application is granted planning permission, the destruction and damage will be permanent and irreversible, the special qualities of this area will be lost to future generations. Responsibility for that would lie with our elected representatives.
- 6.17 We value what we have, and we want to cherish and preserve it, its "special qualities", for now and future generations and to retain its cultural, heritage, landscape, ecological and emotional significance.
- 6.18 As William Barnes wrote:

**Sweet Be'mi'ster, that bist a-bound
By green an' woody hills all round,
Wi' hedges, reachèn up between
A thousan' yields o' zummer green,
Where elem's lofty heads do drow
Their shiades vor hây-meakers below,
An' wild hedge-flow'r's do charm the souls
O' maïdens in their evenèn strolls.**

- 6.19 Even though the elms and the haymakers have gone, and rural life in West Dorset has changed, it takes no imagination to see and experience the local landscape of Beaminster, and its beauty and charm, in the same way that must have inspired Barnes to celebrate it as he did.
- 6.20 We urge the Council to refuse planning permission for the ED Application and thereby respect, conserve and enhance what is special about this unique place.

Report A – The Funding Gap

Securing the Future Conservation of the Heritage Asset: The Funding Gap, Unreliability of assumptions and non- compliance with HE GPA4

1. This Report analyses the financial information included within the Application by reference to the NPPF and HE GPA4. It has been prepared by members of Dorset Natural Heritage Initiative (DNHI) with extensive experience in finance and law.
2. The purpose of the Report is to demonstrate to the Council a number of material weaknesses in the financial information provided in the Application, which materially undermine the case that the proposals “secure the future of the heritage asset” (para 221 NPPF).

Introduction – the policy and guidance requirements

3. The principal consideration regarding the financial aspects of a scheme comprising ED is that – per para 221 of the NPPF – they would **“secure the future conservation of a heritage asset”**. The proposals included in the ED Application would not do so. The Council should have significant doubt as to whether the Applicant’s assumptions are reliable and whether a substantial funding gap can be closed. As it stands, the tests of para 221 NPPF are not met.
4. It is important to have regard to some of the key principles of enabling development, set out in HE GPA4:

para 15: “The defining characteristic of enabling development is that it would secure the future conservation of a heritage asset”, and therefore that “the future conservation of the asset is secured and the disbenefits of departing from conflicting planning policies are outweighed by the benefits”: and

para 16: “In practice this means a decision-maker being satisfied that a scheme of enabling development would securely provide for the future of the heritage asset”.

5. It is the responsibility of the Applicant to provide sufficient information to demonstrate that the tests of para 221 NPPF and the requirements of HE GPA4 are met. The Application does not contain all of the information required by HE GPA4 in support of an application for ED; and the information that has been provided does not fulfil the requirements of GPA4.
6. Therefore, it cannot be said that the Applicant has demonstrated that its proposals would secure the future conservation of the heritage asset. As a result, it cannot be found that the purported benefits outweigh the disbenefits.
7. Detailed comments on the material contained in the Application – with reference to HE GPA4’s requirements – are set out in the paragraphs below. These address:
 - a. The conservation deficit and the lack of evidence of consideration and assessment of alternatives.
 - b. The funding gap.
 - c. The unreliability of the ED appraisals (including the lack of any sensitivity analysis).
 - d. The impact of commercial arrangements with the ED contractor.
 - e. The lack of a coherent and specific Business Plan for future operations.

The Conservation Deficit

8. The Savills Enabling Development Report (ED Report) identifies the gross conservation deficit as £17,859,726; the contribution from the ED as £17,800,000; and the net conservation deficit as £59,726.
9. As the Council will be aware, the conservation deficit is (per HE GPA 4 para 9):

“the amount by which the cost of repair (and conversion to optimum viable use if appropriate) of a heritage asset exceeds its market value on completion of repair and conversion, allowing for all appropriate development costs.”
10. It may be simply coincidental that the gross conservation deficit and the ED contribution are broadly the same number.
11. In any case, the existence of a conservation deficit is only the method by which to identify *ab initio* if there is a case for ED.
12. However, it is a material consideration that the conservation deficit of £17.8m is the direct result of the scale and costs of the Applicant’s preferred scheme for Parnham House. This scheme is the development of a “private house with hospitality offering” at a total cost of £32.7m.

13. As the Council noted in its pre-application response of 13 December 2024, there may be other schemes that might secure the future preservation of the heritage asset: “we encourage you to also explore alternative options and funding sources which would still deliver significant heritage benefits, but with reduced harm.” The point being that less expensive and expansive proposals may be sufficient to secure the future conservation of the heritage asset; and that such proposals would result in a lower conservation deficit.
14. It is not possible to distinguish from the figures presented in the ED Report which costs are directly related to solving the conservation needs of the place, and which relate to other works, facilities and installations related to the creation of a private house. A private house with an uncertain hospitality offering cannot be claimed to be the “optimum viable use”.
15. In this respect, para 14 of HE GPA4 is relevant and important:

“The sums of money generated through enabling development are provided to directly solve the conservation needs of the place, not to solve the financial needs of the present owner, to support/finance a business or to compensate for the purchase price paid for the site. The amount of enabling development that can be justified will be the minimum amount necessary in order to address the conservation deficit and to secure the long-term future of the assets.”

16. DNHI has significant concerns that the scheme as put forward by the Applicant is an attempt to use ED to create a private home and to support/finance a potential business. The significant cost of the proposed works to Parnham House (the Parnham House Scheme), and therefore the size of the alleged conservation deficit, is only the result of the scope and scale of the Parnham House Scheme to create a private home with guest bedrooms.
17. Serious consideration must be given to whether those works can properly be seen to “directly solve the conservation needs of the place”, are necessary in totality to achieve that goal, and whether a less ambitious and grandiose scheme would be sufficient and appropriate.
18. Further comments on the Applicant’s approach to alternatives are set out below at point 58.
19. In any case:
 - a. The contribution from the ED only part-funds the Parnham House Scheme. This means that there is a significant funding gap to close to complete the Parnham House Scheme.
 - b. The costs of the Parnham House Scheme, and the stated contribution from the ED, are both highly susceptible to minor but reasonably foreseeable adverse sensitivity factors (such as increased construction and higher funding costs (although funding cost sensitivities are not addressed), lower sales values for the residential units), resulting in a lower contribution from the ED and an increase in the funding gap.
20. These are addressed in the following paragraphs.

The Funding Gap

21. As stated above, the ED will only – on the Applicant’s own assessment – provide a portion of the total funding required to complete the identified scheme for Parnham House: £17.8m of a total cost of £32.7m.

22. In addition, the Applicant (ref the ED Report and Business Plan) will need to construct additional hospitality units under extant permissions, and the additional Dower House, in order to provide the facilities, which are apparently required to generate income for future maintenance. The Applicant states without supporting evidence from Savills that the costs of these elements is £15.0m.

23. In summary:

Item	£m
Cost of works to Parnham House	32.7
Less Proceeds from ED	-17.8
<u>Parnham House Scheme Funding shortfall</u>	<u>14.9</u>
<u>Plus cost of building hospitality units</u>	<u>15.0</u>
Minimum Funding Gap	29.9

24. This is described here as a “Minimum Funding Gap” because both the cost of works to Parnham House and the proceeds from the ED are vulnerable to adverse impacts arising from reasonably foreseeable sensitivity scenarios.

25. It is noted that the Applicant did not provide any detailed sensitivity analysis in the Application version of the ED Report. An updated report including sensitivity testing was published on 8 January 2026. This is addressed at point 35 below.

26. The Applicant assumes that it will **not be required to pay any community infrastructure levy (CIL): £2.75m**. As there is no exception in place – and DNHI contends there should not be – this is an unsafe and unreasonable assumption. Whilst it may be argued by the Applicant that CIL payment would further deteriorate viability, it is not of itself the main issue over the viability and securing the future conservation of the asset. This is a function of the Minimum Funding Gap, and (as further explained below) the vulnerability of the Applicant’s appraisals to minor but reasonably foreseeable adverse sensitivity factors.

27. Moreover, the Applicant has not set out how they will address this Minimum Funding Gap.

28. Whilst HE GPA 4 (para 17) acknowledges that ED proposals may only be part of a solution to an asset’s continued conservation, it is explicit that “**the solution as a whole will need to be identified and shown to be deliverable and complete**”. The Applicant will not be able to rely on proceeds from the ED to fund the whole solution. It must, therefore, explain how it will obtain the additional funds necessary to complete its scheme. Otherwise, the Council cannot be satisfied that the future conservation of the asset is secured and there is a material risk that the conservation scheme on which ED is predicated does not occur. This in turn undermines the justification for the ED *ab initio*.

29. In such a case as this, the decision maker must refuse planning permission – see para 21 HE GPA4 (our emphasis):

"Para 21: "A decision-maker can only properly decide if the development is justified if they can assess the full scale of the enabling development needed to deliver the necessary benefits to secure the future of the heritage asset Where an enabling development project forms only part of a scheme to fully fund the restoration, repair and maintenance for the foreseeable future, the applicant must provide information relating to the complete scheme and how it will be secured through the development. If the comprehensive scheme proposed is not sufficient to deliver all the required funding, then the applicant will not be able to show that the objective of paragraph 202 is met, because the future conservation of the asset is not secured".

30. Therefore, the need for an applicant to explain how the whole of a scheme is to be funded (and therefore deliverable) is explicit. The fact that there is a Minimum Funding Gap is obvious. It is not clear why the Applicant has chosen not to provide the necessary information. It is clear that such funding would either need to come from the Applicant's own resources, or through external private or bank financing. Either way, it cannot be ignored.
31. The absence of this information in the face of an explicit requirement is significant. Whatever the reasons, ED is not a tool or opportunity for undertaking speculative redevelopment. It will be noted that the Savills Report (page 10) states that of ten potential bidders for Parnham Park in 2019 "*virtually all parties presented uncertainties connected with planning outcomes or availability of sufficient finance*". Little is likely to have changed for the better.
32. On the basis of the view of experienced banking professionals involved in DNHI, limited if any weight should be given to any assertion or assumption that the Minimum Funding Gap will be covered by bank financing. The Applicant's own reports give a value of the asset post works (we assume including both the House itself and all hospitality units) of between £14.8-19m. This is £10-15m below the total minimum funding shortfall i.e. a loan to value ratio of over 150%. This is unheard of.
33. Despite not identifying how it would fund/finance the scheme, it is notable that the Applicant has given consideration to how it would obtain reimbursement for funds spent on Parnham House to date. The draft S106 HoTs submitted by the Applicant provide a mechanism (clause 6.2.1) for the Owner (as defined in that document) to immediately withdraw from sums deposited in the escrow account an amount in respect of works it has already carried out to Parnham House. The effect of this would be to further reduce the sums available for the Parnham House Scheme. Further comments on the S106 HoTs are provided below.

34. Overall, the significant risks to the availability of sufficient funds for the whole of the proposals should raise concerns for the local planning authority that it can (per HE GPA4 para 25):

**“... ensure that long-term conservation of the heritage asset is secured
... thereby avoiding the need to revisit consents with a view to
approving further development”**

Unreliability of ED Appraisals – sensitivity

35. Whilst it is noted that HE GPA4 requires the use of current figures in compiling development appraisals, it advises that it is good practice for an applicant to carry out sensitivity analysis (para 54).

36. The relevant sensitivities to be applied are standard in development appraisals. They include:

- a. Construction price inflation (labour, materials)
- b. Unforeseen construction risks – typically those that a contractor will not bear the risk of such as ground conditions, weather, etc.
- c. Financing costs on debt over construction period; and increases in financing costs
- d. Lower sales prices for completed units
- e. CIL liability (the Applicant assumes there would be an exception)
- f. Tax due on capital gains on sale of land
- g. Affordable housing provision
- h. Any deductions the Applicant will make for works already carried out

37. The Applicant did not originally provide any such analysis, although an updated version of the ED Report submitted on 8 January 2025 (some considerable time after the validation of the ED application) attempted to correct this omission.

38. Our own analysis is that the assumed receipts of £17.8m from the ED are not robust and on a reasonably cautious assessment are likely to be much less. Small adverse changes in the underlying inputs give rise to significant reductions in expected receipts from the ED, and therefore funds available for the Parnham House Scheme. This in turn increases the funding shortfall and increases the risk of non- or incomplete delivery.

This analysis is supported by Savills' own assessment in the updated ED Report although it is not clear what assumptions Savills used to arrive at its particular figures. The material issue is that applying different assumptions will produce different outcomes. or the assumptions it used.

39. It is not clear what assumptions Savills used to produce such small sensitivities. To a large extent that is not material to the issue at hand: that small adverse changes in the underlying inputs give rise to significant reductions in expected receipts from the ED, thereby reducing the available funds for the Parnham House Works.

40. There is no sensitivity analysis of funding costs in the Savill's ED Report (financing costs on debt over construction period; and increases in financing costs). This is a material omission. Adverse increases in funding costs will diminish proceeds from the enabling development. It cannot be ignored.
41. What is clear on any of these analyses is that a development of this scale and nature will be vulnerable to sensitivity changes (and depending on the assumptions used), which have the potential to impact on the actual proceeds from the ED. We urge the Council to obtain its own independent financial advice on sensitivities.
42. We refer to our remarks above in relation to CIL.
43. In addition:
 - a. The Applicant has assumed **nil provision of affordable housing**. The Applicant has not presented any justification as to why the Council's affordable housing policy requirements should not apply. This absence from the development appraisal is conspicuous and at odds with planning policy and standard practice. It is taken as a given;
 - b. The **assumed residential units' sales values are not adequately justified, bearing** in mind the units are in small plots with small gardens within a modern housing estate. Current data on house sales prices for the area does not support these valuations. References to comparable property sales are focussed on sales more than two years ago and cannot be a basis for prospective current or future sales values in view of the significant slump in the housing market over the last two years, particularly in West Dorset and East Devon; and
 - c. The Applicant has not disclosed whether there would be any **liability for tax** on capital gains on sale of the land, if applicable. If there is such a liability, it would further reduce the value of receipts from the ED.
44. Taken together, **the vulnerability of the assumptions in the appraisals to reasonably foreseeable minor adverse sensitivity factors casts significant doubt on the overall viability and deliverability of the proposals as a whole**. The Council should have significant concerns about the realism of the Applicant's assertions and – overall – the probability that the Parnham House Scheme as a whole is capable of being delivered. In such a case as this, **HE GPA4 is clear at para 21 that planning permission should be refused**.

Commercial Arrangements with the ED contractor

45. A major factor that will determine the actual contribution of the ED to the Parnham House Scheme will be the provisions of the contract agreed with any ED developer. No information is provided on this component.
46. The Applicant's agents have suggested that the residential units in the ED will be long-leasehold, implying that the Applicant would retain the freehold. This may be a means to secure service and other charges. Significant legislation is currently before Parliament in this regard.

47. Even without knowing the actual details of the arrangements, the reasonably foreseeable adverse sensitivity factors (such as increased construction and funding costs, lower sales values for the residential units) are likely to present material commercial risks to a developer's overheads and profit.
48. This is relevant because it should be expected that a developer will need to ensure, having regard to the various sensitivity scenarios, that it receives sufficient (and a minimum) overhead and profit to make carrying out the development a commercially sensible endeavour, and not at a loss. It is unlikely that a developer would make a lump sum payment up front.
49. This is important because any adverse impact on the assumed proceeds for the ED related to the relevant sensitivity factors is not likely to result in an equivalent reduction in developers' overheads and profits. In tandem with the impact of adverse sensitivities, this will further reduce the proceeds from the ED below the estimated £17.8m.
50. This fact is acknowledged in the S106 HoTs: no specific sum is provided for payment into the escrow. It will be a matter for later determination.

Business Plan

51. The Council's pre-application advice of 13 December 2024 made clear – reflecting HE GPA4 – that the Applicant would need to demonstrate that their proposals represented the optimum viable use of the heritage asset. This reflects the clear requirements of HE GPA4 (para 14). This was by reference to the proposed hospitality operation.
52. Generally, it is difficult to identify the details or nature of the business the Applicant asserts will exist in future. It is described as a private house with a hospitality offering. No detail is provided as to how much surplus cash flow would be derived from the hospitality business and lettings or the cash required to fund the maintenance costs of the heritage asset, let alone to service and repay any construction finance.
53. However, at paragraph 5.1 of the Business Plan, Savills state that "... it is critical that the expenditure is partially offset by the creation of income streams from the nascent hospitality offer, as it has been described in this Business Plan." No details are given about the timing or delivery of the facilities that are apparently critical to future expenditure; and by extension that non-delivery would undermine future viability.
54. In general, the Business Plan is weak and profoundly unreliable. Clear deficiencies are as follows:
 - a. There are no projected cash flows and balance sheets backed by detailed assumptions, including inflation: the standard would be for a period of five years or a period corresponding to completion of the various construction phases of the hospitality business and the establishment of a steady state trading performance once construction has finished.
 - b. There is no risk analysis and mitigation plan of all the hazards which may impact on the success of a start-up business. Savills state in the Business Plan that trading will not commence until construction is complete – likely to be three to six years away from determination of the application, if granted consent. Given the Minimum

Funding Gap and the potential – for example – of any immediate repair requirements for Parnham House, together with day-to-day running costs of the whole park, such drains on cash flow could adversely impact the ability to launch a business when the time comes. It should be assumed that a significant contingency is required to cover interim costs.

- c. There is no provision for regulatory and other compliance costs associated with running a hospitality business, such as fire risk, health and safety, wage inflation;
- d. There are no figures to support cash flow assumptions for the maintenance and operation of the heritage asset. The Business Plan does not therefore demonstrate how any future hospitality business would cover future maintenance / conservation costs for the heritage asset.

55. As this is a fundamental element of establishing the “benefit” of the proposal vis-à-vis “the future conservation of a heritage asset”, the Business Plan is incomplete and does not meet the requirements of HE GPA4.
56. Moreover, there is no information on the expected annual maintenance costs for the heritage asset – [ref GPA 4]. The Savills Business Plan (page 16) states that annual operating costs of Parnham Park are £420,000 per annum. This does not include heritage maintenance costs.
57. Overall, the Business Plan does not demonstrate how any future business operation would cover heritage asset maintenance costs but, in any case, the lack of a guaranteed and defined cash flow is unlikely to be sufficient as a basis for lending against future operational revenue.

Alternatives / marketing and optimum viable use

58. Although we understand that the Applicant has presented alternative designs for the ED to the Council, the Application Documents do not present or consider a range of possible options or alternatives such that the ED Application can be seen as an unavoidable solution to the future conservation needs of the heritage asset. As advised by para 32 HE GPA4:

In order to establish if enabling development can be justified and therefore unavoidable, the owner or developer will need to fully explore a range of possible options. This may include public or charitable ownership, grant funding, alternative uses or ownership and enforcement remedies. It is important that a wide range of realistic possibilities is considered, not just the original or most recent uses although the original use may still be the most appropriate one.”

59. The Application Documents do not analyse a range of alternative solutions, including alternative schemes for the future conservation of the heritage asset.
60. The Savills ED Report relies on conversations with Knight Frank about the marketing of the Parnham Estate carried out by them in 2018 and 2019. This is the limit of its consideration of

alternatives to the ED. This does not satisfy the requirements of HE GPA4. In this way, the Council cannot be satisfied that ED is unavoidable. There is no explanation of what alternatives have been considered.

61. Instead, the ED Application is framed on the basis that the ED and related Parnham House Scheme are the only scheme. In fact, they are the scheme that the Applicant wishes to promote. That does not make it the right or most appropriate scheme, certainly given the apparent undeliverability of the scheme as a whole; and thereby the risk that the disbenefits of the ED are delivered without any of the purported benefits.
62. It cannot be the case that the current proposals are the only solution or option. Indeed the Council's pre-application advice of 13 December 2024 refers to Option A Masterplan and Option B Masterplan. Significantly, that pre-application response also stated: "*we encourage you to also explore alternative options and funding sources which would still deliver significant heritage benefits, but with reduced harm.*" The Applicant's representative suggested "a romantic ruin". No proposals were tabled but, the response states, "*whilst it would deliver lesser heritage benefits [to Options A and B] it would restore parts of the building and retain elements of the existing façade; significant benefits in their own right.*" [Our emphases].
63. In this respect, the Applicant has not demonstrated, as required by HE GPA4 para 32, that it has fully explored a range of options, not just variations of the ED scheme, or a wide range of realistic possibilities. The Applicant cannot therefore show that enabling is justified.
64. Moreover, if the Minimum Funding Gap is not closed and the Applicant can only complete part of the Parnham House Works, it would not deliver the conservation scheme on which the ED Application is predicated. In such a scenario, the justifications for the ED would not exist at the point of delivery of the Parnham House Works, meaning the purported benefits would not arise. That would undermine the basis for claiming that the benefits of the proposals outweighed the disbenefits.
65. We also consider that the Applicant has not demonstrated satisfactorily – per para 14 HE GPA14 that: "**The amount of enabling development will be the minimum amount necessary in order to address the conservation deficit and to secure the long-term future of the asset**".

Conclusion

66. It should be borne in mind that the Application is the latest in a series of schemes promoted by the Applicant. Previously, in relation to the licensing application, the Applicant informed the Council and local residents that they needed to build out a hospitality offering (as per the extant consents for hospitality units and the licensing consent) to support the day-to-day running of Parnham Park whilst restoration took place. This was set out in several versions of a Business Plan produced during April-September 2022. The Business Plan includes the statement:

"It is therefore critical to the success of this high-profile restoration that the nascent hospitality business is established by 2023."

67. The Applicant has never brought these plans into effect. There is no evidence as to why this is the case, or why these plans would not support his ambitions for Parnham Park, even though they can be considered to be alternative approaches that require analysis.
68. DNHI urges the Council to give significant weight to the inherent risks in these proposals, namely that the funding shortfall is so great that the Parnham House Scheme may never be delivered, or indeed the full hospitality offering. If this were to occur, the disbenefits that arise from the ED would not be outweighed by the asserted benefits. This possibility is a material consideration that cannot be deferred to an assessment after grant of planning permission. It must be considered at the time that the application is determined in order to properly apply the tests in para 202 of the NPPF. If realisation of the benefits is uncertain (in our opinion, uncertain and unlikely) then they cannot be said to outweigh the disbenefits now, no matter how attractive those benefits might seem. To grant planning permission in such circumstances would be unsound and open to legal challenge.
69. In the absence of committed financing at the outset for this project there is a clear risk that the scheme will not be completed in its entirety. This may take the form of a limited and more focussed investment in Parnham House using such enabling development funds as are available, which might give the Applicant a nice wing of a stately home bought for only £2.5m – but at substantial public disbenefit. Alternatively, it would be accompanied by a request for further enabling development.

Report B – Landscape Appraisal

Parnham House - Enabling Development

Landscape appraisal
for Dorset Natural Heritage Initiative
January 2026



Stephen Laws
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Parnham House - Enabling Development

Landscape appraisal for Dorset Natural Heritage Initiative January 2026

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Executive summary



View from public footpath (W21/62) towards parkland on the Parnham Estate and the Enabling Development. Reference to view 9 in the ES Chapter 6 indicates there is likely to be some visibility of the development from this location.

1	<p>It would be reasonable to assume that the current scheme presented in the Planning Application is considered by the Applicant to represent the best design solution for the Enabling Development.</p>	6	<p>There are four long distance paths/promoted routes which converge at Beaminster, Parnham Park and through part of enabling development site. Of special note is the Hardy Way which takes the traveller on a journey through Wessex and Dorset to celebrate the life and works of Thomas Hardy. The walk was created by Margaret Marande and described in her book <i>The Hardy Way - A 19th Century Pilgrimage</i>. Visit Dorset promotes the Hardy Way as a long distance walking trail visiting places associated with author and poet Thomas Hardy.</p>	9	<p>As a result of the significant adverse visual effects experienced from public footpaths it is clear that potential changes in the local landscape are highly visible, especially in winter views (i.e. for 6 months of the year). These views will alter the perceived visual character of the local landscape to the detriment of local amenity and the appreciation of the natural beauty in this part of the AONB.</p>
2	<p>The enabling works site lies within a landscape of national importance and in a Registered Park and Garden (RPG) forming part of the wider Parnham estate containing a Grade I Listed Building (Parnham House). The high sensitivity of the local landscape is more than simply a reflection of these designations, it also relates to the value of the local landscape in terms of its contribution to the setting of local heritage assets and the town (including Beaminster Conservation Area), the inherent beauty of the Brit Valley landscape, the high amenity value of numerous footpaths/bridleways and long distance paths and the cultural connections to Thomas Hardy.</p>	7	<p>The Applicant's own ES concludes that the long term residual landscape effects on the enabling site and Parnham Park (Grade II Registered Park and Garden) would be substantial. I would agree with this assessment. My own appraisal concludes that the following significant adverse landscape effects within the AONB will occur due to the proposed development.</p>	10	<p>Even minor views from these paths create significant adverse impacts when visibility of development in the open countryside has the effect of creating a notable perceived shift in the settlement edge of Beaminster. This in turn alters the landscape context (setting) of the Conservation Area and the heritage assets at Parnham</p>
3	<p>In landscape terms, the sensitivity of the parkland which will accommodate the development, is no less sensitive than other parts of the Registered Park and Garden. Indeed, it is the most visible part of the RPG in public views.</p>	4	<ul style="list-style-type: none"> • Change in the landscape character of Parnham Park • Change in the landscape character of parkland in Parnham Park • Change in the landscape character of the River Brit Valley between Beaminster and Parnham House • Change in the setting of Parnham House • Change in the setting of Parnham Park Registered Park and Garden • Change in the setting of Beaminster Conservation Area 	11	<p>The parkland is the most publically visible part of the Parnham RPG and clearly visible from promoted long distance footpaths. From some footpaths the parkland is the only part of the RPG visible in local views. The entire site is visible from multiple local footpaths/bridleways and long distance routes resulting in significant adverse long term visual effects. These adverse effects will persist regardless of proposed mitigation.</p>
5	<p>The parkland at Parnham forms part of the setting and landscape context of the Beaminster Conservation Area. The Beaminster Conservation Area Appraisal recommends that the contribution of the landscape setting and trees to the conservation area should be perpetuated using all means possible. It is clear that this remaining part of the river valley setting has only been safeguarded due to the designation and integrity of the adjoining parkland landscape.</p>	8	<p>Drawing on the assessment in the ES and my own site analysis it is clear that almost every local public footpath/bridleway with potential views of the Enabling Development will be significantly adversely affected due to the change in view and the length of path effected. The bridleway through Parnham Park is significantly affected for almost the entire route through the designated RPG. Moreover, there are significant views of the Enabling Development from every long distance path which passes close to Parnham Park or through the town.</p>	12	<p>All the above factors elevate the value, sensitivity and adverse impact on local receptors and the landscape above that which could occur in other parts of the AONB.</p>
				13	<p>For these reasons and other matters set out in this statement I am of the opinion that the proposed development would be in conflict with the local policies listed below and NPPF paragraphs 189, 190, 208, 221.</p> <p>ENV1 - Landscape, seascapes and sites of geological interest ENV3 - Green infrastructure network ENV4 - Heritage assets ENV10 - The landscape and townscape setting ENV12 - The design and positioning of buildings ENV15 - Efficient and appropriate use of land ENV 16 -Amenity</p>



View from the edge of Edmund Coombe Coppice towards Beaminster and the Conservation Area illustrating the landscape setting around the southern margins.

14 I do not consider that the benefits of the proposal outweigh the disbenefits insofar as these relate to landscape and visual effects and local amenity. These disbenefits occur despite the mitigation measures incorporated into the design proposals and the fact the scheme represents the best solution currently put forward by the Applicant.

15 Most of the important heritage assets on the estate, including Parnham House, are completely hidden from public view and make no contribution to the visual character of the local landscape. The proposed development would be located in parkland in the northern part of the RPG. The parkland is of high local landscape value due to its designation and its vital role in safeguarding the landscape setting of the Conservation Area and the amenity/landscape value of the River Brit valley which forms the immediate setting. This part of the Parnham Estate is the only area which is publicly accessible in the RPG. The public bridleway crossing the parkland is promoted as a long distance trail through Dorset and the AONB. Retention of the parkland therefore has considerable public benefit and, it could be argued, this benefit is greater than other parts of the estate, or indeed, any public benefit that could be derived from the Enabling Development.

16 The proposed development would be located on attractive parkland, the most prominent part of the historic landscape in public views. At completion, the development would reinforce the relationship between Parnham House and Beaminster in a way which was never originally intended. Geographically, Parnham House sits midway between Beaminster and Netherbury with the main house orientated away from both settlements. The parkland to the north was a later addition and maintains separation between Beaminster and Parnham House, safeguarding the setting of the adjoining Conservation Area. To the casual observer the development will resemble a gated community - separate and distinct from the adjoining town but also visually dominant within the countryside setting of Parnham Estate which otherwise discreetly accommodates the historic buildings and formal gardens.

1 Introduction



View towards Beaminster and the Parnham Estate across the AONB from elevated land on Mintern's Hill.

INTRODUCTION

1.1

This Landscape Statement has been prepared by Stephen Laws, a Chartered Landscape Architect with 40 years' experience. I have worked on a large range of commercial projects requiring site planning, landscape design and landscape impact assessment. Commissions include landscape assessment for housing development, energy infrastructure and commercial schemes. My project work is often concerned with development in sensitive landscapes including National Parks, AONB and historic sites such as Blenheim Palace. I have acted as expert witness for developers, local authorities and resident groups at appeal against refusal of planning permission. In 2024, I provided professional expertise to Darlington Borough Council on the National Strategic Infrastructure Project (NSIP) Byers Gill Solar Farm.

1.2

I previously acted as expert witness for residents at the appeal for an Enabling Development at Fold House, Riding Mill in County Durham. The Enabling Development was refused planning permission on appeal and was later refused permission on multiple occasions following resubmission of the design proposals.

1.3

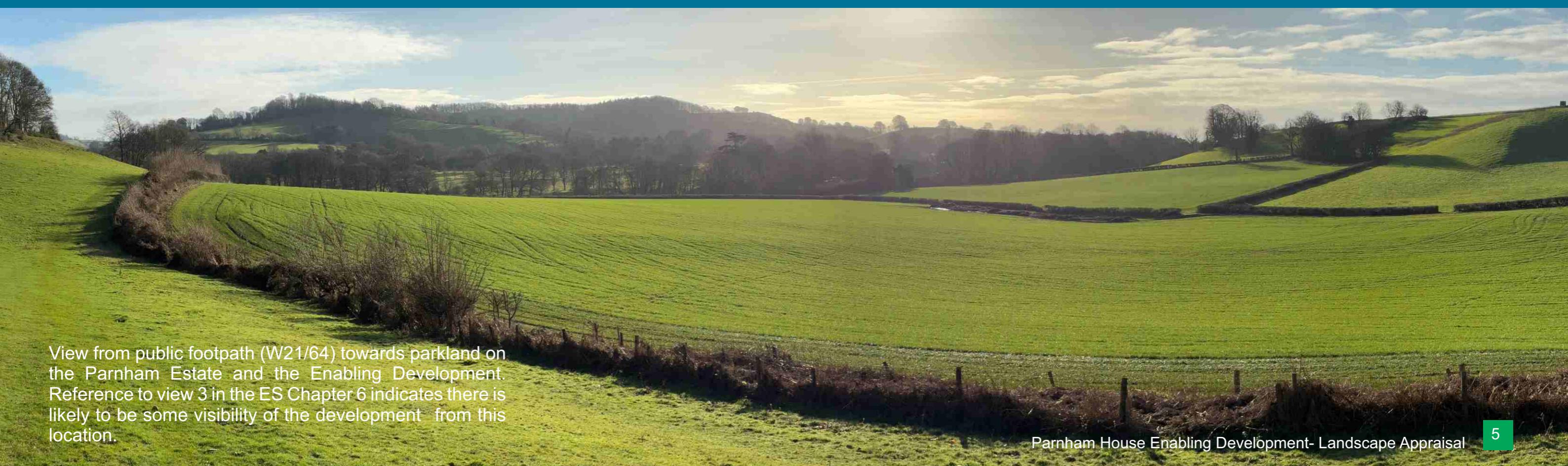
This document provides an appraisal of likely landscape and visual effects generated by the proposed Enabling Development based on a review of the information contained in the Planning Application and independent analysis of the baseline conditions. Where possible, the descriptions of baseline information in this report have been summarised to avoid repetition of text contained in the ES. Some descriptions have been expanded upon where additional explanation is considered helpful and of relevance.

1.4

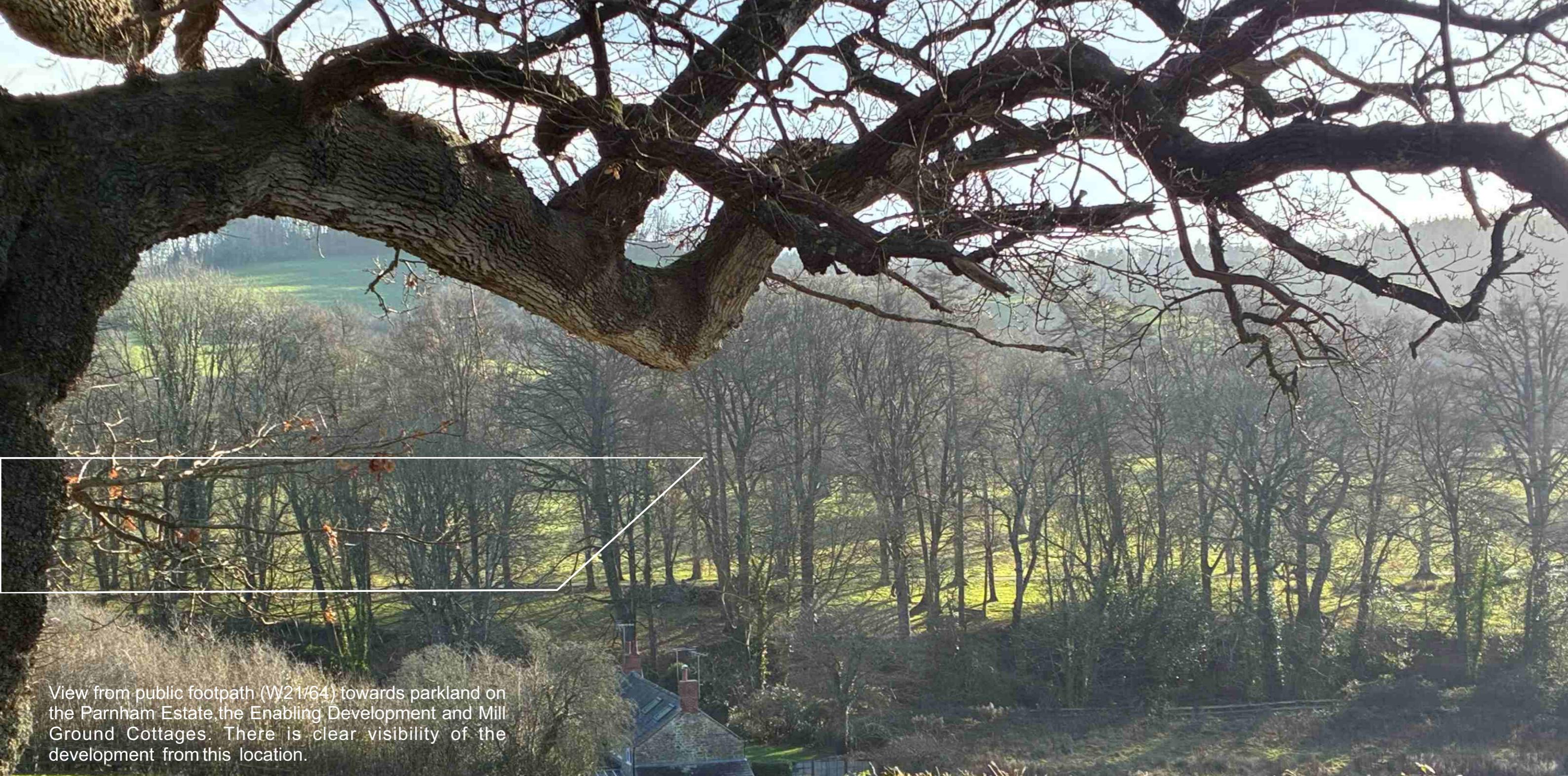
This report does not deal in depth with design matters relating to the Enabling Development but it does provide a general overview and critique of the proposals where such matters have a bearing on landscape and visual effects and compliance with policy/guidance.

1.5

This Landscape Appraisal represents the response by Dorset Natural Heritage Initiative (DNHI) on the current planning application (P/FUL/2025/06865), in relation to landscape and visual amenity impacts generated by the Enabling Development.



View from public footpath (W21/64) towards parkland on the Parnham Estate and the Enabling Development. Reference to view 3 in the ES Chapter 6 indicates there is likely to be some visibility of the development from this location.



View from public footpath (W21/64) towards parkland on the Parnham Estate, the Enabling Development and Mill Ground Cottages. There is clear visibility of the development from this location.

2 Background Information



DEVELOPMENT DESCRIPTION AND DESIGN ITERATION

2.1

The description of the development in the planning application is as follows;

Conservation and restoration works to the fire damaged South Wing of Parnham House including reinstatement of the roof, floors and walls, and refurbishment.

Enabling development to fund the overall conservation and restoration works at Parnham House (to the optimum viable use as a private home with a hospitality offering), involving the erection of 82 dwellings and two visitor accommodation lodges, together with the provision of associated infrastructure including bridge crossing of the River Brit, leisure facilities, surface water drainage features, landscape and biodiversity works, alteration to existing vehicular access and diversion of existing public right of way.

2.2

The Applicant's Planning Statement lists planning approvals for works on the Parnham Estate since 2021 and also presents a site plan showing existing and proposed development on the estate.

2.3

The Planning Statement refers to discussions with the Planning Authority and Historic England since 2020 on matters relating to development including pre-application advice on two development options and a third option which involved partial restoration of the house. Proposals were presented at a public exhibition and also at a session of the Dorset Design Review Panel. The Applicant's Design and Access Statement (DAS) sets out the key feedback responses from the public consultation and Design Review. The Design Review feedback is summarised in the DAS and reproduced as follows;

- High level placemaking questioned, coherency required as to how many character areas are involved and whether the development is an extension of Beaminster, a parkland estate or a combination of both

- Concerns over potential costs in certain areas, particularly West of the river and inclusion of leisure facilities

- Concern over location of development at the end of St Mary Well street, in terms of topography and impact on the experience of the landscape

- Concerns over efficiency, particularly in terms of road layout and excessive parking provision, suggested three-storey building heights acceptable in places and more use of terracing / tighter spacing of dwellings drawing more from the streetscape and built patterning of Beaminster, use of connected streets rather than suburban roads and reduction in parking provision

- Concern over lack of sustainability ambition presented

- See the avenue as a real opportunity as a centrepiece for the development, giving it real uniqueness

- See the location and relationship to the heritage asset as an opportunity to maximise value, with public benefits being made more obvious

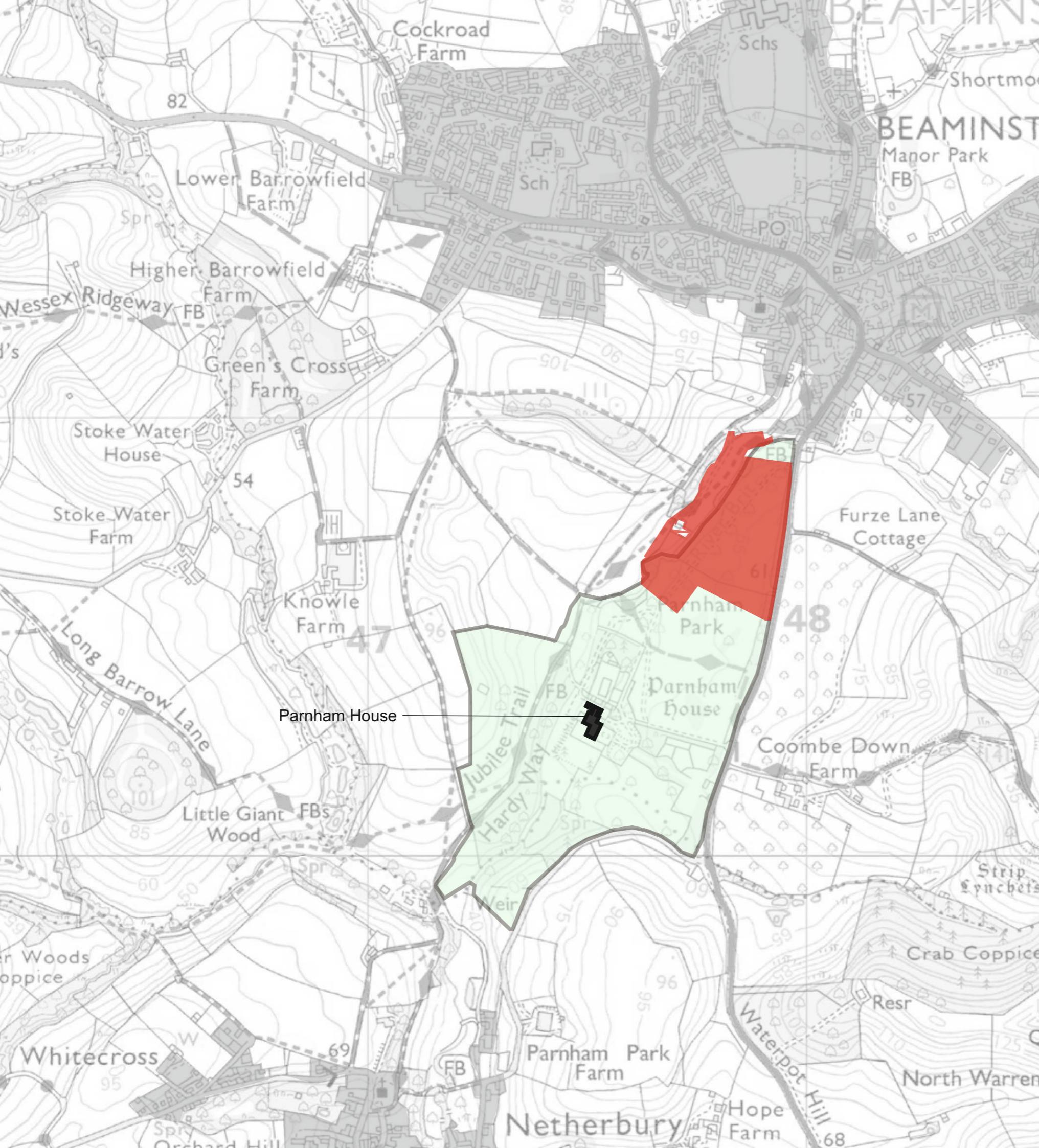
- Suggest straightening and formalising the deer park edge, rather than allowing a series of disconnected villas to bleed into the tree line

2.4

The Planning Statement confirms that design changes were made to the Enabling Development following public feedback and comments from the Design Review Panel. The DAS confirms that changes were made to omit development in the north western part of the site, improve place making, maximise the landscape setting and reinforce the main avenue by introducing 3 storey properties along its length.

2.5

Based on the above information and the detailed planning submission made to the Planning Authority it would be reasonable to assume that the current scheme is considered by the Applicant to represent the best design solution for the Enabling Development, notwithstanding previous comments received from consultees and residents on matters which may not have addressed by the current scheme layout.



POLICY AND GUIDANCE

2.6 The response to the Applicant from the planning officer dated 13 December 2024 refers to superseded layout Options A and B illustrated in the Design and Access Statement (November 2025) and earlier responses to the pre-application request. The officer's response dated 21 December 2022 lists relevant planning policies in the Adopted West Dorset and Weymouth & Portland Local Plan. It is reasonable to assume that these policies equally apply to the current proposals. Those which are relevant to this report are listed below.

- ENV1 - Landscape, seascapes and sites of geological interest
- ENV3 - Green infrastructure network
- ENV4 - Heritage assets
- ENV10- The landscape and townscape setting
- ENV12- The design and positioning of buildings
- ENV15- Efficient and appropriate use of land
- ENV16-Amenity

2.7 Appendix A in this report summarises the above policy matters insofar as they relate to this report. Appendix B summarises matters set out in the National Planning Policy Framework (NPPF) relevant to the Enabling Development and the site. Reference is also made to relevant text in Planning Notes 3 and 4. Appendix C contains extracts from the Dorset AONB Management Plan.



Enabling Development site



Registered Park and Garden

REVIEW OF THE APPLICANT'S DESIGN AND ACCESS STATEMENT

2.8

The DAS provides a detailed account of the design process and design iteration with commentary on site analysis, design cues/references, consultation and detailed design proposals. The following text has been extracted from the DAS. It highlights key factors which have underpinned the development proposals. I shall address these throughout my appraisal.

Design and Access Statement Part 1

Page 5. The Parnham estate is located to the south of the small market town of Beaminster and north of the village of Netherbury. There are a number of farms within a 1km radius of the site. Despite the close proximity, due to the nature of the parkland, its boundaries of mature vegetation and local topography, and the gated entrance **the estate is currently detached from the neighbouring settlement.**

Page 8. The aspirations of Parnham Park Estates is to create a new neighbourhood of the highest design quality. The architecture of the **proposed scheme has therefore been designed as a formal response to the historic context of Parnham as well as taking local references from Beaminster..... The southern area of the enabling development is designed as a transition between the new development, Parnham House and its immediate setting, and the deer park to the south.** Two gate lodges are proposed either side of the avenue which will create a secondary entrance to Parnham from the north. **The two lodges, which take design inspiration from historic pavilions at Montacute House in Somerset, will mirror each other and incorporate outdoor terraces and parking and stone walls to screen the parking.**

Design and Access Statement Part 3

(Para 2.2) Part of the site falls inside the Grade II* Registered Park and Garden. **For the last 80 years this area has been used solely for**

grazing and is bisected from North-East to South-West by both the River Brit and the tree-lined access driveway to the estate.

(Para 2.4) The analysis of heritage significance outlined in Part 2 of this statement identified **that the northern part of the Parnham Park parkland, being more remote from the principal built heritage assets clustered around the main house, is less important to their setting than those parts more immediate to them and so more able to accommodate change.** This is also the northern part of the Registered Park and Garden and is similarly less sensitive, particularly given its relative enclosure from outside view by trees and topography. The **findings of the Landscape Visual Impact Assessment, shown overleaf, support this.** Ecologically, past grazing use has also limited this area's value.

(Note. The LVIA does not support the assertion that the parkland is less sensitive. The sensitivity of Parnham Park is high and also the sensitivity of the enabling works site)

(Para 2.5) The area of the estate to the west of the River Brit is both remote from the principal built heritage assets and falls outside the Registered Park and Garden. In common with the wider area, the proposal site is within the Dorset National Landscape, although it is somewhat shielded from wider view by topography and trees.

(Para 2.8)The proximity of the site to Beaminster offers opportunities for design cues to be taken from the town and enhanced to create a truly unique "Parnham" development.

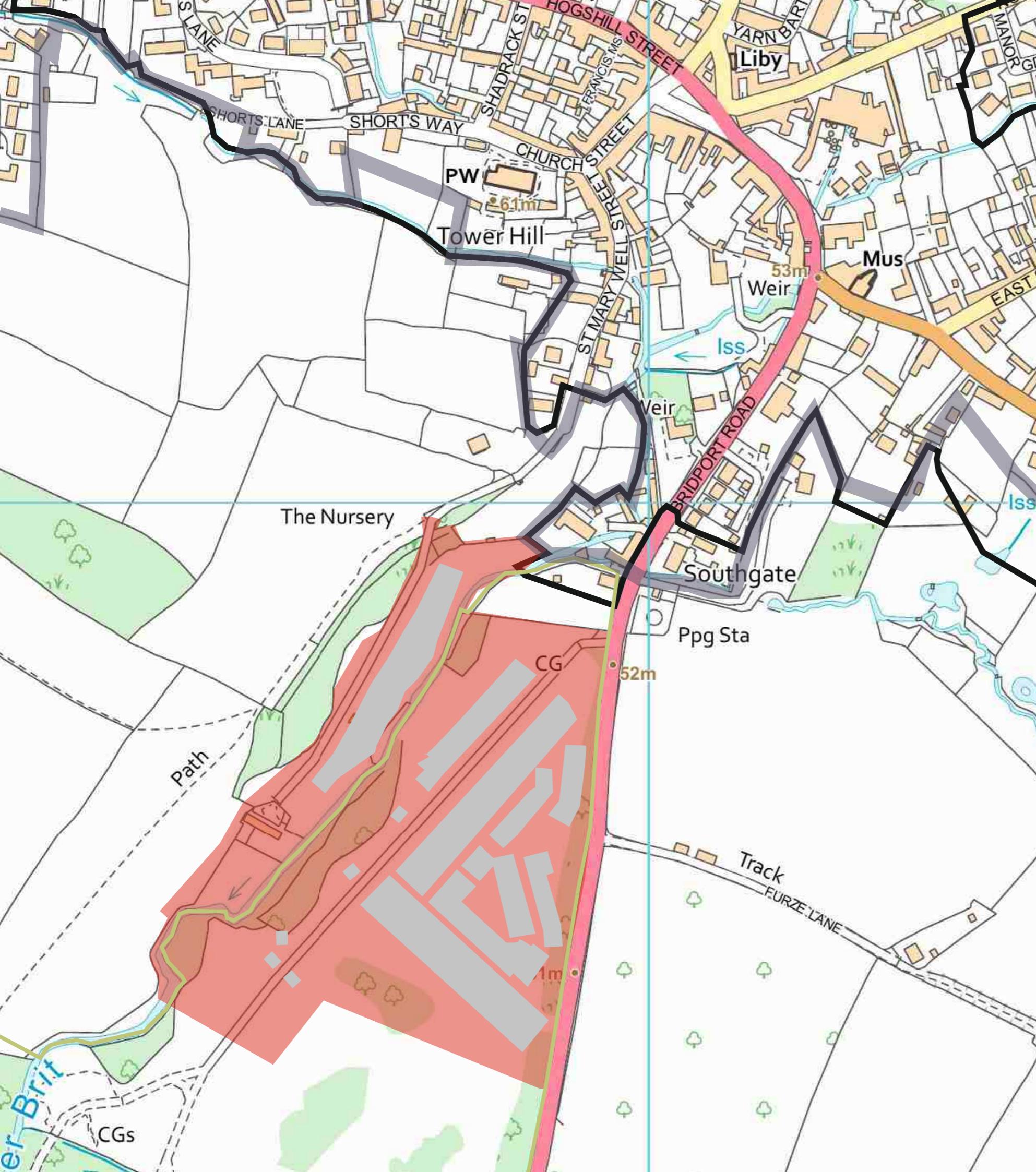
(Para 2.9) The applicant also has a strong vision for the development, conceiving it as a design-led community of high quality and sustainable residences, sensitively positioned alongside the deer park, woodland, riverside and listed parkland settings where owners will be able to enjoy the benefit of living within a beautiful and unique landscape.

(Para 2.10) Beaminster is the nearest settlement from which meaningful built context analysis can be taken to inform townscape decisions discussed later.....Beaminster's Conservation Area Appraisal describes the spatial character of the town as having a nucleated historic market place core with radial routes running along water courses, which have mostly been culverted through the town, and historic tracks.

Rural edges play a key part in defining the shape of the town, particularly to the South where the location of the Parish Church, set away from the core and surrounded on three sides by countryside, sets a precedent for green wedges bleeding into the settlement along the main accesses.

(Para 4.1) The applicant has a strong aspiration for this development. The design vision for the proposals is shaped by the desire to create a truly distinctive place and community, linked closely with the outstanding qualities and character of Parnham and with its attractive country and town surroundings. It comprises an extension to the built footprint of Beaminster and is connected with the town, but by reason of the location within the estate at Parnham and the extensive landscape framework of the site, it is also a parkland estate in its own right.

(Para 4.3) The site within the parkland to the East of the river has been conceived to have a character which addresses both the formality and grandeur of Parnham House, as well as nodding to the more organic and mixed nature of nearby Beaminster, enabling a strong sense of place to be created.....Formal street frontages take advantage of the existing tree-lined access drive which provides an impressive route through to the existing deer park (and ultimately on to Parnham House) and its retention and use as the main thoroughfare for the enabling development creates a strong formal axis to anchor and orient the development.



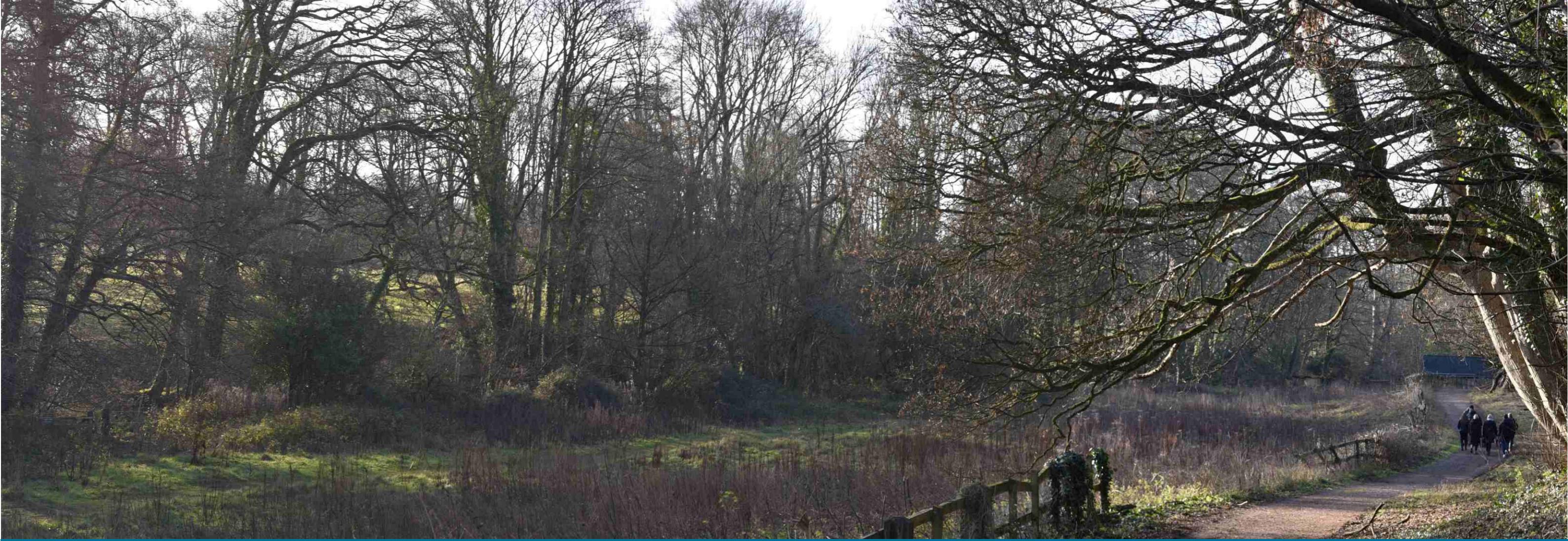
REVIEW OF THE APPLICANT'S DESIGN AND ACCESS STATEMENT cont.

(Para 4.7) The layout of the site has a strong sense of place, created from a detailed understanding of the site specific conditions and sensitive context, backed up by analysis of local context. Six character areas have been defined across the site, responding primarily to existing site features and also to the Parnham estate and local vernacular.

3 Landscape appraisal



View of River Brit Valley towards Hardy Way from bridleway W21/59 through Millground Meadow. The Enabling Development would be clearly visible and transform the nature of this view.



3.1 The following appraisal is based on desk study, a review of the planning submission documents and site visits undertaken in December 2025. Where possible, descriptions from source material have been summarised to avoid repetition.

3.2 View of Parnham parkland, River Brit Valley and route of the Hardy Way from the adjacent public right of way. The Enabling Development would be clearly visible and transform the nature of this view.

INTRODUCTION

3.3 The enabling works site falls within the National Character Area Profile 139 Marshwood and Powerstock Vales which covers a broad swath of land between the coast and Beaminster, extending almost to Lyme Regis in the west and the A356 to the east. The site and adjoining land falls within Local Character Area LCA Brit Valley as defined in West Dorset Landscape Character Assessment February 2009. The Dorset AONB Landscape Character Area also classifies the land as Brit Valley LCA. Detailed descriptions of these character areas are provided in the planning submission documents.

3.4 The photograph on page 4 of this report illustrates a panoramic view towards Beaminster from Mintern's Hill. The view highlights many of the landscape attributes which are valued across the AONB. It presents an immensely varied view towards the historic town with 'secret' valleys, wooded hills and a patchwork of enclosed pasture dotted with small scale settlement and farmsteads.

3.5 The Brit Valley character areas described in the published landscape character studies cover a wide tract of land along the course of the Brit Valley between Beaminster and Bridport. For the purpose of this report the local landscape means land which falls within the local setting of Parnham Estate between Beaminster and Netherbury, generally within 1.0km of the River Brit, as shown on the map on page 8.

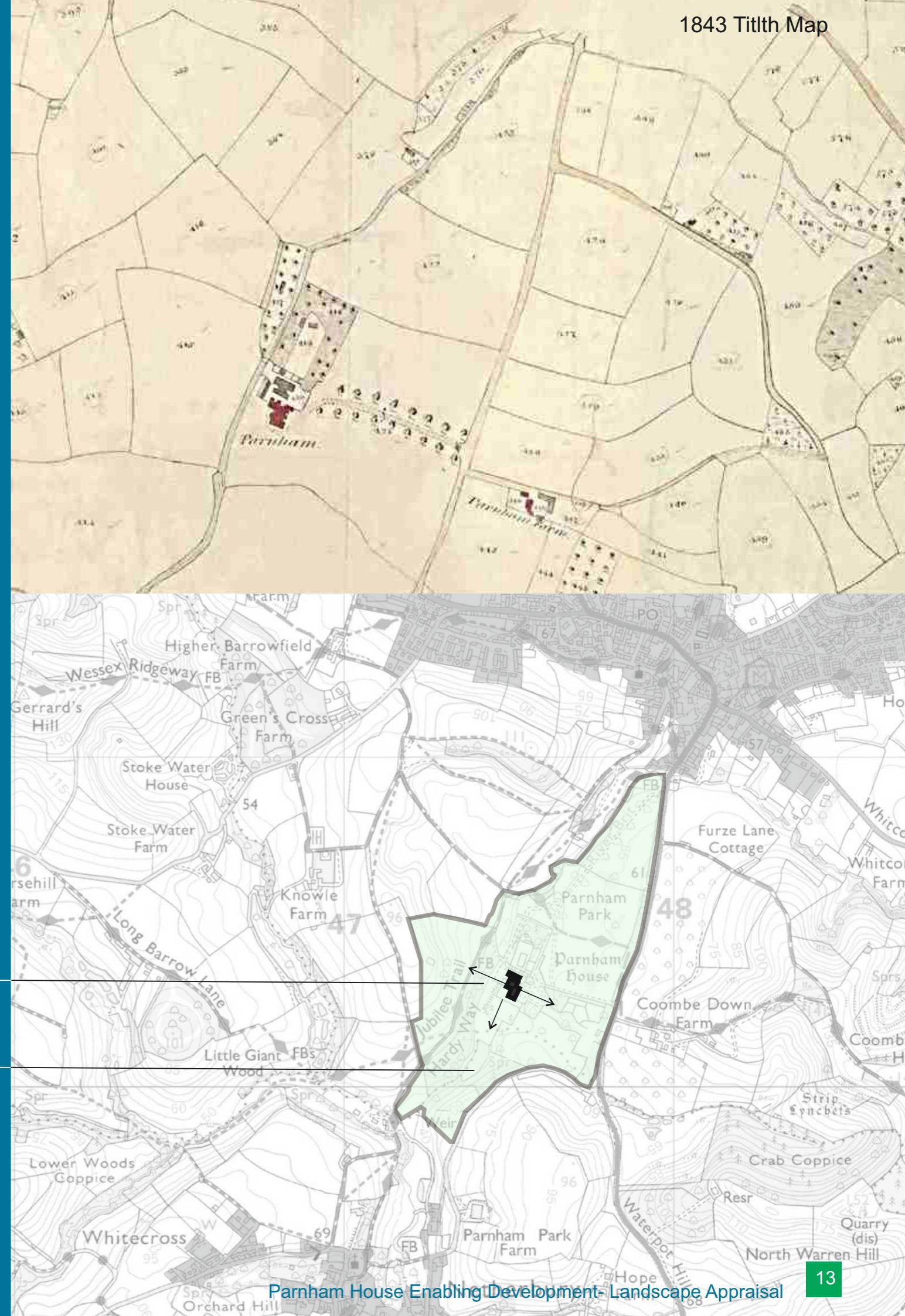
Parkland on the Parnham Estate forms a significant part of the immediate countryside setting of Beaminster Conservation Area and the town as a whole. The broad canopy of mature trees is clearly visible from the southern approach into the settlement. The parkland trees are visible from the A3066 route into town and also from numerous footpaths/bridleways which access the River Brit valley on the western edge of the estate. Part of the Conservation Area overlaps with the boundary of the Registered Park.

3.6

In many ways the local landscape might appear timeless but it isn't. Over the last few hundred years there have been significant changes, not least due to changes in the designed landscape on the Parnham Estate. At some period, Parnham House and the formal gardens may have appeared as a prominent feature in the landscape, visible from historic paths through the River Brit valley between Beaminster and Netherbury. This is no longer the case. In fact, the house, adjoining buildings and ornamental gardens are almost entirely screened from public view throughout the year by woodland and tree planting. The vegetation seems to have been deliberately positioned to screen the property. It is almost as if the owners and designers wanted to create a very private and discreet environment which wasn't overlooked and didn't detract from or dominate the natural beauty of the river valley landscape. The 'Picturesque' movement was fashionable during the C18th but the aesthetic continued to be appreciated throughout later periods which might also explain why the presence of such a large property was deliberately understated. Other design quirks seem to support this view. Interestingly, there is no grand gatehouse or ornate entrance to the property visible from public roads and the original drive from the east was uncharacteristically short for similar properties of this stature. The much longer drive through the parkland is a later feature constructed during the C19th. It is also notable that Parnham House is located in the central part of the estate, mid-way between Beaminster and Netherbury. The main elevation faces east with gardens to the north and south. The position and orientation of the property suggests that, at least initially, there was no intent to establish a clear relationship with either one of the local settlements.

Parnham House

Parnham House Registered Park and Garden



3.7

Purcell undertook a Historic Landscape Assessment of Parnham Park for the Applicant in June 2021. The following text has been extracted from the section dealing with the parkland in the northern part of the estate. This land forms a substantial part of the enabling site.

The north park was until the 1970s divided into three separate fields, identified historically as the 1st, 2nd and 3rd 'walks'. Since the removal of these former divisions, this area has acquired more of a parkland character. There are areas of woodland bordering the area, both on its western side along the River Brit and along the east boundary with the Bridport Road ...

Lear notes that in 1809 Sir William Oglander applied for a Footpath Diversion Order cutting short the public access to the park and diverting the footpath west of the river... Currently, a bridleway (BR56) crosses the North Park, between the Bridport Road and the footbridge over the River Brit, to the north of the Shrubbery – see photos NP04 and NP05. This route is in

regular use by walkers and horse riders. It replaced an earlier bridleway which until c.2001 passed between the stable block and the walled garden.

Although first impressions of this area suggest a traditional parkland attached to a country house, the north park is not a formally designed landscape as such. It was historically an agricultural landscape of open fields with scattered trees. Its use as the principal approach to Parnham House is a recent phenomenon. Visual connectedness to the mansion house is low due to screening of intervening trees, shrubbery etc..

The north park can be considered to be part of the setting of Parnham House, since it contributes to the sense of arrival at an ancient demesne – although this is not the historic approach to the house.



3.8

Beaminster was largely confined to the historic core of the town until around the 1970s. Following this period there was gradual expansion of housing to the north, east and west. The Beaminster Conservation Area Appraisal contains the following descriptions and recommendations;

...the plan of the historic core is nucleated in form, focused on a central market place, with radial route ways running along watercourses and historic tracks down from the northern escarpment and through the Powerstock Hills to The Square to form a star pattern.

The town has an impressive landscape setting, completely within the Dorset Area of Outstanding Natural Beauty (AONB): the southern approach by road or the Brit Valley Trail is enclosed by high limestone hills, including Gerrard's Hill (174m) and Coombe Down Hill, and by the ornamental grounds of Parnham House.

The existing boundary embraces the historic core and some of its immediate landscape setting. The whole area is included in the Dorset AONB and there are strong existing policies to ensure the safeguarding of landscape character. This should be sufficient to protect the features that are essential components of the Conservation Area. Other adjuncts, such as the Abbot Brown site on Fleet Street, should be improved as a result of the planning process.

The contribution of the landscape setting and trees to the conservation area to be perpetuated using all means possible

Mature avenue along the Drive through Parnham Park. See also view 15 in the ES Chapter 6



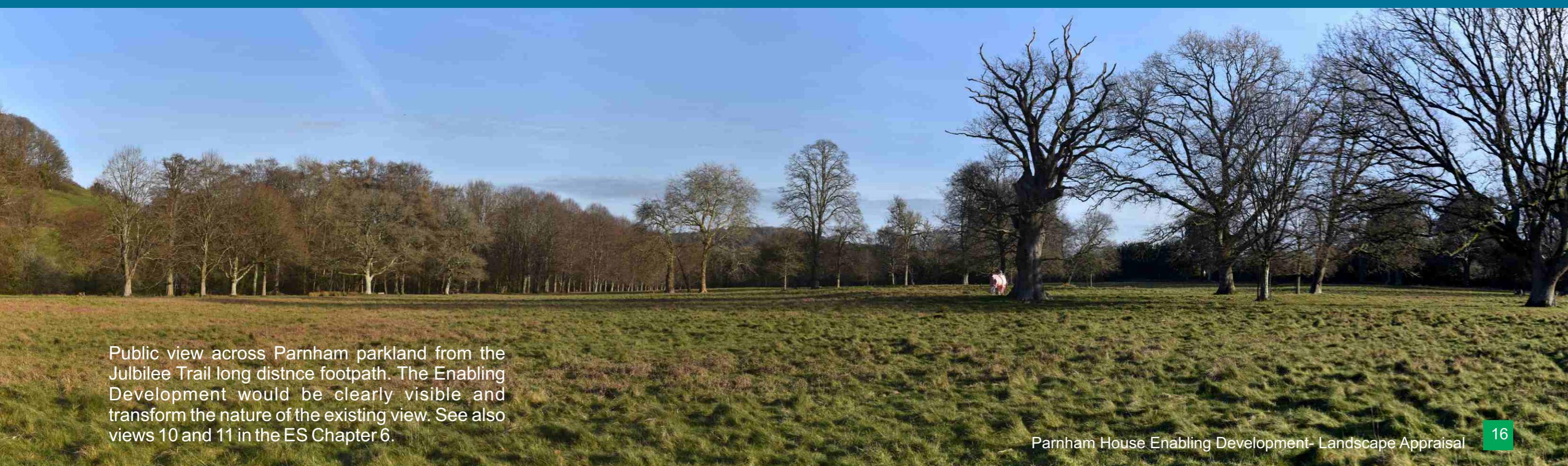
3.9 It is clear from analysis of recent growth in the town that development has mainly expanded along the minor valleys and farmland to the north and west. Allocated housing and employment land will continue the westward shift in the settlement boundary. Eastward expansion is somewhat restricted by Beaminster Manor Grade II Registered Park and Gardens but some infill development has occurred between the River Brit and the parkland. As a result of this development the only direct connection between the Conservation Area and the River Brit Valley is on the southern edge, where the boundary overlaps with Parnham Park. This remains the only visible connection between the River Brit valley landscape and the historic core of the town. It would be reasonable to conclude that this part of the setting (of the town and conservation area) has been safeguarded due to the designation of Parnham Park.

3.10 Other significant changes have also taken place in the local landscape since the mid-C18th. A review of historic OS maps confirms that the landscape has become more enclosed and wooded. Tree cover has increased across the Parnham Estate and also throughout the wider area. There has also been some alteration to the local field pattern due to changes in farming

practice and rationalization of farms. In some places fields have been combined or altered to form larger enclosures. Despite these changes and sometimes as a result of these, the River Brit valley retains a distinctly rural character, clearly located beyond the settlement boundary but not inaccessible or remote. The valley feels both intimate and expansive, depending on the nature of views but it is always distinctive and with a strong sense of place due to the meandering river corridor, parkland in the central part and views of hills and ridges beyond. Parnham House and the immediate gardens are almost entirely screened in public views and contribute little to the visual character, nevertheless, this part of the valley has qualities often associated with a picturesque landscape, exemplified by rolling pasture, bridges over a rushing river, flooded meadow, mature trees, old mill buildings and scattered farmsteads.

'The contribution of the landscape setting and trees to the conservation area to be perpetuated using all means possible'

Beaminster Conservation Area Appraisal



Public view across Parnham parkland from the Jubilee Trail long distance footpath. The Enabling Development would be clearly visible and transform the nature of the existing view. See also views 10 and 11 in the ES Chapter 6.

THE VALUE OF THE LOCAL LANDSCAPE

3.11

The landscape value and sensitivity of the enabling site and local landscape is undoubtedly high due to the AONB and the designation of the Registered Park and Garden (RPG) . This is clearly acknowledged in the ES and in other documents submitted with the planning application. There are, however, other aspects not fully acknowledged by the Applicant which elevate the value of this land. Some of these have been touched upon previously in this report but are summarised below for consistency. I have not highlighted the ecological value of the site - I am not a qualified expert and there is no detailed assessment provided in the Applicant's ES which would allow a considered analysis. The application does include a Biodiversity Assessment Gain Statement and other habitat information which is not the same as a detailed ecological assessment. It is noted that most woodland on the Parnham Estate and in the locality is a Dorset Priority Habitat.

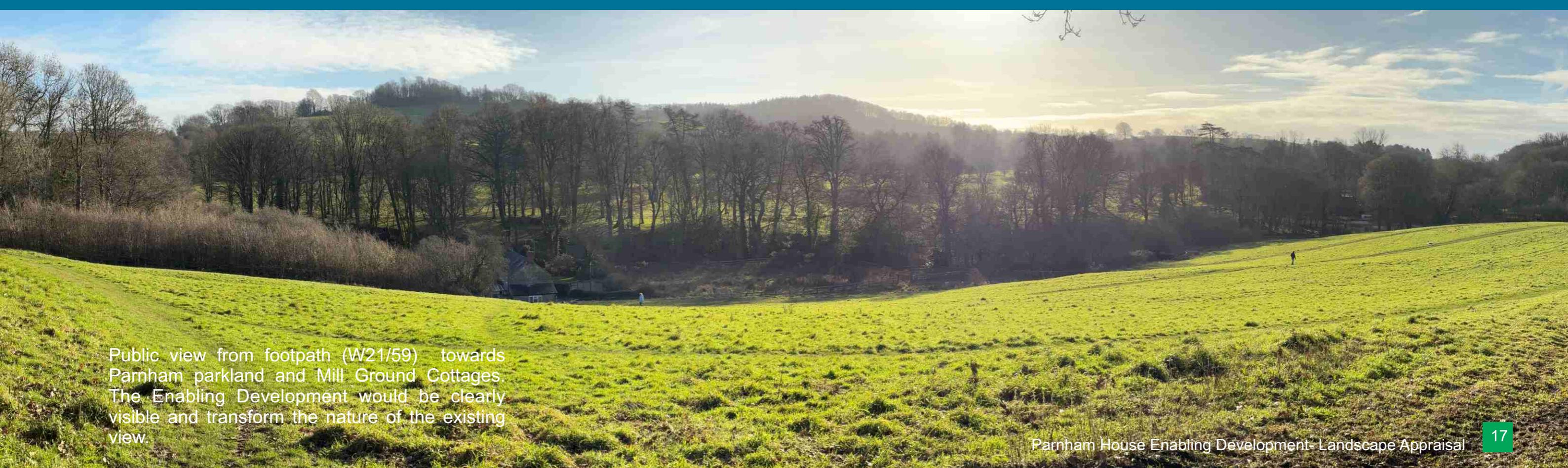
- The parkland at Parnham forms part of the setting and landscape context of the Conservation Area. It fulfills this function regardless of the extent of intervisibility between the designated areas. In any event, the two areas

do overlap which makes clear the obvious connection. The value of this relationship and that of the wider setting of the River Brit Valley landscape (to the significance of the Conservation Area) is elevated by the fact that other physical links between the river valley and the historic town have been lost or eroded by recent development. The Beaminster Conservation Area Appraisal recommends that the contribution of the landscape setting and trees to the conservation area should be perpetuated using all means possible. It is clear that this remaining part of the river valley setting has only been safeguarded due to the designation and integrity of the adjoining parkland landscape.

- This part of the River Brit valley landscape is highly accessible by horse riders and walkers of all abilities. The paths form part of traditional routes between Beaminster and Netherbury. Others are circular routes which pass through the river valley. From my site observations it is obvious these paths are well used throughout the year and winter views are as important as summer visibility. The photographs contained in this report clearly show that land on the designated parkland is visible in winter views and these views make a significant contribution to the amenity of walkers and riders using the footpaths/bridleways. Photographs on the following pages show a fraction of the walkers

using these rights of way over a 90 minute period during a site visit in December 2025.

- There are four long distance paths/promoted routes which converge at Beaminster and Parnham. These are illustrated on page 19 of this report. The Jubilee Trail crosses the parkland and offers direct open views across the enabling site. Three of the routes have close and/or filtered views across the development site for 6 months of the year when vegetation is not in leaf. The Hardy Way actually routes through part of enabling development site. The Wessex Ridgeway is the most distant path but it too offers potential views of the Enabling Development during the winter months. (See photomontage view 17 in the ES Chapter 6). All these routes are marketed through the Visit Dorset website to promote regional tourism.
- The Hardy Way takes the walker on a journey through Wessex and Dorset to celebrate the life and works of Thomas Hardy. The route was created by Margaret Marande and described in her book The Hardy Way - A 19th Century Pilgrimage. Thomas Hardy references Beaminster (Emminster) and the landscape around the town in several of his works, including Tess of The D'Urbervilles.



Public view from footpath (W21/59) towards Parnham parkland and Mill Ground Cottages. The Enabling Development would be clearly visible and transform the nature of the existing view.

Long distance footpaths to Beaminster and Parnham

HARDY WAY - a journey through the life and work of Thomas Hardy

BEAMINSTER (referred to as Emminster in Tess of the D'Urbervilles)

'In Tess, Emminster Vicarage is the home of the Reverend and Mrs Clare, Angel's parents. It is on the corner of a lane down to Saint Mary's Church from the main road. When Angel visits his parents to tell them about Tess he comes to the *hill surrounded little town, the Tudor church tower of red stone, the clump of trees near the vicarage....To him this is home....*'

Extract from The Hardy Way - A 19th Century Pilgrimage by Margaret Marande

Enabling Development site



Registered Park and Garden



Jubilee Trail



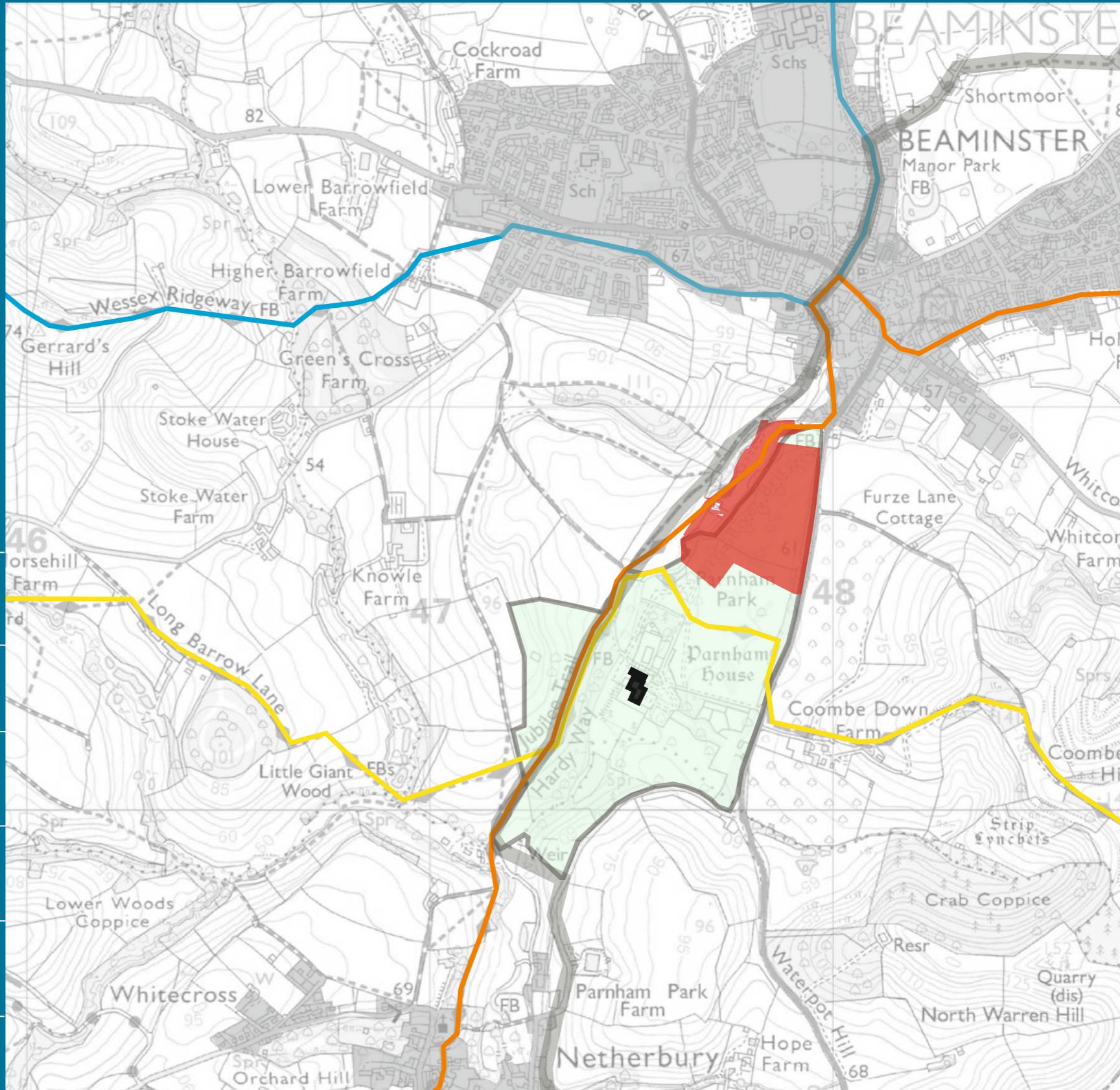
Hardy Way



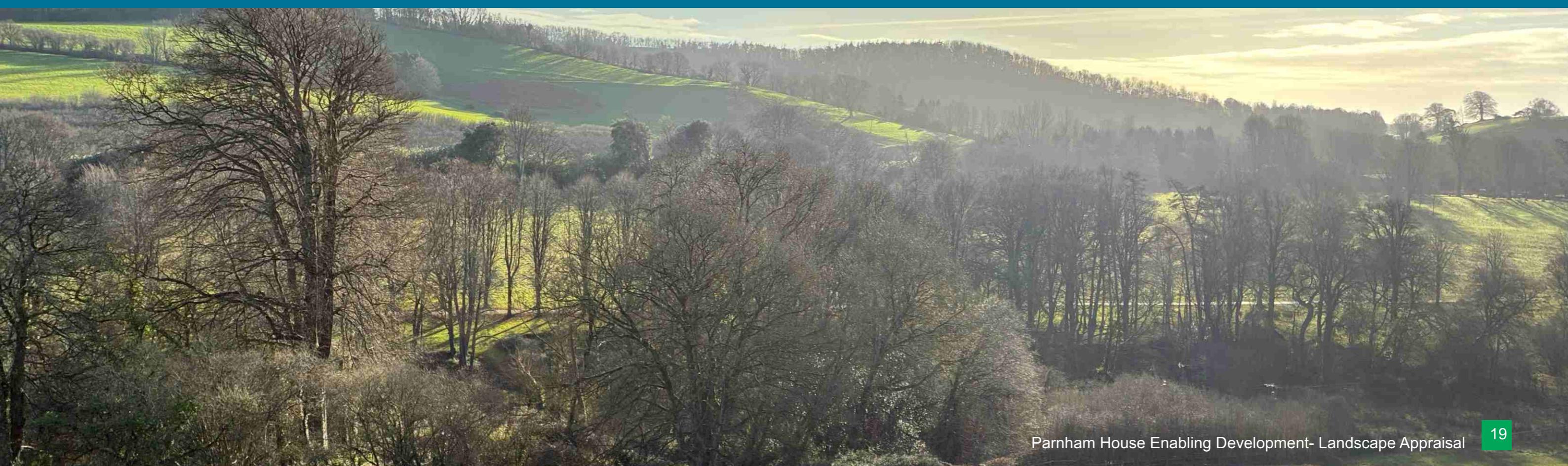
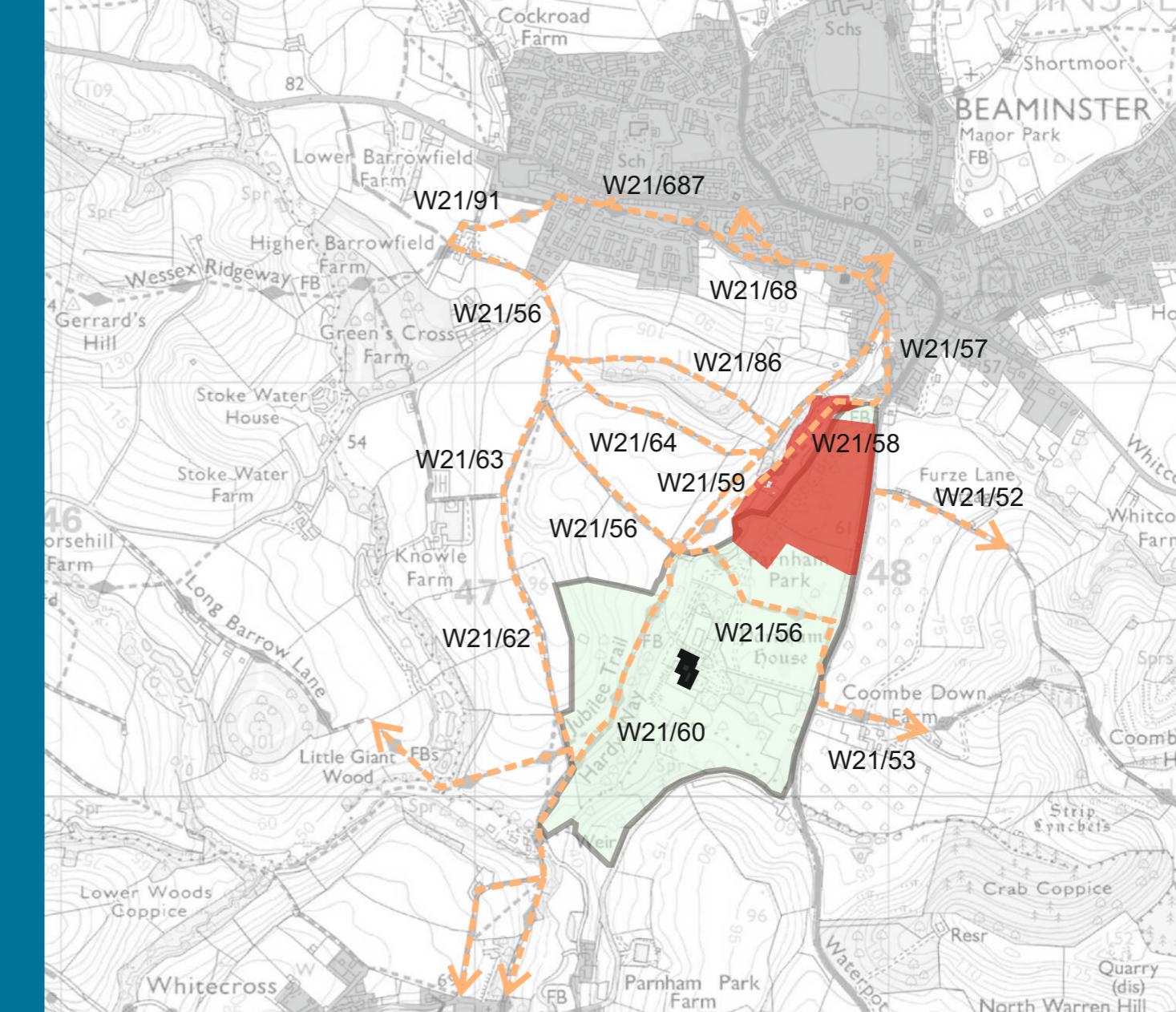
Wessex Ridgeway



Brit Valley Trail

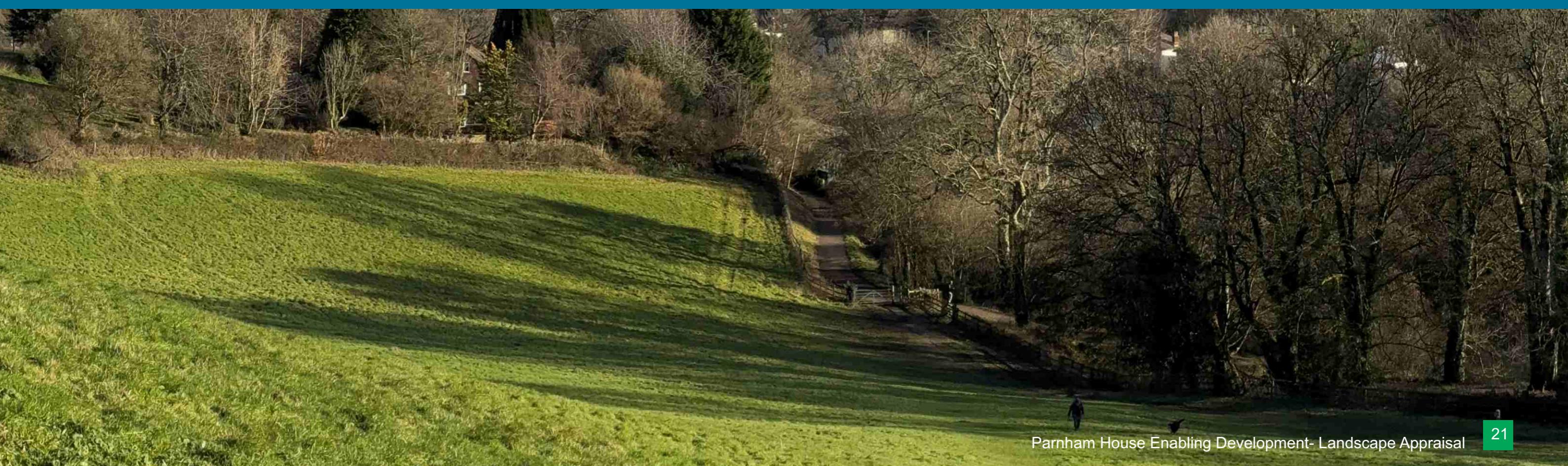


Numbered local public footpaths/bridleways linked to Parnham, Beaminster and the River Brit valley.



Photographs of walkers using public rights of way observed over a 90 minute period during a site visit in December, representing a fraction of total users.





THE LANDSCAPE AND VISUAL EFFECTS OF THE DEVELOPMENT

3.12 **The Applicant's ES concludes that the long term residual landscape effects on the enabling site and Parnham Park (Grade II Registered Park and Garden) would be substantial.** The ES assesses the impacts on the wider landscape character area and the AONB as moderate/ slight which would not normally be considered significant. In fact, this level of effect is within the range that would be expected for any development of this scale located in a larger geographical area. This limited assessment is not a useful indicator of potential landscape effects at a local level i.e. the local context, especially when such effects have the potential to alter the setting, value or appreciation of a place to the detriment of the wider AONB. It is for this reason that the approach taken in the ES is not regarded as good practice.

3.13 Table 6.11 in Chapter 6 in the ES identifies significant residual landscape and visual effects. The table identifies 11 views with significant effects (substantial or moderate) at year 15 – the long term visual effects. Of these, 8 views are public views available from public rights of way. This assessment is based on photography which doesn't show the full extent of visibility across the enabling site in good winter sunlight or indeed, views from every public right of way.

3.14 It is my professional opinion that the visual effects for an additional 5 views (views 3, 4 8, 9 and 17) should be regarded as significant. The effects are significant due to glimpsed views of housing development in the open countryside in a landscape which has multiple designations and clearly identifiable local value, including cultural connections with Thomas Hardy. These glimpsed views completely transform the perception of the landscape where development results in a significant incursion into the open countryside well beyond existing settlement limits. Notwithstanding any difference in professional opinion it is clear from my own site analysis and photography that there are many other views from local footpaths/bridleways which are not assessed in the ES. This would indicate there is a greater magnitude of effect on local receptors than identified by the Applicant. See photograph on page 23 of this report taken from bridleway W21/56 towards the enabling site.

3.15 As a result of the significant adverse visual effects from public footpaths/bridleways noted above, it is clear that potential changes in the local landscape are highly visible, especially in winter views (i.e. for 6 months of the year). These views will alter the perceived visual character of the local landscape to the detriment of local amenity and the appreciation of the natural beauty in this part of the AONB.

3.16 I note that Chapter 6 in the ES does not provide an assessment of potential visual effects on residents living in Mill Ground Cottages despite the planning officer previously highlighting Policy ENV16 - Amenity as being of relevance. This policy deals with adverse effects on the amenity of existing residents. Fieldwork and photography presented in the ES and in this report indicates that residents in this property would experience a significant change in view from gardens and north-east facing windows. This change in view would transform the outlook from this property and the adverse effects have the potential to meet the threshold of unacceptable impacts on residential amenity.

3.17 The following significant adverse landscape effects within the AONB will occur due to the proposed development. Not all these effects will occur due to a visible change in the landscape (views) or intervisibility between the various parts of the landscape. Landscape effects will occur due to a change in land use, changes in the landscape/settlement pattern, loss of existing landscape features and a change in views which significantly alters the visual character of the landscape. Effects on setting will occur due to a change in the local landscape which alters how a landscape is perceived and appreciated. As previously noted, there is no detailed assessment of changes in the setting of heritage assets in the ES.

- **Change in the landscape character of Parnham Park**
- **Change in the landscape character of parkland in Parnham Park**
- **Change in the landscape character of the River Brit Valley between Beaminster and Parnham House**
- **Change in the setting of Parnham House**
- **Change in the setting of Parnham Park Registered Park and Garden**
- **Change in the setting of Beaminster**



View east towards the enabling site and Parnham Registered Park and Garden from bridleway W21/56

OVERVIEW OF THE DESIGN PROPOSALS

3.18

The following general overview of the Enabling Development design proposals is provided to support my conclusions on potential landscape and visual effects.

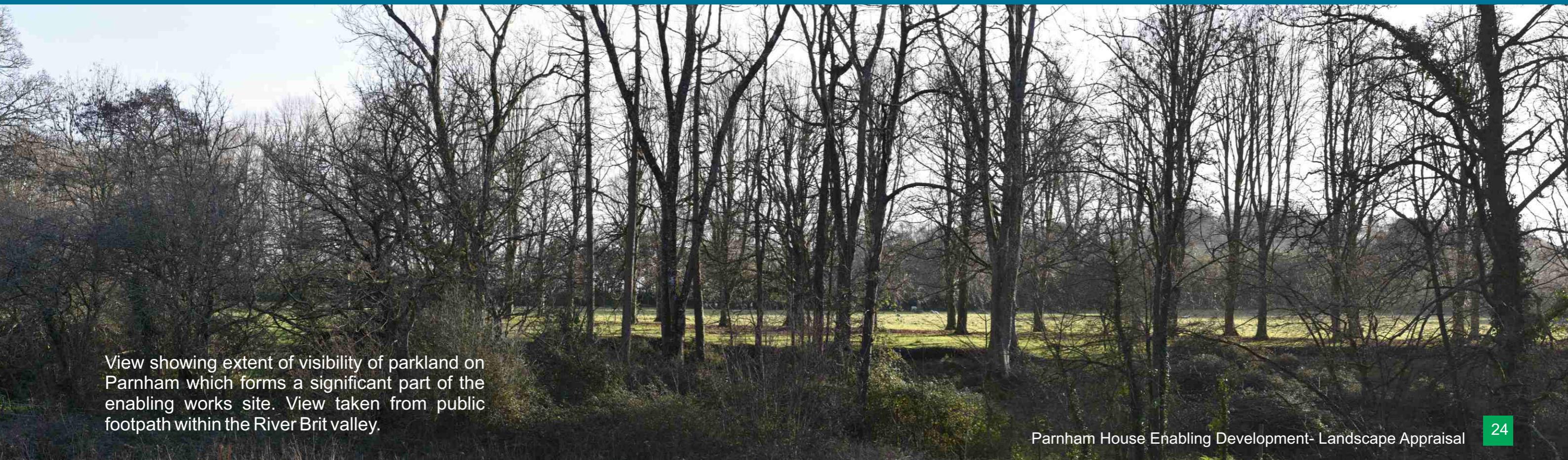
- Proposed development in the western part of the site is poorly related to Enabling Development on designated parkland due to the physical separation of the river corridor. Site constraints result in design solutions and layouts which are not consistent across the proposed site. Connectivity and access requires a new bridge crossing which contributes to adverse impacts and disturbance within the river valley.
- The western part of the development is poorly related to existing buildings on the edge of Beaminster. There is a distinct gap maintained between the Conservation Area and the development which would give the impression of physical separation while still being perceived as an extension of the town. The connection between old and new is not successfully expressed through the urban form or other linkages.
- Development in the western part of the site would urbanise the River Brit valley, alter the

setting of this part of the Conservation Area and RPG and erode the final connection between the natural valley landscape and the historic core of the town. There would be a loss of existing wildlife habitat.

- Urbanisation in this part of the River Brit valley would be clearly and significantly visible from several local footpaths and long distance routes, and also by residents living in Mill Ground Cottages. Public views would be available of the proposed houses and also rear garden areas, garden and bin storage, street lighting, infrastructure, local traffic and parked vehicles. Public access across this land would be retained but the amenity of these routes would be significantly diminished.
- Overshadowing of the proposed dwellings by surrounding vegetation may threaten the long term viability of mature trees which contribute to green infrastructure and local habitat.
- Most of the important heritage assets on the estate, including Parnham House, are completely hidden from public view and make no contribution to the visual character of the local landscape. Development in the RPG would be focused on the northern part of the parkland which, due to its designation, has safeguarded

the landscape setting of the Conservation Area and the landscape and amenity value of the River Brit valley which forms its immediate setting. This part of the Parnham Estate is the only area which is publicly accessible. The bridleway crossing the parkland is promoted as a long distance trail through Dorset and the AONB. Retention of the parkland therefore has considerable public benefit and, it could be argued, far more public benefit than other parts of the estate or indeed, any public benefit that could be derived from the Enabling Development.

- The transition between the development and retained parkland to the south is abrupt. The development edge is illustrated in photomontage views 10 and 11 in Chapter 6 of the ES. It comprises of two 'lodges' and a row of detached properties with roof space accommodation. The DAS confirms the lodges take design inspiration from historic pavilions at Montacute House in Somerset. Whatever the merits of this approach it is clear that the new urban edge would be prominent in views across the estate and of a scale which would suggest it is part of a much larger urban settlement. The lodges are statement buildings, for status and security - a 'keep out' device often associated with wealthy estates.



View showing extent of visibility of parkland on Parnham which forms a significant part of the enabling works site. View taken from public footpath within the River Brit valley.

- One of the principal features of the design is the three storey parade of houses along the route of the existing drive and the terraced properties which front the southern edge of the development. It is designed to be bold and impressive - a nod to 'the formality and grandeur of Parnham House' (Design and Access Statement). Whatever the design merits of these keynote features, inspiration is clearly taken from the imposing nature of Parnham House and other stately homes rather than design cues from the neighbouring settlement. This approach has, to a large extent, informed the overall layout and urban form of the enabling development. It results in a housing development, which to the casual observer resembles a gated community - a development which is separate and distinct from the adjoining town but also visually dominant within the countryside setting of the Parnham Estate which otherwise discreetly accommodates the historic buildings and formal gardens.
- In my view the design approach taken for the enabling development is rather confusing. The architecture takes inspiration from Parnham House, which is not visible in views and makes little contribution to the architectural character and settlement pattern of the adjacent town. Design cues are taken from Beaminster but the connections between the town and the Enabling Development are not well expressed through the architecture, street layout or urban form. It refers to the Poundbury development in Dorchester which is of a much larger scale and also refers to Montacute House in Somerset, an Elizabethan property located 10 miles distance which is not associated with this site.
- There is little clear relationship between the development layout and the geometric layout of Parnham House and its designed gardens. My own analysis of the landscape in Parnham Park indicates that the buildings and gardens were intended to be discreetly placed in the countryside with key features almost entirely screened from public view. It suggests that the many owners of Parnham desired a high degree of privacy or wanted to avoid overwhelming or distracting from the natural beauty of the wider landscape. There is no elaborate gateway or lodge at the road entrance and initially, before the current northern access drive was constructed, the short drive from the east was rather understated. The bold (highly visible) architectural forms presented by the Enabling Development seem to be the very antithesis of the design approach undertaken historically throughout the estate.
- The proposed development is located on what is described as the least sensitive part of the estate in terms of its contribution to the significance of the heritage assets. In doing so, it uses land on the estate which will ultimately, through development, reinforce the relationship between Parnham House and Beaminster in a way which I believe was never originally intended. Geographically, Parnham House sits midway between Beaminster and Netherbury with the main house orientated away from both settlements. The parkland to the north was a later addition, probably intended, among other things, to ensure continued separation between Beaminster and Parnham House as well as for aesthetic reasons. From that perspective the parkland has fulfilled a valuable function in maintaining the integrity of the estate and preventing the southern expansion of the town towards Parnham House along the river valley. The proposed enabling development will fundamentally alter the historic relationship between Parnham House and Beaminster in a manner which is difficult to reconcile through the current proposals.

4 The development, planning policy and guidance



Public view across Parnham parkland from the Jubilee Trail long distance footpath. The Enabling Development would be clearly visible and transform the nature of the existing view. See also views 10 and 11 in the ES Chapter 6.

THE DEVELOPMENT, PLANNING POLICY AND GUIDANCE

4.1 The development would be located predominantly on parkland which is judged by the Applicant to be less sensitive in heritage terms than other parts of the designated RPG. In landscape terms it does not have this distinction - it is no less sensitive than other parts of the estate due to its contribution to local landscape character and the River Brit valley, and its visibility from public rights of way/promoted long distance paths with strong cultural connections to Thomas Hardy. It is also the only remaining part of the River Brit Valley which has a direct connection to the Conservation Area and forms part of its immediate landscape setting which should be 'perpetuated using all means possible' (Beaminster Conservation Area Appraisal).

4.2 The western part of the enabling works site is equally sensitive in landscape terms. It is located within a minor valley separated from the designated parkland by the River Brit and enclosed by a small belt of woodland. The land has picturesque qualities in its own right due to views along the river, the natural landscape elements and the juxtaposition of Mill Ground Cottages. The land is accessed and visible in its entirety by several public rights of way and

promoted trails. These paths provide direct access to the adjacent Conservation Area. The ecological value of the River Brit valley enhances its landscape value.

4.3

The parkland is the most visible part of the Parnham and clearly visible from promoted long distance footpaths throughout the year. From some footpaths the parkland is the only part of the RPG visible in local public views. The entire site is visible from multiple public rights of way and long distance routes. Many views of the development from these paths are acknowledged by the ES as significant. It could be reasonably argued that even minor views from these paths create significant adverse impacts when visibility of development in the open countryside has the effect of creating a notable perceived shift in the settlement edge of Beaminster. This in turn alters the landscape context (setting) of the Conservation Area and the heritage assets at Parnham.

4.4

Fieldwork and photography presented in the ES and in this report indicates that residents in this property would experience a significant change in view from gardens and north-east facing windows. This change in view would transform the outlook from this property and the adverse effects have the potential to meet the threshold of unacceptable impacts on residential amenity.

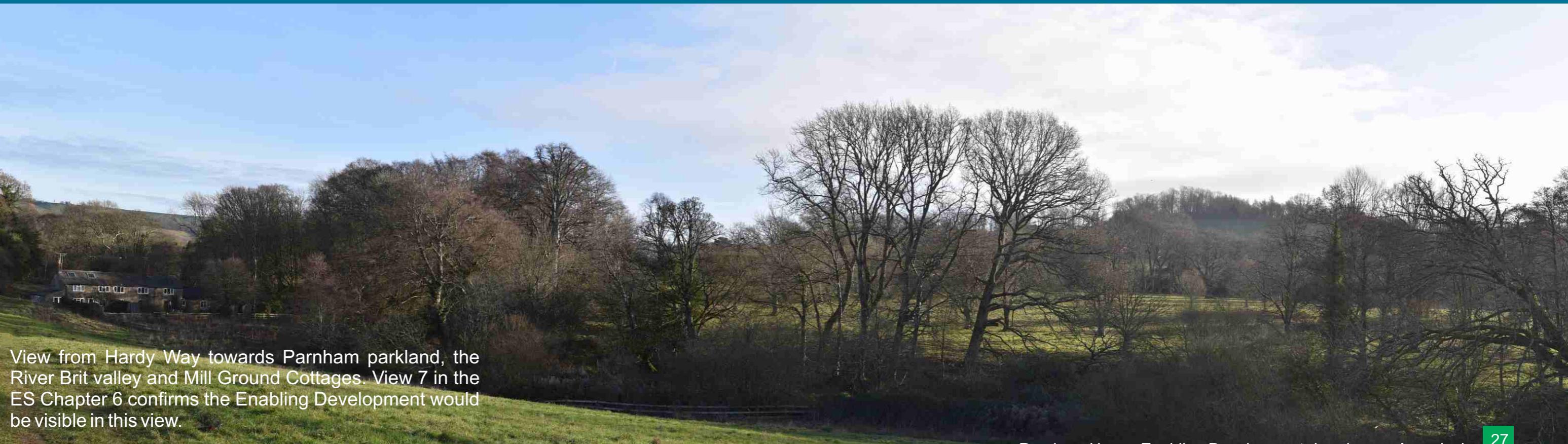
4.5

All these factors elevate the value, sensitivity and effects on this local landscape above that which could occur in other parts of the AONB.

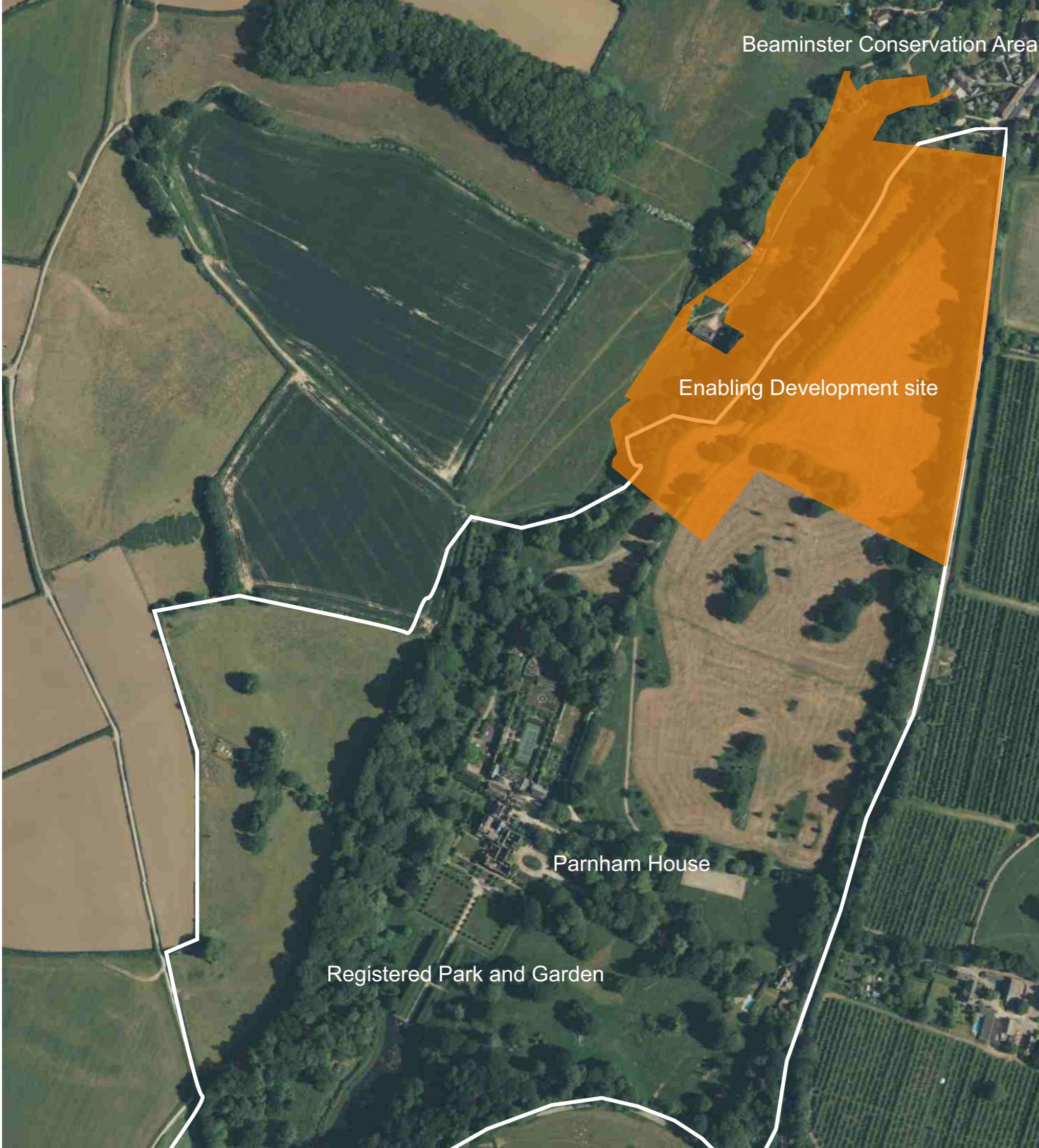
4.6

For these reasons and other matters raised in this statement I am of the opinion that the proposed development would be in conflict with the local policies listed below and NPPF paragraphs 189, 190, 208, 221.

- ENV1 - Landscape, seascapes and sites of geological interest
- ENV3 - Green infrastructure network
- ENV4 - Heritage assets
- ENV10 - The landscape and townscape setting
- ENV12 - The design and positioning of buildings
- ENV15 - Efficient and appropriate use of land
- ENV16 - Amenity



View from Hardy Way towards Parnham parkland, the River Brit valley and Mill Ground Cottages. View 7 in the ES Chapter 6 confirms the Enabling Development would be visible in this view.



4.7

Planning Note 4 - Enabling Development, makes clear that planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. The main public benefit of the proposals (noting the intended end use of Parnham House as a private dwelling or commercial operation) is the proposed gated public access through part of the estate which currently is only accessible when visiting the café during opening hours. This benefit needs to be weighed against the disbenefit of significant changes in the landscape and views from the bridleway through the estate and other public footpaths/bridleways in the wider landscape. Except for the route along the existing drive I note that the proposed development has low levels of public access and permeability (in contrast with the town in general) and the design proposals in effect create a gated community which would appear detached and distinct from the town. Conversely, the development is sufficiently close to the edge of Beaminster so as to appear as a major extension to the urban area abutting the Conservation Area. For these reasons I do not consider that the benefits of the proposal outweigh the disbenefits insofar as these relate to landscape and visual effects and local amenity. These disbenefits occur despite the mitigation measures incorporated into the design proposals and the fact the scheme represents the best solution currently put forward by the Applicant.

5 Conclusion



View from the edge of Edmund Coombe Coppice towards Parnham parkland. The Enabling Development would be clearly visible and transform the nature of the existing view.

CONCLUSION

5.1

The Planning Statement confirms that design changes were made to the Enabling Development following public feedback and comments from the Design Review Panel. The Planning Statement refers to discussions with the Planning Authority and Historic England since 2020 and also consultations with residents and Dorset Design Review Panel. It would be reasonable to assume therefore that the current scheme is considered by the Applicant to represent the best design solution for the Enabling Development, notwithstanding comments received from consultees and residents on matters which may not have addressed by the current scheme layout.

5.2

The enabling works site lies within a landscape of national importance and in a Registered Park and Garden forming part of the wider Parnham estate containing a Grade I Listed Building (Parnham House). However, the high sensitivity of the local landscape is more than simply a reflection of these designations, it also relates to the value of the local landscape in terms of its contribution to the setting of the heritage assets and the town, the inherent beauty of the Brit Valley landscape, the high amenity value of numerous footpaths and long distance paths and the cultural connections to Thomas Hardy.

5.3

In landscape terms, the sensitivity of the parkland which will accommodate the development, is no less sensitive than other parts of the Registered Park and Garden.

5.4

The parkland at Parnham forms part of the setting and landscape context of the Beaminster Conservation Area. It fulfills this function regardless of the extent of intervisibility between the designated areas. In any event, the two areas do overlap which makes clear the obvious connection. The value of this relationship and that of the wider setting of the River Brit Valley landscape (to the significance of the Conservation Area) is elevated by the fact that other physical links between the river valley and the historic town have been lost or eroded by recent development. The Beaminster Conservation Area Appraisal recommends that the contribution of the

landscape setting and trees to the conservation area **should be perpetuated using all means possible**. It is clear that this remaining part of the river valley setting has only been safeguarded due to the designation and integrity of the adjoining parkland landscape.

5.5

This part of the River Brit Valley landscape is highly accessible by walkers and riders of all abilities. The footpaths and bridleways form part of traditional routes between Beaminster and Netherbury. Others are circular routes which pass through the river valley. From my site observations it is obvious these paths are well used throughout the year and winter views are as important as summer visibility.

5.6

There are four long distance paths/promoted routes which converge at Beaminster and Parnham. The Jubilee Trail crosses the parkland and offers direct open views across the enabling site. Three of the routes have close and/or filtered views across the development site for 6 months of the year when vegetation is not in leaf. The Hardy Way actually routes through part of the enabling development site. The route takes the walker on a journey through Wessex and Dorset to celebrate the life and works of Thomas Hardy. The walk was created by Margaret Marande and described in her book *The Hardy Way - A 19th Century Pilgrimage*. Visit Dorset promotes the Hardy Way as a long distance walking trail visiting places associated with author and poet Thomas Hardy.

5.7

The Applicant's own ES concludes that the long term residual landscape effects on the enabling site and Parnham Park (Grade II Registered Park and Garden) would be substantial. I would agree with this assessment. The ES makes no assessment on the effects of the Enabling Development on the local landscape which falls within the wider local setting of River Brit valley or the setting of the heritage assets. My own appraisal concludes that the following significant adverse landscape effects within the AONB will occur due to the proposed development. Landscape effects will occur due to a change in land use, changes in the landscape/settlement pattern, loss of existing landscape features and a change in views which significantly alters the visual character of the

landscape. Effects on setting will occur due to a change in the local context as perceived in the wider landscape.

- Change in the landscape character of Parnham Park
- Change in the landscape character of parkland in Parnham Park
- Change in the landscape character of the River Brit Valley between Beaminster and Parnham House
- Change in the setting of Parnham House
- Change in the setting of Parnham Park Registered Park and Garden
- Change in the setting of Beaminster Conservation Area

5.8

Drawing on the assessment in the ES and my own site analysis it is clear that almost every local public footpath and bridleway with potential views of the Enabling Development will be significantly adversely affected due to the change in view and the length of path/bridleway affected. The bridleway through Parnham Park is significantly affected for almost the entire route through the designated RPG. Moreover, there are significant views of the Enabling Development from every long distance footpath which passes close to Parnham Park or through the town.

5.9

As a result of the significant adverse visual effects from public footpaths/bridleways it is clear that potential changes in the local landscape are highly visible, especially in winter views (i.e. for 6 months of the year). These views will alter the perceived visual character of the local landscape to the detriment of local amenity and the appreciation of the natural beauty in this part of the AONB.

5.10

The parkland is the most visible part of the Parnham and clearly visible from promoted long distance footpaths throughout the year. From some footpaths/bridleways the parkland is the only part of the RPG visible in local views. The entire site is visible from multiple rights of way and long distance routes. Many views of the development from these footpaths/bridleways are acknowledged by the ES as significant. It



View from public footpath (W21/64) towards parkland on the Parnham Estate and the Enabling Development. Reference to view 3 in the ES Chapter 6 indicates there is likely to be some visibility of the development from this location.

could be reasonably argued that even minor views from these paths create significant adverse impacts when visibility of development in the open countryside has the effect of creating a notable perceived shift in the settlement edge of Beaminster. This in turn alters the landscape context (setting) of the Conservation Area and the heritage assets at Parnham.

5.11 All the above factors elevate the value, sensitivity and adverse effects on this local landscape above that which could occur in other parts of the AONB.

5.12 For these reasons and other matters raised in this statement, my professional judgement is that the proposed development would be in conflict with the local policies listed below and NPPF paragraphs 189, 190, 208, 221.

- ENV1 - Landscape, seascapes and sites of geological interest
- ENV3 - Green infrastructure network
- ENV4 - Heritage assets
- ENV10 - The landscape and townscape setting
- ENV12 - The design and positioning of buildings
- ENV15 - Efficient and appropriate use of land
- ENV16 - Amenity

5.13 I do not consider that the benefits of the proposal outweigh the disbenefits insofar as these relate to landscape and visual effects and local amenity. These disbenefits occur despite the mitigation measures incorporated into the design proposals and the fact the scheme represents the best solution currently put forward by the Applicant.

Appendices

Appendix A . Local policy and guidance

The response to the Applicant from the planning officer dated 13 December 2024 refers to superceded layout Options A and B illustrated in the Design and Access Statement (November 2025) and earlier responses to the pre-application request. The officer's response dated 21 December 2022 lists relevant planning policies in the Adopted West Dorset and Weymouth & Portland Local Plan. It is reasonable to assume that these policies apply to the current proposals. Those which are relevant to this report are listed below.

- ENV1 - Landscape, seascapes and sites of geological interest
- ENV3 - Green infrastructure network
- ENV4 - Heritage assets
- ENV10 - The landscape and townscape setting
- ENV12 - The design and positioning of buildings
- ENV15 - Efficient and appropriate use of land
- ENV16 - Amenity

Policy ENV1 seeks to protect exceptional landscapes taking into account the objectives of the Dorset AONB Management Plan. Development which would harm the character, special qualities or natural beauty of the Dorset Area of Outstanding Beauty will not be permitted. **The policy states that Development should be located and designed so that it does not detract from and, where reasonable, enhances the local landscape character. Development that significantly adversely affects the character or visual quality of the local landscape or seascapes will not be permitted. The policy also requires appropriate measures to moderate the adverse effects of development on the landscape and seascapes.**

Among other things, **Policy ENV3** states that development that would cause harm to the green infrastructure network or undermine the reasons for an area's inclusion within the network will not be permitted unless clearly outweighed by other considerations. Paragraph 2.2.23 in the **Local Plan** refers to green infrastructure as a network of spaces and linkages that are generally valued for their wildlife, geological, landscape or historic importance and may also have recreational value and help reduce flood risk. Although often important in their own right, when considered as a holistic network they provide much greater benefits.

Among other things, **Policy ENV4** requires the impact of development on a designated or non-designated heritage asset **or its setting** must be thoroughly assessed against the significance of the asset.

Development should conserve and where appropriate enhance the significance.

ii) Applications affecting the significance of a heritage asset or its setting will be required to provide sufficient information to demonstrate how the proposals would positively contribute to the asset's conservation.

Policy ENV4 further states that Applications affecting the significance of a heritage asset **or its setting** will be required to provide sufficient information to demonstrate how the proposals would positively contribute to the asset's conservation.

Any harm to the significance of a designated or non-designated heritage asset must be justified. **Applications will be weighed against the public benefits of the proposal; if it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset, and; if the works proposed are the optimum required to secure the sustainable use of the asset.**

Paragraph 2.3.19 in the Local Plan states;

Historic parks and gardens are important both for their own intrinsic value, and for their contribution to the character of their surrounding landscapes, tourism, recreation and leisure. Parks and gardens of national significance are identified by Historic England and listed in its Register of Parks and Gardens of Special Historic Interest as either Grade I (international importance), Grade II* (exceptional historic interest), or Grade II (special historic interest).

Paragraph 2.3.21 in the Local Plan states;

The appearance or setting of a park or garden will be a material planning consideration in the determination of planning applications.

Policy ENV10 requires development to contribute positively to the maintenance and enhancement of local identity and distinctiveness. It states that development should be informed by the character of the site and its surroundings. **Policy ENV10** also requires Development to provide for the future retention and protection of trees and other features that contribute to an area's distinctive character. The

policy states that Development should only be permitted where it provides sufficient hard and soft landscaping to successfully integrate with the character of the site and its surrounding area. The policy further states that opportunities to incorporate features that would enhance local character, including public art, or that relate to the historical, ecological or geological interest of a site, should be taken where appropriate.

Policy ENV12 states that development will achieve a high quality of sustainable and inclusive design and will only be permitted where it respects the character of the surrounding area or would actively improve legibility or reinforce the sense of place. This means, among other things, that the general design of the area as a whole and should relate positively to adjoining buildings, routes, open areas, rivers, streams and other features that contribute to the character of the area.

Policy ENV15 states development should optimise the potential of the site and make efficient use of land, **subject to the limitations inherent in the site and impact on local character.**

Among other things **Policy ENV16** states development proposals will only be permitted provided they do not have significant effect on amenity through overbearing impact.

Chapter 14 in the Local Plan sets out the vision for Beaminster

Paragraph 14.1.2 states;

The historic routes and plot patterns radiate out from the small market square, and these, together with the local building materials, exert a strong influence over the character of the town.

Paragraph 14.2.1 states;

In 2031 Beaminster will retain its attractive historic character and respect the beauty of the surrounding countryside whilst developing on a small scale, primarily to meet local needs for housing, employment and community facilities;

Appendix B. National planning policy and guidance

The following paragraphs in NPPF (December 2024, updated February 2025) are considered relevant to this development and the scope of this report.

Para 189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Para 190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a)the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b)the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c)any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Para 208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (**including by development affecting the setting of a heritage asset**) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para 213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

- a)grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b)assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Para 221. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Annex 2: Glossary

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Planning Note 4. Enabling Development and Heritage Assets. Historic England

The following summary paragraphs have been extracted from Planning Note 4.

Para 19. As stated in paragraph 202 of the NPPF, (para 221 in NPPF December 2024) local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. Clearly there could be a tipping point at which the harm to the heritage asset's significance is so great as to make the exercise of securing its future self-defeating. It might then be better to accept the risk of further decay or loss until circumstances change.

Para 20. Even when it is clear that enabling development is the only way to secure the future conservation of the heritage asset, a decision-maker will still need to assess whether the heritage and any other public benefits it would secure would outweigh the disbenefits of departing

from planning policy (NPPF, paragraph 221). Considerations in that assessment will include the importance and significance of the heritage asset(s), the nature of the planning policies that would be breached, the severity of the breach or breaches, whether the asset(s) have been subject to deliberate neglect and giving great weight to the asset's conservation.

Planning Note 3 (Second edition). The Setting of Heritage Assets. Historic England

The following text has been extracted and summarized from Planning Note 3.

The setting of a historic park or garden may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary. It can include:

- land which is not part of the park or garden but which is associated with it by being adjacent and visible from it
- land which is not part of the site but which is adjacent and associated with it because it makes an important contribution to the historic character of the site in some other way than by being visible from it, and
- land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association
- Views which contribute more to understanding the significance of a heritage asset include
- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- those where town- or village-scape reveals views with unplanned or unintended beauty
- those with historical associations, including viewing points and the topography of battlefields
- those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
- those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant

The Dorset AONB Management Plan covers the period 2019-2024 but the broad vision and strategies set out in this document are likely to remain cornerstone objectives in future iterations.

The following summary descriptions have been extracted from the Dorset AONB Management Plan.

Introduction

The Dorset AONB is a landscape of national and international significance for its natural and cultural heritage assets. It is a landscape rich in natural beauty which has been shaped by millennia of human occupation. Natural beauty and landscape quality goes beyond the look of the landscape: it includes the elements which comprise the view (topography, geology, hydrology, wildlife, archaeology and other built heritage and the cultural heritage made in response to it).

Areas of Outstanding Natural Beauty

AONBs are defined as areas not in a National Park but considered to be of such outstanding natural beauty that it is desirable to protect them. Government has confirmed that the landscape qualities of National Parks and AONBs are equivalent and current guidance makes it clear that the practical application of the natural beauty criterion is identical for both National Parks and AONBs, as is their equivalent importance and protection.

Purposes and duties: the legal basis

AONBs are designated under the National Parks and Access to the Countryside (NPAC) Act 1949. The purposes of the AONB designation were updated and confirmed by the Countryside Commission in 1991 as follows:

- The primary purpose of the designation is to conserve and enhance natural beauty
- In pursuing the primary purpose, account should be taken of the needs of agriculture, forestry, other rural industries and the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.

- Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.

The Countryside and Rights of Way Act 2000 confirmed the significance of AONBs and created improved arrangements for their management. There are three key sections of the Act for AONBs:

- Section 85 places a statutory duty on all 'relevant authorities' to have regard to the purpose of conserving and enhancing natural beauty when discharging any function affecting land in AONBs.
- Section 89 places a statutory duty on local planning authorities to act jointly to produce a Management Plan for each AONB in their administrative area.
- Section 90 describes the notification required during the AONB Management Plan-making process.

Landscape approach

Conservation and enhancement of the character and quality of the AONB landscape lie at the heart of all the chapters in this Management Plan. There are four landscape management strategies that can be used;

- **Conserve** - for landscapes in good condition with strong character where the emphasis is on protecting the key characteristics of the area.
- **Enhance** - for landscapes where some features have fallen into decline. Management should aim to reintroduce features, improve their management and remove features that detract from the overall character.
- **Restore** - for landscapes where features have been lost or are in a severe state of decline. Management should aim to repair and re-establish characteristic features.
- **Create** - for landscapes where condition is poor and character weak beyond repair. Management should consider creation of a new landscape. In taking forward these approaches, AONB management tends to focus on large or 'landscape scale' initiatives rather than small sites. Initiatives also tend to be integrated to include many different interests.

Statement of significance

AONBs are designated for their outstanding natural beauty. Natural beauty goes beyond the visual appearance of the landscape, including flora, fauna, geological and physiographical features, manmade, historic and cultural associations and our sensory perceptions of it. The combination of these factors in each area gives a unique sense of place and helps underpin our quality of life. The natural beauty of this AONB is described in a suite of special qualities that together make it unique and outstanding, underpinning its designation as a nationally important protected landscape. These are the elements we need to conserve and enhance for the future and they should be considered in all decisions affecting the AONB. This Statement of Significance is based on the 1993 Assessment of the Dorset AONB produced by the Countryside Commission.

Landscape character

Running throughout each character area are qualities that make the AONB inspiring and special, such as the sense of tranquillity and remoteness and sweeping views across diverse landscapes. The variety of landscape types found within the area is a defining feature of the AONB underpinned by diverse geology, with dramatic changes from high chalk and greensand ridges to low undulating vales or open heaths. It is often the transition from one landscape type to another that creates drama and scenic quality. At the local level, individual landmark features and boundaries add to character.

Parnham House - Enabling Development

Landscape appraisal
for Dorset Natural Heritage Initiative
January 2026

Stephen Laws
BA(Hons) Dip LA CMLI
Chartered landscape architect

Report C – Heritage and Architectural Appraisal

**Parnham House - Enabling Development Applications
P/LBC/2025/07037 and P/P/FUL/2025/06865**

**Heritage and Architectural Appraisal
for Dorset Natural Heritage Initiative
January 2025**



Fig.1 Aquatint of 1857 View of south front of Parnham House from fields by a bend in the river with cattle standing in the fields © Beaminster Museum.

Appraisal of Heritage and Architectural aspects of the erection of 82 houses and two visitor accommodation lodges in Parnham Park and Conservation and Restoration works to the fire damaged south wing of Parnham House.

kim sankey | architect

architecture | design | interiors

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Executive Summary

1. This appraisal has been prepared for Dorset Natural Heritage Initiative to examine the heritage and architectural aspects of a dual application for planning permission and listed building consent reference P/FUL/2025/06865 P/LBC/2025/07037 in respect of Parnham House and Park.
2. This appraisal sets out the policies which apply to the Applicant's proposals against which these must be tested and assessed.
3. In the introduction the significance and context of the Beaminster Conservation Area and its setting is described; the Registered Park & Garden (RPG) and its setting and the Context of Parnham House and other heritage assets on the site.
4. The subsequent analysis of context under sections 2.0, 3.0 and 4.0 are all vital to considering potential impacts (NPPF Para 214) and weighing in the balance public benefits against harm. This shall also recognise that the partial and potential conservation of Parnham House must not only be assessed in relation to other non-heritage harms (failure to deliver for local housing need; ecological impact; burden to over-stressed existing infrastructure and amenities) but also in terms of the failure to preserve and enhance Beaminster Conservation Area and the substantial harm to the Grade II* RPG which forms part of its setting.
5. This appraisal quantifies the impacts on the proposed 82 houses and 2 visitor accommodation lodges on Beaminster Conservation Area and deals with elements relating to the 'creative reimagining' of Parnham House itself.
6. A review of the drawings and documents finds them to be lacking in detail, inaccurate, inconsistent and devoid of any reference to local distinctiveness as required by Local Plan policies, national Future Homes Standards and the official Homes England design toolkit.
7. The considerable lack of adherence to, and cumulative negative impacts from non-compliance with Local Plan Policies ENV1, ENV2, ENV3, ENV4, ENV5, ENV10, ENV12, ENV15 and ENV16 and Historic England's Conservation Principles is also demonstrated.
8. The proposed development fails to respect the existing landscape settings of Parnham House, Beaminster Conservation Area and promotes an alien and suburban response to the context, not only of the RPG, but the Brit Valley. It would result in adversely impacting fine views, the cherished local scene, and the tranquillity of the undeveloped character of the green space.
9. The proposed Enabling Development (as required by NPPF Para 221) does not deliver any benefits, "*which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing those policies*". The 'restoration' is unclear and of dubious merit and unlikely to serve the purpose of saving the heritage asset while delivering any public benefit.

10. The proposed enabling development is not a sensitive response to the area, the RPG or Parnham House; it is not sustainable; its does not attempt to appreciate locally distinctive references and materials and promotes an incongruous typology.

11. The proposals lack any sensitivity to the context especially the proximity to Millground Cottages and meadow through which a public footpath has existed since at least 1809. The introduction of new development on both sides of the river Brit would be hugely disruptive of the riparian habitat.

Purpose of this Report

The aim is to summarise and ascertain whether the proposals align with Conservation Principles – Policies and Guidance for the Sustainable Management of the Historic Environment, BS: 7913 Conservation of Historic Buildings, the requirements of Chapter 16 of the National Planning Policy Framework and the policies of the West Dorset, Weymouth & Portland Local Plan 2015.

1.0 Introduction

1.1 This report is prepared in objection to the Applications for Planning Permission and Listed Building Consent. It provides information in relation to several high status listed buildings on Parnham Estate, Grade II* listed Registered Park and Garden, Beaminster Conservation Area and Dorset National Landscape. It addresses national and local planning policy in respect of the implications of development proposals on the significance of these designated heritage assets and one non-designated heritage asset South Lodge (former toll house) which is partially within the Conservation Area but the whole is within the Grade II* listed Registered Park and Garden.

1.2 Essentially the findings of the report demonstrate the failure of the proposals to comply with the Historic England definition of Conservation which is "*the process of maintaining and managing change to an heritage asset in a way that sustains and where appropriate enhances significance*".

1.3 The proposed development does not respond to the setting of Parnham House Grade I listed building in its Grade II* Registered Park & Garden. Furthermore, it has not taken sufficient reference from the morphology of Beaminster or the character of the Conservation Area. The setting being all the land from which the heritage assets can be experienced is including private and public land. This setting is a contributor to the overall significance of these three heritage assets.

1.4 The proposed development is located as far from the stately home as possible resulting in a visual and physical barrier between the house and its landscape and by its close proximity to Southgate, the creation of a suburban extension to the town. This impacts detrimentally on the setting of the Conservation Area and constitutes substantial harm which is only applied where the harm is wholly exceptional to high status assets.

1.5 This report has been prepared for Dorset National Heritage Initiative and represents their views in response to both applications P/2025/FUL/06865 and P/2025/LBC/07037 in relation to the impact of enabling development and conservation and restoration works on heritage assets.

2.0 The Significance of Beaminster Conservation Area and its Setting

2.1 Beaminster is essentially a nucleated settlement pattern with radial routes extending from the uninterrupted streets of buildings around the triangular historic market square and the Parish Church to the surrounding countryside. The Conservation Area Appraisal (CAA), adopted in January 2007, provides a brief overview of the features which contribute to the character and appearance and thereby

the significance of the Conservation Area. The document includes specific reference to the Registered Park and Garden at page 29 of the CAA. However, it is clear that the significance of the sub area 'a' of the Conservation Area derives from a number of additional elements, including its setting at the southern approach into the settlement, importantly the contribution of buildings in defining spaces and providing landmarks along the Bridport Road approach to the Square, which is the physical and spatial focus of the town. At Southgate is situated one of the entrances to the Grade II* Registered Park and Garden of Parnham House.

2.2 The CAA describes sub area 'a' building uses and types, the key Listed Buildings and the contribution made by non-designated heritage assets, building materials and details, and "green" elements. Significance also derives from the association with historic uses of existing mills along the river Brit which provides an ongoing connection with recreation activity, fine views into and out of the Conservation Area and towards surrounding countryside. Trees and gardens play an important role in providing contrast and interest. The high number of Tree Preservation Orders underlines the importance of trees to the character and enjoyment of the Conservation Area.

2.3 Trees are also a distinctive feature of the setting of the Conservation Area which contribute to its significance and the CAA identifies that they make a significant contribution to the enjoyment of the setting of Beaminster Conservation Area. When viewed from both sides of the river, the trees around the river corridor, together with the woodland of Edmund Coombe Coppice, a Site of Nature Conservation Interest on higher ground to the west, above Millground Meadow is an established element of the landscape.

3.0 The Significance of the Registered Park and Garden and its Setting

3.1 The proposed enabling development would be outside the defined development boundary of Beaminster and harmful to the Brit Valley Character Area of the Dorset National Landscape and to many high status heritage assets.

3.2 The Applicant acquired the Parnham Estate in 2020, after the fire in 2017 which destroyed the House and Stable Block, Workshop and Offices. The first pre-application enquiry response of 21 December 2022 reference P/PAP/2022/00710 proposed a farmstead concept in the NW of the RPG based on a potential design precedent of model farms and estate villages, developing as far north as possible with a landscape buffer in between the houses and the remainder of the park.

Part of this submission included Purcell's Landscape Assessment of 2021 which identified the North Park and North Avenue as having high heritage significance whilst noting (inaccurately) that visibility to the areas outside the park are limited by boundary planting. More precisely, because of the relative levels, intervisibility is unlimited, especially in winter. The Purcell report notes that the proposals should be "landscape led."

3.3 Immediately to the north of the formal entrance into the RPG is the non-designated heritage asset (South Lodge), abutting the site, at a lower level, yet sharing the same landscape setting (within the Grade II* RPG) and also occupying the

southern boundary of the sub area 'a' part of the Conservation Area, and as such it has full inter-visibility with the site. It has **evidential, historical and aesthetic value**. Its setting in the wider context contributes to its significance and any development immediately to the southern boundary of South Lodge would compromise that connection. The quiet and tranquil setting of the RPG will be disturbed by development in the northern part of the RPG, the inter-visibility of the proposed buildings across the site, and by the introduction of vehicles, movement and noise generation.

4.0 The Context of Parnham House, Stable Block, Workshop and Offices and their Setting

4.1 The condition of the south wing of the House has continued to deteriorate without scaffolding or a temporary roof covering. Dorset Council's second pre-app response dated 13 December 2024 reference P/PAP/2024/00641 includes a statement from the Applicant's Consulting Engineers, Mann Williams, which concludes that "the building is critically endangered... close to collapse... reaching a point of no return. Doubts it will survive another winter."

4.2 The building is identified on the Historic England Buildings at Risk Register as category priority 'A' in Part iv of the Executive Summary of the D&AS on page 3. The extract from the Buildings at Risk Register 2025 is set out below:

Site Details

Designated Site Name: Parnham House

Heritage Category: Listed Building grade I

List Entry Number: 1221178

Local Planning Authority: Dorset (UA)

Site Type: Domestic > Country house

Assessment Information

Assessment Type: Building or structure

Condition: Very bad

Vulnerability: High

Trend: Declining

Priority: A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed

Ownership: Private

*Designation: Listed Building grade I, RPG grade II**

4.3 Royal Commission on Historical Monuments, England published 1952.

The list entry for Parnham appears on page 21 of Dorset Volume I - West of this survey and inventory of the monuments in the county together with the ground floor plan at page 22 see Figure 2. This is the most detailed description of the House which underpins the architectural or historic interest of the Parnham, although there are no heritage values attached to the list description which should be considered in the Heritage Statement, in terms of evidential, historical, illustrative, associative, aesthetic, communal, social or spiritual values. Together with the photographic archive in the National Monument Record in Swindon and the original Historic Building Inspector's handwritten notes these remain the definitive record of the interior and exterior.

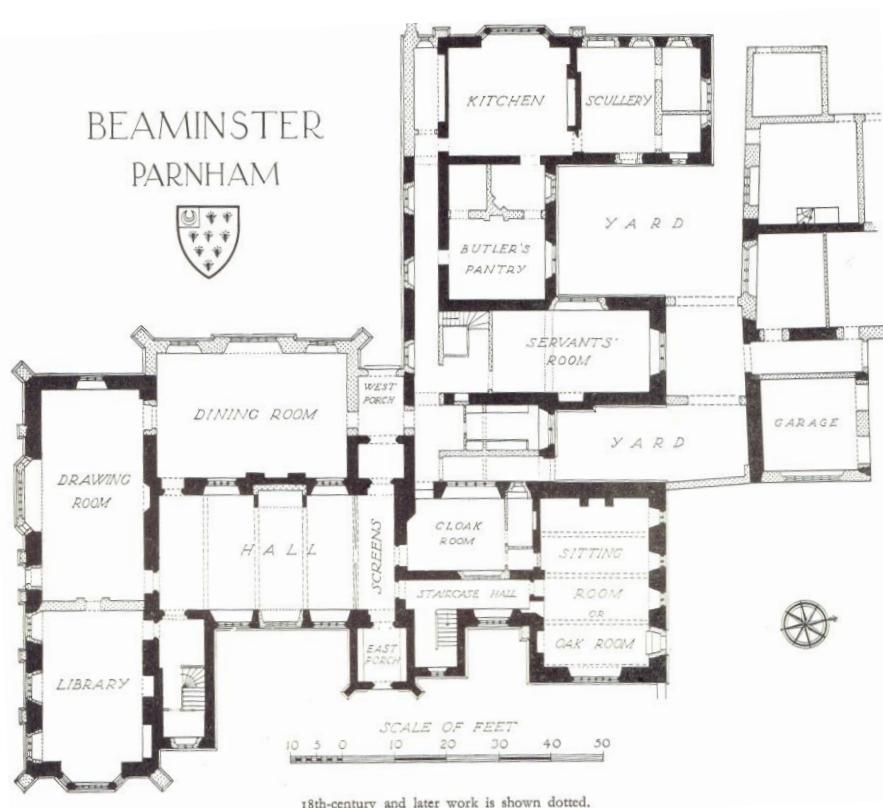


Fig.2 Ground Floor Plan of Parnham House c.1952 with the remodelling by Nash identified © RCHM.



Fig.3 Sales Particulars dated 1955 with 3 avenues of trees, through the park, off Bridport Road and to the Airmen's Grave to the west.

4.4 The House and its estate buildings in its picturesque landscape setting nestle in a wooded valley remote and isolated from either settlement of Beaminster or Netherbury with its original tree lined access from Bridport Road see Figure 3 - Sales particulars dated 1955. The house is orientated east west with the service areas to the north of stables and kitchen garden. This suggests that Parnham and its formal gardens were never designed to be seen, although it can be seen from higher ground as part of wider landscape. The nearest building is Coombe Down Farm with which there is no intervisibility. Parnham Mill at Millground probably existed until at least 1806 but does not appear on the Tithe Map of 1843 (see Figure 4) although the ruins of the leat and masonry can be seen on the river bank below Millground Cottages. The built archaeology of the remnants of the ice house, mill house and leat all contribute to the understanding of the significance of the House and remain important to its setting.

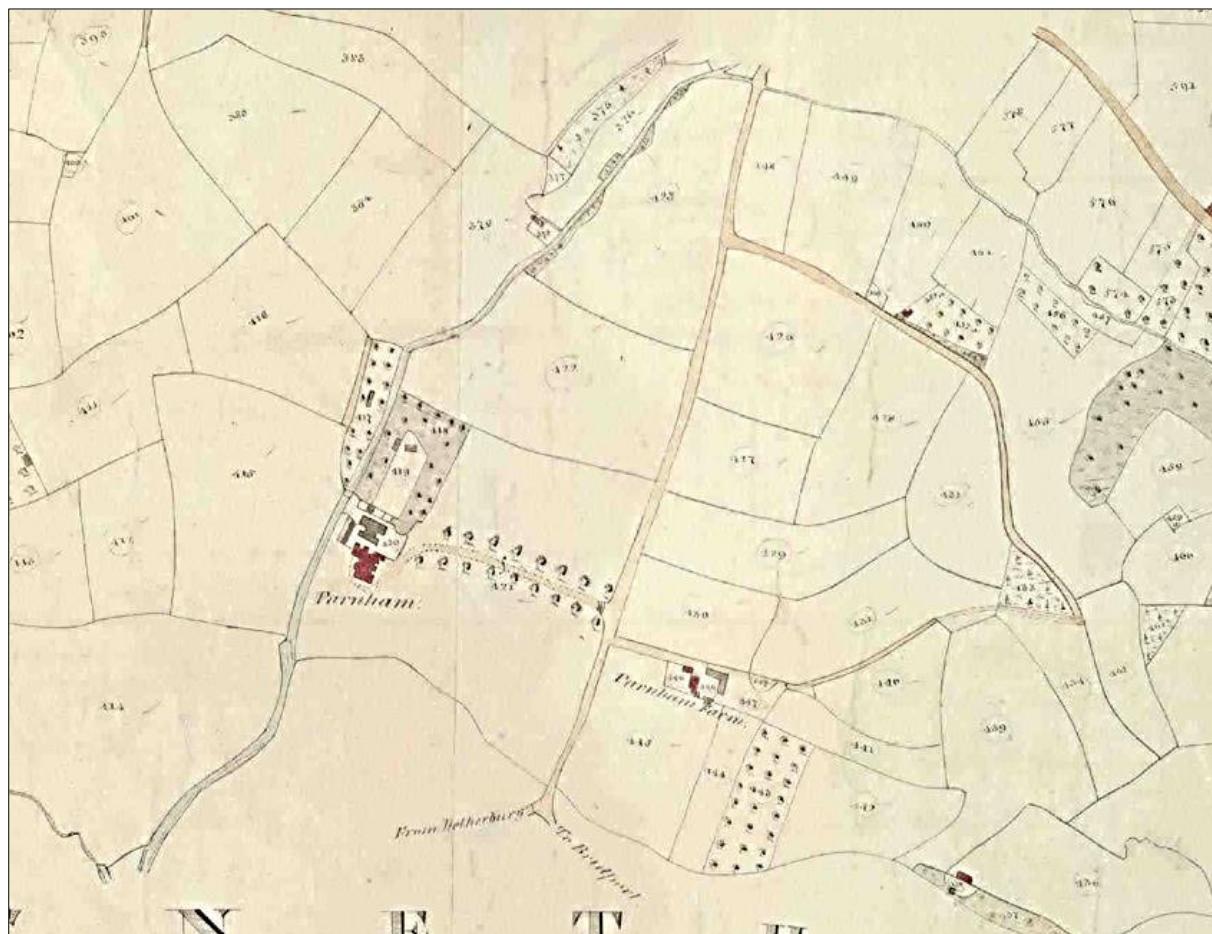


Fig.3 The southern part of 1843 Beaminster Tithe Map including the Parnham Estate © Beaminster Museum.

4.5 The D&AS includes a quote from Historic England who stated when the Applicant acquired the Estate that “the footprint and shell of the C16 house are of the highest significance and should therefore be conserved, for example, with reinstatement of the historic plan form. Significant alterations or extensions to the footprint of the building is not recommended. The East elevation retains the greatest evidence of the appearance of the Tudor manor house and should be reinstated to its pre-fire appearance. The early C19 remodelling by John Nash (the South elevation)

should be reinstated to a traditional form like the East. The West elevation offers greater opportunity for more creative intervention given the extent of the fire loss.”

4.6 The preamble to the D&AS the preamble discusses the creative re-imaging of the architecture of the building and interior spaces although there is photographic evidence to allow an accurate reinstatement of missing elements of the building, had this been thoroughly researched.

Part v of the Executive Summary states “The overriding aim is to conserve and restore this exceptionally important Grade I listed house to a standard where it will be financially sustainable, thus maintaining the heritage asset and securing its future and ensuring that it will once again be at the heart of the community.”

This is an extraordinary statement since this is a stately home which has never been open to the public and is it unlikely to be in the future. It is not at the heart of the community any more than any other building in private ownership.

4.7 Part vi of the Executive Summary states the use of a “contemporary glazed wall addition proposed on the west elevation (drawing Nos 1094-180C & 203C) allows light to be brought into a triple height space. Is this compatible with the conservation and restoration of this exceptionally important Grade I listed house? There is no obvious benefit to enclose the ruins of the 1810 John Nash Dining Room. Taken together with the new elliptical staircase replacing the Bertram Stair, adjacent to the Great Hall, this is hardly ‘financially sustainable’ when there is replica stair type 2 beside the East Porch which gives access to all levels from the ground to second floor, drawing Nos 1094-205C & 206B. The proposed works to the South wing (Nash Dining Room) which involves new steel elements to support the fire damaged external walls is unnecessary as they could remain as consolidated ruins open to the elements. There is no discussion regarding options to make savings by omitting these two new elements from the scheme thereby reducing the conservation deficit.

4.8 Conservation of the House is described within the current application No P/LBC/2025/07037. The North and West wings have already been granted consent under P/LBC/2022/05773 & P/LBC/2022/0321 respectively although how much of this work has been implemented is not clear since these works also rely on the shortfall in the conservation deficit being generated through enabling development (granted 30 November 2022 and 23 November 2022).

4.9 In the Heritage Context at Page 18, notes in detail include the spatial and functional relationship between the house and topography, river, axial driveway and the other heritage assets on the estate. It does not mention the setting of the Conservation Area.

4.10 At 4.6 on Page 21 there is a reference to the possibility of partial restoration of Parnham House with parts of the building stabilised as a ‘romantic ruin’ to which the Case Officer responded on 13 December 2024 at pre-app “It is assumed that the costs of this option would be significantly reduced compared to Options A and B meaning that the extent of enabling development would be much more limited within North Park and/or on the west side of the River Britt. This would be expected to reduce the harm to the RPG and National Landscape.”

4.11 At Restoration Proposals 5.0 on Page 23 the requirement for scaffolding is mentioned however no reference is made to the scaffolding that was in evidence in 2022 and taken down to save money. Aerial photographs provide evidence to support this fact.

4.12 Roof details reproduced in the D&AS from drawing No 1094-190C show that the new covering to the reinstated pitched roofs as already approved under P/LBC/2022/05773 is a Bradstone replacement tile not a clay tile or stone tile roof which existed pre-fire. This does not sit comfortably with the Historic England advice that the “house shall be reinstated to its pre-fire appearance.”

4.13 At 6.3 of the D&AS entitled ‘Ground Floor’ the dating of the elements of the building are incorrect. The Great Hall dates from 1550 not C15, the Library from 1550 not C18 and the Dining Room from 1810 since it was added by John Nash, figure 2 refers. From the RCHM description it is clear that the entire house was rebuilt in the middle of the C16 by Richard Strode.

4.14 At 6.8 on page 31, Mezzanine the differences to the original layout are introduced including:

1. Structural glazing to the East(should be West) elevation of the Nash Dining Room,
2. Contemporary balustrading to the Minstrel Gallery which conflicts with drawing No 1094-162D which states balustrading reinstated – the implication being that the original design is to be replicated. This glass balustrading continues from the elliptical stair which abuts the metal monolithic balustrading with stone steps. This arbitrary use of modern materials detracts from the significance of the Staircase Hall and are inappropriate in this context. In addition, there is no key or annotation for items 5 & 6 on the Mezzanine plan.

4.15 At 6.11 First Floor the differences show at 3. “a new modern flat roof structure at the existing level above” which is not specified. This is a large area and one might expect the drawings to indicate a finish other than new flat roof refer separate details on drawing No 1094-165C. 6.31 of the Heritage statement provides the answer the new Nash wing addition will have a proprietary built-up roof system. This represents a lesser quality finish where a traditional finish would be more appropriate in this context and provide greater longevity.

4.16 At the Summary on Page 34 the Applicant refers to the emergency works having stabilised part of the structure on the North and West wings which demonstrate a commitment to conserve and restore the building to the highest possible level, however some of these ‘repairs’ have been carried out in gypsum plaster and not lime plaster as would be expected on a Grade I listed building.

4.17 At 7.3 the Applicant’s Vision does not faithfully or sensitive reinstate much of the building since only a fraction of the interior of the South wing will be achieved, given that most of the work proposed is using modern materials (insulation) and new elements inserted in a reimaging contemporary restoration.

It is unclear what exactly this proposed reimaging is; it is unclear to what period of building this refers to in the restoration proposal and why this particular approach is considered appropriate. There is no inherent conservation value in what is being proposed beyond merely stabilising the ruin and saving it from further deterioration.

4.18 At 7.5 the works may enable the House to be made wind and weathertight but this is a given in any conservation project. There is an argument that more of the external and internal masonry could have been salvaged had a temporary roof been erected and maintained over the structure post 2022.

5.0 Impacts of the Proposal on the Site and Conservation Area

The Assessment of the Enabling Development of 82 Houses and 2No Hunting Lodges and associated Infrastructure

5.1 Under Vision item 2.8 in the D&AS the new housing development is conceived as a design-led community of high quality and sustainable dwellings, yet these do not have any regard to the prevailing details, materials or characteristics of buildings in the Conservation Area, moreover the design is a reinterpretation of standard details of alien proportions none of which are typical to Beaminster or reinforce local identity and distinctiveness. Therefore, the design fails to comply with ENV 10 – The Landscape and Townscape Setting & ENV12 – The Design and Positioning of Buildings.

5.2 The Enabling Development section 3 of the D&AS states at 1.2 that this has been “designed with connections to Beaminster town and has been very carefully sited to sit sympathetically within the estate to ensure it doesn’t have an undue impact on the setting of Parnham House or view to the site from the surrounding landscape.”

This design has been conceived without regard to the impact on the Brit Valley, the setting of the Conservation Area and the significance of the RPG or its setting and the setting of the other heritage assets.

5.3 The Applicant asserts at 2.2 that since the Northern part of the RPG is more remote from the House and other assets it has the capacity to withstand change. Yet the RPG is still sensitive to change and it is **not** enclosed from outside views. The assessment of sensitivity of the area has not taken into account the setting of any of the heritage assets in this banal statement. Under the Enabling Development, 3.14 the least sensitive area of the RPG is mentioned again but it does not deliver the least visibility.

5.4 Under Context Analysis the Applicant compares the design of Beaminster Conservation Area to Poundbury and Parnham. There are no similarities whatsoever between Beaminster (which is a historic market town in a bowl surrounded by hills) and Poundbury. Leon Krier designed the vision and masterplan to replicate an Italianate hill top town on Duchy land seen from the surrounding countryside on the approach into the county town of Dorchester. This is an entirely new neo classical town laid out according to Krier’s urban strict design code, see Figure 5 below.

Poundbury has no relationship whatsoever to Parnham, since this is a mixed use development implemented in four quadrants over several decades so this comparison is irrelevant.

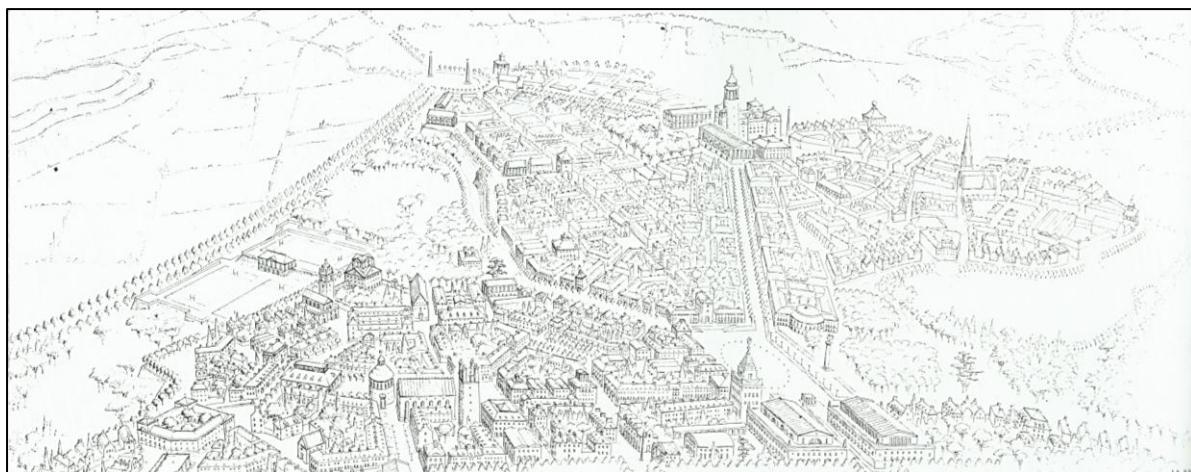


Fig.5 Page 138 Leon Krier's preliminary sketch of Poundbury from A Vision of Britain by HRH The Prince of Wales.

5.5 There are views in and out of the site, not as cited at 2.28 filtered by tree planting because for six months of the year these deciduous trees will be bare. Views are important because the bridleway and footpaths W21/58 or W21/59, including the Brit Valley Trail, Hardy's Way and Jubilee Trail are heavily used all year round. (Thomas Hardy's Way explores his imagined land of Wessex.)

5.6 The levels are established at 2.33 with an 8m fall from North to South across the site and a difference in level of 11m from the RP&P to the river Brit. This provides a clear picture of just how high the site is above the countryside and relative to the public footpath W21/58 along Millground meadow.

5.7 At 3.10 the Applicant describes the feedback from the Design Review Panel on 19 August including:

- Placemaking – is the development site an extension of the character area of Beaminster or a “parkland estate” or a mix of both?
- Potential costs of development to the west of the river and for leisure facilities.
- Concern over the St Mary Well Street end of the development and the impact of the landscape at this junction.
- Concerns over efficiency and excessive parking provision (233 spaces).
- 3 storey building heights and more terracing / tighter spacing drawing on the pattern of Beaminster using connected streets rather than suburban roads.
- Public benefit not obvious.
- Landscape, views, river and parkland should strengthen the design narrative.

5.8 At 3.16 the Applicant claims that in response the Design Review Panel's placemaking comments they have introduced a variety of character areas which reflect the site's character, specifically Parnham Woodland (type A2-A), West of River (type A10-A), Formal Approach (type A6-A), Inner Curve (type B6), The Green (type B3-B) and Deer Park (type E3-B).

5.9 Is it appropriate or necessary to adopt details from Parnham House into the development? Not only is it remote, by the Applicant's own admission, but closer to the houses in Southgate and Beaminster Conservation Area with their wealth of locally

distinctive architectural details which are far more relevant to the scale and mass of new dwellings.

5.10 In the Townscape Strategies under 4.7 the Applicant states the layout of the site is in response to the analysis of the local context, however it is driven by the need to capitalise of the financial return to fund the “curated” conservation of the reimagined interiors of the House.

5.11 Scale and Massing is dealt with in 6.2 where the three storey houses on the Formal Approach with eaves and ridge heights between 8.2m – 11.65m above ground level are sited on the highest part of the site, supposedly camouflaged behind the canopies of trees. They will, however, be seen year round from the public footpath W21/58 through the trees, beneath their canopies, several metres below the ground level of the RPG. Regardless of the this, the houses will still be seen from the Jubilee footpath which crosses the RPG East-West “winding though secret valleys which make Dorset so special” according to the Dorset Explorer see Figure 6.

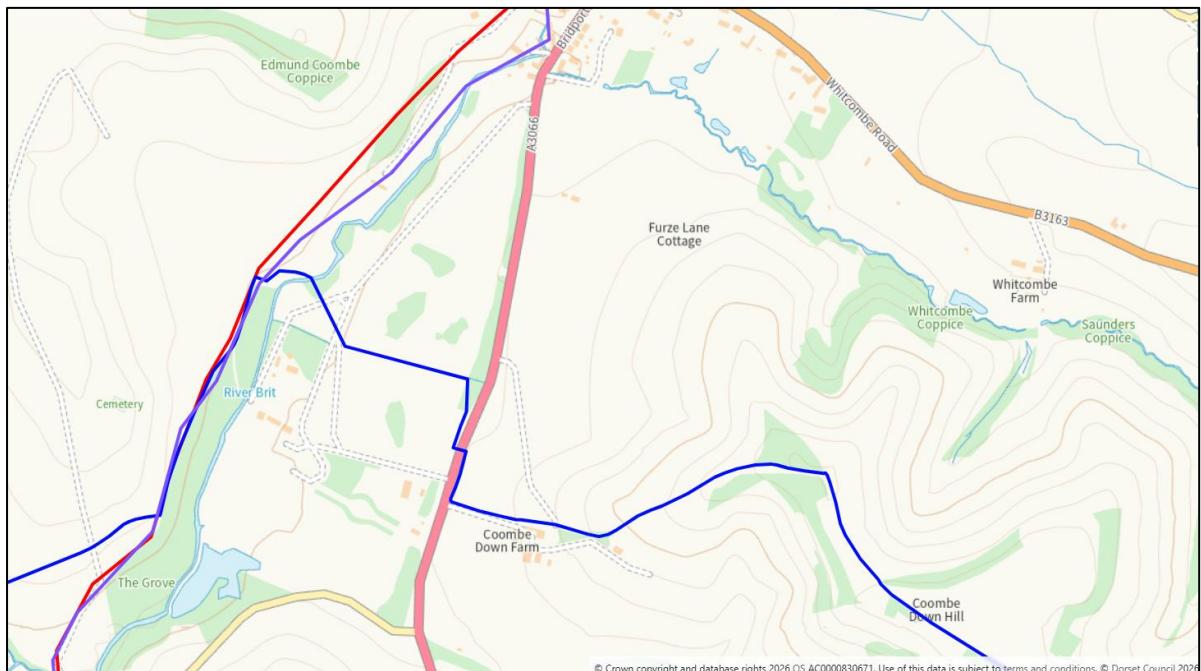


Fig.6 Extract from the Dorset Explorer Rights of Way, Brit Valley Trail (red), Hardy's Way (purple) and Jubilee Trail (blue).

5.12 The distribution of two storey houses either side of the river Brit are effectively back to back houses which have their front doors addressing either the woods to the west or the avenue of trees to the east. This means that the public footpath will be subject to light spillage from the gardens of these houses, especially those on higher ground West of River.

5.13 The imagery which is used as precedents for each of the character areas are alien to Beaminster in all but one of the photographs which is Barton End, 50 Fleet Street. These could have been annotated to help identify why they have been included.

5.14 The materials section of the D&AS does not specify the origin of the natural stone, the bricks or the natural slates but suggests the use of Bradstone tiles in lieu of plain clay tiles, double Romans or pantiles which are the locally distinctive roof coverings in Beaminster. There is even a suggestion of flint which is completely out of character for Beaminster. Without this vital information an opinion cannot be made regarding the quality of any development. The proposed use of vertical timber cladding is not characteristic of the CA, its use as cladding to entire two storey buildings appears incongruous. The wholesale use of ill proportioned vertical sliding sash windows throughout is also very uncharacteristic where a mix of sashes and casements would be more appropriate.

5.15 The appearance of the road bridge is based on the pedestrian bridge which is at most 1m wide whereas at 10.5 the suggestion is that the appearance of the concrete road bridge with a 4.5m roadway and adjacent footpath will be of similar proportions drawing No 63A refers.

5.16 The highways adjustments necessary to form a visibility splay and acoustic fencing along the Bridport Road will adversely impact on the hedgerow, embankment and the wildlife corridor that this provides. Moreover, it is an unsightly barrier which will extend for several hundred metres in length.

5.17 The summary at 14.5 states the proposed architectural detail respects the existing elements of Beaminster when there is not one single house type which looks remotely similar or shares the same palette of materials. In addition, there is no compelling argument that the locally distinctive characteristics have been understood and translated into the design of the development therefore, it is highly unlikely that this modern “extension” to Beaminster will integrate into the established settlement pattern.

5.18 There is evidence of archaeology on the RPG which will be disturbed by the development and this is shown in the Heritage Statement Part 2 Figure 5.8 by Tor & Co.

5.19 Overall there is no indication that any of the new development complies with the Future Homes Standards which became a statutory requirement at the end of 2025 or the Homes England national guidance ‘Building for a Healthy Life’ design toolkit rolled out in June 2020. This document replaces the Building for Life12 principles of good design.

6.0 The Impact of Conservation and Restoration Works on the fire damaged South Wing of Parnham House

6.1 The Significance Plan shown at Figure 4 of the Heritage Statement, shows the ground floor outlined in three colours, in relative importance from high, medium to low, but no interpretation of how this has been evaluated.

6.2 The sections of the house altered during the ownership of the Strode family are identified as high, whereas some of the Nash period of alteration and all of Sauer’s alterations are considered to have only medium significance. The Treichl’s (who introduced the deer park in 2001) are rated of low significance. The Applicant’s

alterations from the late 2020 are also rated as low significance when in reality they have no significance.

This is not a very compelling analysis since no weight has been to any heritage values through a physical or documentary discovery of the historic fabric.

6.3 Analysis of the chronological sequencing is the starting point for a much deeper examination of significance.

For example, the evidential value and potential of Parnham House lies in the appearance of the virtually intact East elevation of the former Tudor manor house, by the Strode family. Though much restored by various alterations and extensions, the house is of high architectural value because of the contribution made John Nash in the early C19 in the Romantic style. The whole is of high significance, marred only by C21 accretions. The Nash work has been modified by Vincent Robinson's C19 removal of Nash's timber fenestration. The refronting of the Stable Block by Hans Sauer between 1911-13 in imitation of the stables at Chantmarle, the other Strode House. The front courtyard and south terrace were also part of the Sauer works in C17 style. An appointment and examination of documents at Beaminster Museum would reveal the most accurate record of what changes were made by whom and when.

6.4 Therefore, it could be argued that the Significance Plan is unreliable.

6.5 The Heritage Statement Part 1 Technical Appendix B3 provides justification for the insertion of the new contemporary stair relying on the very tenuous argument that the replacement is "in tune with the spirit of the 'grand staircase' of the gentry houses of the early modern period realised in contemporary form, but is also reflective of the Makepeace years of Parnham as a college, where contemporary design and materials craft were the basis of the pedagogy."

6.6 Archaeological interest is discussed under significance in the Heritage Statement although no mention is made of the archaeological remains in the RPG which appear in the Part 2 of the Heritage Statement (Iron Age Beaminster). It would appear that the setting of the Conservation Area and RPG are not subject to the same degree of scrutiny as the other heritage assets except to identify the existence of a former brewhouse on the NW corner of the kitchen wing.

6.7 What is clearly missing from the analysis of Part 1 is the **commemorative value** of the RPG and the meaning of the place for the people who use it today or for whom it has a personal attachment (not forgetting the former owners who still live in the town).

There is a private cemetery to the west of Parnham House, maintained by Rhodes-Moorhouse Trust which comprises two graves to William Barnard Rhodes-Moorhouse VC, (aviator in WWI) 1887-1915 and his son William Henry Rhodes-Moorhouse (aviator in WWII) 1914-1940. There are associative values relating to American officers occupying part of Parnham House in 1943 and 100's of soldiers camped in Quonset huts in the parkland.

6.8 Parnham House was subsequently used as a Mental Health Ladies Home until 1973. There are people in Beaminster who remember the local GP visiting to carve

the turkey on Christmas day. It is also a place with **communal value**. Attention should be paid to those collective memories .

7.0 Review of Drawings

7.1 There is scant information on the drawings regarding specification of materials, all wrongly annotated and the bricks are shown in stretcher bond. Uncharacteristic materials for example widespread use of Bradstone tiles, flint and also excessive use of glass rather than metal balustrading. Single ply roof coverings are specified to all roof terraces at first floor level. Dressed stone (ashlar) is not differentiated from random rubble clearly. Stone quoins and lining out is drawn wrong thus appearing mean in proportion.

7.2 Windows are equally of the wrong proportions and the use of Crittall (steel) windows and doors in kitchen locations which are unlikely to be approved by Building Control because of cold bridging.

There is a wide variety of porch types, timber framed, pent roofs and Regency canopies. It is also clear that if there was any intention to build lifetime homes, this is not now likely. There are no Part M facilities for people who are less mobile.

There are internal kitchens / dining rooms of 35.9m² (Type A6).

3 storey buildings with blank gable ends and only 3.5m between houses with 2 paths accessing the two storey garaging at the rear, this occurs on the Formal Approach character area,

7.3 The site plan drawing No 71A titled site parking with garaging parking in blue, shows most houses with solar panels, but the individual house roof plans and elevations do not.

Not all the houses are capable of benefitting from green energy where they have hipped roofs, A4 type (less area) and integrated solar which have 6 panels only facing SE while those house types B3 and BA on the other side of the estate road have 10 and 4 panels facing NW. The logic suggests that solar panels are limited to the rear elevations, but this means that they are all oriented the wrong way since to deliver maximum efficiency all solar in the northern hemisphere needs to be aligned south or SE or SW. If the houses rely on air source heat pumps for heating where is the battery storage and where are the ASHP's?

7.4 The design of the two 'hunting lodges' in Parnham Gateway character area, are part of the hospitality offer are in complete contrast to the rest of the site seemingly taking their inspiration from Montacute House see Figure 5 below. Are these locally distinctive since their origins are in Somerset not Dorset?

7.5 The grandest houses (Deer Park) facing south all have mansard roofs and yet their sky surfaces are virtually flat and cannot be covered with natural slate, they would need to be covered in either lead or zinc to be compliant with best practice and current Building Regulations.



Fig.6 Extract from Montacute House website © National Trust.

8.0 Cumulative Impacts arising from West Dorset, Weymouth & Portland Local Plan Policies ENV1, ENV2, ENV3, ENV4, ENV5, ENV10, ENV12, ENV15 and ENV16 which significantly and demonstrably outweigh any potential benefits

- a) In terms of harm to the historic environment, the proposal does not safeguard or enhance the significance, character, setting and local distinctiveness of heritage assets, these being the designated Brit Valley Character area of the Dorset National Landscape, sub-area 'a' of Beaminster Conservation Area, Grade I listed Parnham House, Grade II* registered Park & Garden Grade II* Stable Block, Grade II* Kitchen Garden Walls, Grade II Front Courtyard & South Terrace Walls & gazebos, Grade II Ice House, Grade II The Lodge and the non-designated heritage asset – South Lodge contrary to ENV1 Landscape, Seascape and Sites of Geological Interest & ENV4 – Heritage Assets.
- b) In terms of harm to the landscape character of the area, the proposed development will significantly erode the open and undeveloped landscape setting of the Conservation Area and RPG and would not conserve or enhance the open landscape character of the area, preserve or enhance the character and appearance of the area, nor reinforce local distinctiveness and respect local context; contrary to Local Plan Policy ENV10 - The Landscape and Townscape Setting, ENV12 – The Design and Positioning of Buildings & ENV16 - Amenity.
- c) In respect of the setting of all the heritage assets the proposals disregard to the important contribution made by trees on the site which were protected under TPO/2021/0046 in December 2021, TPO/2022/0021, TPO/2022/0022 by Dorset Council following confirmation that trees were currently unprotected by either a TPO or within a Conservation Area.
- d) Essentially this quantum of new housing on the most elevated northern end of the RPG will be highly damaging in landscape terms and visible right across the Brit Valley

from public footpath W21/58 and bridleway W21/59. It is development which is alien to the character of sub area 'a' of Beaminster Conservation Area which is defined as a nucleated settlement with a rich palette of building stones, bricks, roofing tiles and slates, along with typical architectural details. This comment describes harms which relate to ENV4 – Heritage Assets, ENV11 – The Pattern of Streets and Places & ENV12 – The Design and Positioning of Buildings.

- e). The impact on the heritage assets includes the loss of the important open character of the DNL Brit Valley setting; the introduction of an architecture of an incoherent form at odds with the historic pattern and grain of the Conservation Area; the urbanisation of the RPG and an increase in noise and light pollution from vehicles and houses. The loss of important uninterrupted views of undeveloped pasture and the wider landscape will change the key elements of the setting of these heritage assets.
- f). The open aspect of the application site is evident from the open pasture to the west from footpath W21/58 and from bridleway W21/59 to the west. This open setting is sensitive to change. A few unlisted buildings visible on the boundaries of the site, Millground Cottages and the remnants of the Mill, do not detract from the open undeveloped character of the setting of the heritage assets.
- g). The development would materially harm the values of the heritage assets at the southern entry into Beaminster Conservation Area at Southgate which has a coherent nucleated settlement pattern and will not be reinforced or further enhanced by new interventions of a radically different nature contrary to the close grain of houses with uninterrupted views out into countryside, dominant hills and groups of veteran trees.
- h). Despite its proximity and status none of the characteristic of the Conservation Area have been included in the Applicant's Heritage Statement, which is therefore considered to be incomplete. The key aspects of setting have not been examined sufficiently thoroughly to conclude that the impact of development will affect the ability to appreciate the visual dominance and contribution made by the Brit Valley which is a cherished local scene.
- i). Justification for the development in terms of impacts on heritage values has also failed to take into account Grade II* listed Kitchen Garden Walls, Front Courtyard and South Terrace Walls and Gazebos. Whilst this asset is further removed from the town edge than the other heritage assets that will be impacted, the proposed development will dominate the ridge above the listed house and lie within its setting.
- j). Housing delivery and commitments for Beaminster are currently running in excess of minimum targets with permission already granted at Broadwindsor Road and Land End Farm, one of which is under construction. This adds a further reason for refusal, as housing development on the site would be inefficient use of land having regard to local area character and contrary to the defined development boundary.

9.0 Conclusions

- 9.1. This report concludes that the proposal fails to comply with Paras 213 and 221 of the NPPF, s.66 (1) and s.72 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Local Plan policies listed at section 7.0.

9.2 The proposed development does not deliver sufficient benefits to outweigh the cumulative harms identified in this report, for the following reasons:

9.3 Firstly, the Applicant's D&AS considers the removal of veteran trees which make a positive contribution to the TPO group and are visible from the conservation area as a 'benefit' but in reality it will cause the greatest harm by opening up the view of houses elevated above the surrounding buildings at Southgate to direct view from the public footpath W21/58 and bridleway W21/59 in north, south and east directions. This will have a significant adverse impact on the setting of the character of the Dorset National Landscape and on the setting of the Conservation Area, the Ice House, the Parnham House, the Stable Block, Kitchen Garden Walls but less so on The Lodge.

9.4 The new view from the Conservation Area of the proposed development is not considered a 'benefit', as claimed by the Applicant, because the existing view of uninterrupted green spaces, lined with trees either side of the river corridor is a key element of setting whilst providing diversity and a valuable wildlife habitat in accordance with ENV3 – Green Infrastructure Network.

9.5 The proposed development would neither preserve or enhance the character or appearance of Beaminster Conservation Area (sub area 'a') or its setting.

9.6 In addition, the management guidelines of the Dorset National Landscape have not been observed, particularly with respect to the mitigation of noise and light pollution recognising the impact these issues have on tranquillity and undeveloped rural character. Therefore, any development will disturb the peaceful open countryside.

9.7 In NPPF terms 'substantial harm' means actual physical destruction of heritage assets. This report finds that the identified heritage impacts arising from the proposed development would amount to substantial harm, which in NPPF terms is still real and serious harm.

9.8 Dorset Council should take into account that the proposed applications fail to satisfy the requirements of NPPF para 210 in respect of :

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

9.9 Furthermore the proposals would result in substantial harm to the setting of the several high status heritage assets as described in NPPF Para 213, and failure to satisfy the test in Para 221. This test requires the benefits of a proposal for enabling development, which would otherwise conflict with planning policies to secure the future conservation of a heritage asset to outweigh the disbenefits of departing from those policies.

Kim Sankey BA(Hons) DipArch, AADipCons

Report D – Ecology and the Natural Environment

1. In this Appendix, we provide comments on the implications for the ecology of the area affected by the proposals, and the information on ecology and impacts on ecology included within the Application.
2. The comments are organised into the following topics:
 - a. Key ecological issues
 - b. The high value of the protected landscape and its ecology
 - c. The inadequacy and non-compliance of the approach to assessing impacts on ecology / EIA
 - d. ED is not a tool to improve biodiversity
 - e. BNG – the Habitat Management and Monitoring Plan.

Key Ecological Issues

3. It is acknowledged generally in the EclA and other information within the Application Documents that the ED will be ecologically harmful and will have an impact on the protected landscape.
4. The current Park, as a whole entity, is of immeasurable historic and ecological value. It incorporates a raft of ecological and landscape designations designed to protect it from any sort of development, particularly development of this scale.
5. Parnham Park (including the ED redline area and Millground) has remained fundamentally unchanged for at least 200 years. This is noted in the EclA: “The north park remains essentially as lineated on the OS surveyor’s drawing (c 1800), the 1890 OS map, and the 1896 sale particulars”.
6. Such undisturbed habitat as this is a rare phenomenon now, and its loss and disturbance would materially adversely affect its biodiversity. It is not certain by any means that it is possible to mitigate the direct loss of such habitat, and the impacts on its biodiversity.
7. The Park (including the area of ED) includes populations of:
 - a. Schedule 1 birds, which have the highest legal protection under the Wildlife and Countryside Act 1981, including Kingfisher, barn owl and sparrowhawk.

- b. UK BAP priority species – those that are identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP) – including: skylark, linnet, yellowhammer, spotted flycatcher, house sparrow, marsh tit, bullfinch, starling, song thrush. BAP mammal species include water vole, hedgehog, otter, harvest mouse, dormouse, polecat, and species of bats.
- c. Amphibians and reptiles which occur on the Parnham estate include common toad, slow worm, grass snake and common lizard.

8. So long as no destructive forces are present, landscapes and their habitats develop in richness and diversity over time. As such their value is immense and irreplaceable, and they cannot be ‘recreated’ somewhere else in an effort to make up for what has been lost. Parnham has been established and relatively undisturbed since the 16th century; once developed, this continuity will be lost, forever.

9. The UK is one of the most nature depleted countries in the world (RTPI Research Briefing May 2025, citing National Biodiversity Network State of Nature Report 2019), and whilst the causes are many, urban development is a key driver. Hence any loss of habitats, particularly the rich, diverse and valuable ones, needs to be weighed up very carefully.

10. Dorset Council states (<https://www.dorsetcouncil.gov.uk/w/planning-for-biodiversity>) that it has “a legal duty to conserve and enhance biodiversity” and it has “adopted guidance to help maximise opportunities to address climate change when considering applications”.

11. The Council also acknowledges (<https://www.dorsetcouncil.gov.uk/w/biodiversity-net-gain>) that “over 400 land and freshwater species recorded in Dorset in the past are now thought to be extinct. Activities such as building, pollution, industrial farming and forestry, and climate change have all contributed to this loss of wildlife in our county”.

12. The scale of development proposed is surely in direct conflict with these policies.

13. Biodiversity continues to decline nationally. Fragmentation of habitat is a critical issue: species cannot exist on small conserved ‘islands’ but need to move through the landscape in search of resources, mates and territory. As habitats become more fragmented their connectivity decreases and their quality and viability declines. Linking habitats through networks and corridors is essential for ecological sustainability.

14. The habitats comprised in Parnham Park and the surrounding area have significant value:

- a. Some of the most valuable and biodiverse habitats are composed of ‘mosaics’ i.e. an assortment of habitat types that lead into one another with a wealth of boundaries between them. This diversity across a relatively small area can support a correspondingly diverse and abundant range of species. Parnham currently has river, riverside, meadow, grassland, woodland and wood-pasture/parkland habitats. Whilst the condition of some of these could certainly be improved with sensitive management, their value as a whole entity should not be underestimated: the whole is worth a great deal more than the sum of the parts.
- b. Parnham has been identified by the Forestry Commission as having ‘high spatial priority’ within the Woodland Priority Habitat Network. It already offers some good continuity of resources and cover, linking areas within, across and outside its boundaries, and could be improved by new planting to strengthen the network of woodland in the area.

- c. The proposed development would have the opposite effect; whilst small patches may be moderately 'improved' for nature, it would mainly serve to fragment the existing, interconnected but fragile landscape, cutting habitat links and corridors, with biodiversity – not just at Parnham but in the surrounding area too – being diminished as a result.
- d. Riparian corridors connect terrestrial and aquatic ecosystems. The river acts as a corridor which connects different habitats and enables wildlife to migrate;
- e. Riparian vegetation's root systems stabilise riverbanks, holding soil in place, preventing erosion and excessive sedimentation from reaching the water. They also filter run-off pollution, absorbing and trapping nutrients and chemicals, playing an essential role in maintaining water quality. River corridors play a key role in mitigating flood effects on land, dissipating the energy, speed, and volume of flood water, and preventing downstream damage.
- f. Any disturbance on the River Brit would result in damage to its biodiversity. A riverside walk would inevitably affect all the wildlife that relies on it for food, habitat or migration (otters, water vole, kingfisher, dipper, dragonflies, beautiful demoiselle, golden ringed dragonfly, southern hawker etc).
- g. Permanent pasture is crucial for nature, serving as a vital habitat, a significant carbon store, and a foundation for healthy soil and water systems. Its ecological value is often highest in semi-natural or "unimproved" grasslands managed with low intensity.
- h. Permanent pastures, particularly species-rich grasslands, host a vast array of wildflowers, grasses, legumes, and herbs that cannot thrive in intensively managed swards. This plant diversity, in turn, provides essential food and habitat for a wide range of wildlife, including pollinators (bees, butterflies), invertebrates, and farmland birds.
- i. Permanent pasture, besides having a multitude of benefits for pollinators, has benefits for creatures such as hedgehogs, which feed extensively on invertebrates, and occur at Parnham.
- j. Any depletion of the permanent pasture at Parnham would detrimentally affect invertebrates including our struggling butterflies such as holly blue, brimstone, gatekeeper, large and small skipper, speckled wood, orange tip and green veined white and even the chequered skipper etc, all of which occur, or have occurred at Parnham.
- k. Veteran trees, with their decaying wood, provide hollow cavities for roosting, nesting, and shelter sites for birds, bats, and other animals. The decaying wood and fungi that colonise veteran trees are a vital food source for many species including insects and beetle larvae. Veteran trees support unique and long lived communities of fungi, lichens, mosses and invertebrates that rely on the specific conditions created by decay. Veteran trees are an irreplaceable habitat.
- l. Removal of established trees involves destruction of part of a whole irreplaceable ecosystem, which is impossible to be replaced by planting a few more young trees.

15. The Enabling Development:

- a. Will cause fragmentation of habitats, reducing corridors and links with other surrounding habitats, both within and outside of Parnham Park's boundaries, with a corresponding loss of biodiversity;
- b. Will cause irreparable loss of designated habitats and landscapes (particularly National Landscape, Grade II* Registered Park and Gardens, and Wood-pasture and Parkland Priority Habitat designations). Once subject to development on this scale, these assets, part of whose value comes from their longevity, will be gone;
- c. Will put notable and protected species at risk.
- d. Is contrary to Dorset Council's legal obligation to conserve and enhance biodiversity.
- e. Is not ambitious in its BNG requirements in terms of environmental upgrade and comes with no real guarantee that the BNG requirements will be fully implemented and successful. There is a difference between aspirations set out in technical reports and actual effective and sustained delivery. Long-term multi-faceted habitat improvement schemes in existing environments are notoriously complex to deliver, expensive, and complex to monitor and maintain.
- f. Should not be seen as a means to improve the biodiversity of other parts of the Park via BNG: managing the land well for biodiversity should simply be part of good land stewardship.
- g. Will introduce noise and light pollution to an area currently tranquil, reasonably quiet, and dark at night, introduce additional human disturbance including through the diversion of the Millground footpath closer to the River Brit and potential increased use.
- h. Will result in more pets in the area with a corresponding increase in wildlife casualties (hunting cats) and river pollution (tick, flea and worm treatment from dogs, either via faeces or them entering the water).

16. The BNG, if implemented properly, may bring certain benefits to some of Parnham Park's habitats. However, the irreversible harm that will be caused by the development far outweighs any gains from BNG.

The high value of the protected landscape and its habitats and ecology

17. The clear policy requirement to preserve areas such as this is set out clearly in the Dorset Local Plan (2015):

“the natural environment of Western Dorset is one of its greatest assets” and “Development should protect and enhance the natural environment – its landscape, seascapes and geological conservation interests, its wildlife and habitats and important local green spaces – by directing development away from sensitive areas that cannot accommodate change”.

18. This prioritises the protection and enhancement of environmentally sensitive areas particularly the gently undulating landscape and coastline of this part of the Dorset National Landscape whilst also supporting the communities that live there.
19. The environment which supports important wildlife is part of the National Landscape, which also enjoys protection of its “Special Qualities” as set out in the sections 5 and 11A of the National Parks and Access to the Countryside Act 1949 (as amended) and section 87 of the Countryside and Rights of Way Act 2000.
20. The Council has duties of the Levelling Up and Regeneration Act 2023 (LURA) to avoid harm to the statutory purposes of the designated landscape; and to further the conservation and enhancement of the designated landscape. Regard must also be had to the relevant policies of the NPPF and in particular the tests in para 190 NPPF. These have priority over local planning policies) under section 245 (Protected Landscapes)
21. The ecology and natural environment of the Brit Valley are valued enormously by local people and visitors alike. The protected landscape – and the ecology it supports – is an inherent part of the identify and experience of this area. Once lost, these landscapes and habitats which support important wildlife are not replaceable.
22. The irreversible loss and destruction of the protected features of this landscape, and the natural environment generally, as proposed in the ED Application cannot be offset by purported improvements on other land. The landscape and habitat will be irreversibly changed and damaged.
23. Such damage and loss would not be permitted to occur but for the assertions of the need for ED. This is a material consideration as regards ecology. It is not likely that but for ED any development in this area would be permitted.
24. The irreversible loss and damage of the natural environment is a significant disbenefit of the ED Application and one which is not outweighed by any purported benefits.

Inadequacy and non-compliance of the approach to assessing impacts on ecology / EIA

25. It is noted that the Applicant did not engage in any pre-application consultation with the Council’s Environment Team (EclA para 1.13) nor, we assume, Natural England.
26. The Applicant did not submit an EIA scoping request: the Applicant chose to scope out ecology from the EIA, scooping in only cultural heritage and landscape impacts.
27. The potential for likely significant effects on ecology is supported by Natural England’s response (24 December 2025) which notes the permanent loss of a priority habitat, as well as the potential to impact on bats (and the inadequacy of the proposed buffer) and European Protected Species (otters and dormice) as well as the potential to impact on dipper. The response of Dorset Wildlife Trust also expresses concerns about the impacts of the ED on ecology.
28. It is obvious by its very nature that the destruction of currently undisturbed habitat, the construction activities associated with that, and introducing structures and human activity

(including noise, lighting disturbance, and people and pets) in an intensive way into this area can be expected to give rise to significant effects on ecological receptors.

29. On this basis, and given that the Applicant determined EIA was required, there is no sound basis for scoping ecological impacts out of the EIA itself.
30. The Council will need to consider whether the EcIA is sufficient for the purposes of the EIA Regulations, such that the Council has the necessary environmental information before it at the time of determination of the application. DNHI does not believe that sufficient environmental information exists.

i. Baseline

The Council should have significant concerns whether the assessment of the baseline is adequate:

- a. The Ecology Report quotes at length from a 2003 report, ('Historic Parkland Restoration Plan for Parnham Park' by Lear Associates. A copy of this report is not provided. It appears that this report is relied on extensively to describe the site as part of the review of the baseline. However, a 20-year old report is not an appropriate source for establishing a baseline.
- b. The EcIA states that, "this Ecija has drawn on information collected through both an extensive desktop study, and a field visit carried out by Specialist Principal Ecologist, Dr Robert Souter MCIEEM of EPR on 5th February 2025 and 30th / 31st July 2025". Species-specific surveys were carried out in 2022/23, which normally would be considered out-of-date by this time. The Report asserts that the two 2025 site visits were sufficient to establish that those surveys are still reliable, on the basis that there had been no changes to the features of the site. It is difficult to see how a short visit (one during the winter) is adequate to establish that those surveys are still reliable. Our current information on the protected species at Parnham disputes their claims.
- c. There are brief references to water vole, hedgehog, harvest mice and water shrew. The Ecological Report (3.196) states that "no specific survey was carried out for Hedgehog), although they could occur in the local area. It is not considered further". It is well known that there is a healthy hedgehog population in Beaminster, and dead hedgehogs have been seen on the road outside the Dower House and hedgehogs have been found this year in the Isaac Cider Farm opposite Parnham. Hedgehogs are a BAP priority species. The Report does not explain why there was no further consideration or assessment of hedgehogs.
- d. There is only a passing mention of kingfishers (3.197) in the EcIA. Kingfishers are a Schedule 1 species, meaning that they have the highest legal protection under the Wildlife and Countryside Act 1981. This species is known to patrol the river regularly and yet there is no survey data to establish its existence or analysis of potential impacts.
- e. Section 3.192 states "...the river is shallow and unlikely to be a favoured location for a population of Otters to be supported so are not considered further". However, this is contradicted by regular and recent sightings of otters by locals, including 5

December 2025 and more recently. Locals of otters, a protected species, proliferated – even in the last few days (5.12.2025). The potential for impacts / likely significant effects is not dependent on whether there are otter holts on the river but whether they are present: they are as there have been numerous recent sightings.

Construction activities and the new houses themselves clearly have the potential to impact (and give rise to likely significant effects) on otters travelling through this stretch of the river.

ii. Assessment of effects / impacts

31. The adequacy of the assessment of ecological impacts is also undermined by the lack of reference to any particulars or characteristics of the ED, which it is essential to set out and have reference to in order to properly understand and assess potential impacts (or likely significant effects) on identified receptors. It is not possible to undertake an assessment without being clear on what activities and development are the potential cause of any impacts; and in the absence of that statements on mitigation must be seen as deficient.
32. In this respect:
 - a. There is no description of the development in the EIA that is the subject of assessment, only a series of plans. Plans are not sufficient to describe development.
 - b. There is no information on the nature and duration of construction activities, including periods of likely disturbance to ecological receptors, the sequence or phasing of development, specified construction activities (such as excavation, piling, earth moving and material stockpiling or construction compounds), noise from construction equipment, or the presence of operatives in habitats.
 - c. Their reliance on a construction environment management plan (CEMP) as mitigation is flimsy.
 - d. Key elements of the design, the details of which should be set out in order to understand potential impacts, are missing. For example, details of the proposed bridge over the River Brit, are not provided. It is not therefore possible to assess the likely significant effects or impacts of the bridge. In particular, as there is no construction design or methodology for the bridge, it cannot be known that its construction and presence will not have impacts; or indeed that those impacts can be mitigated. The only reference to mitigation relates to once it is constructed, and potential shading impacts. Construction of the bridge itself, including disturbance to the river banks and activities within habitat used by dippers, otters, kingfishers and other species, has not been assessed. The only reference to mitigation in relation to the bridge is to deliver some compensation for shading from the bridge when in situ, in another location, which is not specified. It is also not explained why shading is a potential impact for ecological receptors, or how providing such mitigation elsewhere is necessary, or how it would actually mitigate the presence of the new bridge structure in the River.
 - e. There is no information or description of the nature of the future operation of development, which might be expected to impact on ecological receptors, such as noise and lighting from residential units, increased human activity in the area, and

pets such as cats, which are a particular risk to small mammals and birds. The only reference to operational impacts relates to low-level lighting in the roadways within the residential development.

iii. Mitigation

33. In relation to the mitigation of construction impacts:
 - a. It cannot be said at this time that the impacts of construction activities on ecological receptors have been adequately assessed because the actual construction activities that might result in impacts on ecology (or likely significant effects under EIA) are not identified. All that is known is that there will be construction.
 - b. In turn, it cannot be said that the provisions of a CEMP (which is yet to be prepared) can be relied upon. There is no certainty that a CEMP will be able to mitigate the likely significant effects of particular construction activities that are not known at this time, and have not been assessed. For example, there is no reference in the EclA whether species relocation would be required, or any seasonal restrictions on construction activities; and
 - c. It would be legally unsound for the Council to defer assessment of those impacts until reserved matters or discharge of condition stage.
34. In relation to the mitigation of operational impacts, there is barely any information other than references to a low-level lighting strategy and reliance on an HMMP, which mainly seems to be focused on delivering BNG commitments. However, the presence and activities of residents and others visiting the site are likely to give rise to potential disturbance and other impacts on species and habitats, such as noise, lighting (including external lighting such as security lights), vehicle use, and pets. Given there is no assessment of the potential impacts of such activities on ecology, there is no attempt to specify whether mitigation should be put in place; or indeed whether such mitigation would be adequate.

iv. Conclusion

35. A fundamental principle of EIA (and assessment generally) is that only those impacts which have been assessed (and, where necessary, mitigated) are permitted to occur within the scope of a grant of planning permission.
36. Given the serious and obvious flaws in the approach to assessment of ecological impacts, the environmental information / ecological impact study is lacking and not sufficient to allow grant of planning permission.

ED is not a tool to improve biodiversity

37. The Applicant asserts that a key benefit of the ED Application is that it will deliver ecological improvements elsewhere within Parnham Park.

- 38. Leaving aside whether it is possible to off-set the loss of habitat on this scale simply by making incremental improvements on other existing land (in this respect, the Natural England response of 24 December 2025, casts significant doubt as to whether this could be the case), clearly it is a fallacy that in such a case as the ED – where development involves the destruction of priority and protected habitats, and adverse impacts on ecology – that the need to off-set those impacts is a “benefit”. It is not. It is a statutory requirement.
- 39. Moreover, the improvement of other habitats within Parnham Park is not and should not be dependent on obtaining planning permission for the ED, or any other development.
- 40. It is ironic that so much harm and fragmentation should have to occur in order to put some effort into improving the remainder of the land that is left; and that such efforts to achieve a 10% net gain are likely to be challenging and potentially unachievable in any event.
- 41. It has been possible for the Applicant, from the date it acquired the land, to take steps to improve habitats and support wildlife at any time as part of good land stewardship. The Applicant has not taken any such steps and it appears they would only do so if they obtain planning consent for the ED and implement it. Many of the measures outlined in the accompanying HMMP could be done anyway. For example, areas of Himalayan Balsam in the Millground were routinely cleared in the past by the previous landowner to prevent its spread. The Applicant has not apparently done so.
- 42. Given the perilous state of nature in the UK and the policies that have been developed nationally and locally to improve the situation, all landowners should be doing what they can to conserve and enhance the natural environment and biodiversity on their patch. This is not a legal requirement, but a feature of good stewardship.
- 43. However, the Applicant is only planning to make such improvements as a result of the legal requirements for BNG relating to new development. No weight can be given to their assertions that they care about ecology.

BNG and the Habitats Management and Monitoring Plan (HMMP)

- 44. The approach to mitigation of impacts on ecology (including habitats lost to the ED) is largely confined to attempting to deliver improvements within the land owned by the Applicant within the red line boundary and elsewhere in Parnham Park, set out in a Habitat Management and Monitoring Plan.
- 45. We note above that the EIA does not refer to specific mitigation measures to reach its conclusion that impacts on ecology will be appropriately mitigated. It simply refers to the fact that an HMMP will be in place. The measures set out in the HMMP are not therefore tied to assessment of specific impacts and it is not clear that the HMMP comprises adequate mitigation of direct and indirect impacts on ecology resulting from the ED itself. In that sense, the HMMP appears to only be an improvement plan for the remainder of the Park that cannot at this time be said to deliver the mitigation necessary for the ED itself.
- 46. In a number of respects the HMMP is hardly ambitious. Mostly, the habitats affected by the ED that it proposes to retain, enhance or improve are mostly to poor improved to moderate, and where moderate, to fairly good. Wood-pasture is proposed to be improved

from poor to good, and where already Moderate improved to Fairly Good. The only ambitious one is for the Wood-pasture and Parkland which is Poor to Good. The parkland habitat in the rest of the deer park will be improved to Good. As we note above, these are all improvements that the Applicant could deliver without the need for any development if it so wished.

47. It also proposes and goes into detail of 'off-site' delivery (i.e. not within the development area) in the rest of the Parkland stating 'Parkland Habitat in the remaining deer park also in Poor condition and will benefit from commitment to manage it to improve its condition to Good.'
48. DNHI does not consider that the Applicant has established that the measures in the HMMP are deliverable, that they are adequate mitigation for the impacts of the ED.
49. Further, the delivery of an HMMP may also give rise by itself to impacts on ecology outside of the ED red line that should be considered within the scope of the ecological assessment.
50. There is very little research available to establish whether BNG is successful in delivering stated improvements. However, research was recently carried out by the University of Sheffield looking at 42 completed developments across 5 Local Planning Authorities which involved looking at nearly 6,000 houses and over 291 hectares of land. They found that only half of the ecological features – 53% – that had been conditioned were present. When they excluded newly planted trees, this fell to a third – just 34%. They suggest that this reflects the lack of government resources/staff put into this entire process, and especially enforcement and compliance, at both national and local levels.
51. The HMMP envisages a lifetime for the measures it proposes of 30 years. "Update reports will be produced to provide feedback to the stakeholders". It is not clear how or by whom the monitoring is carried out – there is no methodology for monitoring.
52. In considering whether the HMMP is satisfactory and – crucially – deliverable, the Council should have regard to inherent risks in securing delivery of such a complex scheme over many years, and its consistent monitoring. It is a material consideration that the resources of and priority given to it by any landowner will dictate the comprehensive delivery and monitoring of such a complex scheme over 30 years. It will be highly dependent on the ability of any landowner to fund and continue to resource the scheme and embrace its requirements. It would also require rigorous on-the-ground assessments by dedicated personnel, including within the local planning authority.
53. The delivery and monitoring of improvements to habitats in such a large area is challenging and requires consistency, resources, and the ability to enforce against a landowner in cases of non-compliance. This requires a high level of monitoring, reporting, and vigilance on the part of the Council; and certainty as to the resources and long-term commitment of an applicant.
54. Whilst it is open to the Council to seek to control the development and the delivery of the HMMP through planning conditions and any s106 obligation, it is a material consideration that the effectiveness of any such controls is highly dependent on the certainty that the landowner will comply with such obligations, long-term. The assertions of the Applicant are not relevant in this respect because the site could be sold and any future owner may not undertake the necessary works.

55. If that were to occur when the ED had been built out, the disbenefits would occur with no adequate mitigation, to the extent that would even be possible.
56. The risks are such that the disbenefits of the ED cannot be said to outweigh the benefits.

Report E – Impact of the Planned Housing Development at Parnham (P/FUL/2025/06865) on the River Brit with Specific Reference to Sewage Treatment

Authors

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Executive Summary

The current state is that the upper River Brit

- is in decline
- suffers from regular sewage discharges
- floods into Netherbury, bringing sewage into the streets.

How this development deals with sewage is therefore a very important aspect of the overall plan, as it has the potential to impact neighbouring residents adversely.

The planned development at Parnham will cause further harm as:

- The plans for sewage treatment are incomplete and muddled, as different plans show different layouts
- There is no justification presented for the use of Packaged Treatment Plants in the application when the site is close to a main sewer and, by Dorset Council's own guidance, the use of Packaged Treatment Plants should not be permitted in this location

- The Environment Agency will need to license any private sewage treatment works, given that the application does not meet the EA's General Binding Rules.
- The siting of the Packaged Treatment Plants so close to the river makes them more likely to be impacted by floods and high ground water level, leading to a greater risk of failure and of raw sewage being run into the river
- The below-ground choice for the Packaged Treatment Plants seems perverse so close to the river and is contrary to usual guidance
- There is no back up facility planned to cope with breakdowns, blockages, or even with planned preventative maintenance
- There is no replacement strategy for the Packaged Treatment Plants and inevitably they will be of shorter lifetime than the development itself
- The main sewer will need a significant upgrade if the Council or Environment Agency rejects the Packaged Treatment Plants and recommends connection to the main sewer instead, as the main sewer (in the words of Wessex Water) already suffers from "hydraulic incapacity" and "ongoing vulnerability [to bursts], despite previous interventions"
- There is no indication in the application of how sewage from Parnham House and events run there will be dealt with.

The planning application should be refused on the basis of the likely environmental harm the development would do.

Introduction to the River Brit

The river Brit is 9.45 miles long, rising north of Beaminster and flowing south to Netherbury and Bridport to West Bay. It has two main tributaries, namely the river Asker and the river Simene at Bridport.

There are many seepage points entering the river from the surrounding hillsides throughout the river watercourse when the aquifers are saturated.

Historical Water Quality of the Brit

A survey was conducted in 1983 on the quality of the River Brit conditions for fish and wildlife. The species of fish recorded at the time were STONE LOACH, BROWN TROUT, MINNOWS, ROACH, CARP, PERCH etc. At the time of the survey, it was stated that the condition was healthy enough to support SALMON and SEA TROUT as well. The wildlife at the time was very healthy with OTTERS, WATER VOLES, etc.

More recent data from the Environment Agency shows that the Brit is in decline, with the scores for both fish and invertebrates both reducing in the period 2013 to 2022.

Item	2013	2022
Fish	Good	Moderate
Invertebrates	High	Good

<https://environment.data.gov.uk/catchment-planning/WaterBody/GB108044009600>

A scorecard for Clean Rivers of West Dorset (CROWD) <https://www.dorsetcrowd.com/> includes monitoring of the upper River Brit:

https://www.dorsetcrowd.com/uploads/1/4/0/0/14002490/river_brit_upper_csi_2023.pdf.

The scorecard for 2023 rates the upper Brit as “Good” though the score of 60 is just one above “Fair”. The CROWD data include the whole of 2023 but it would be reasonable to assume that they have not sufficiently monitored for sewage and pollution in this scorecard as the pollution score is a high “good” at 76.

Existing Sewage Discharges into the Upper Brit

The pumping station in Beaminster has a large holding tank for sewage. From the pumping station there is a pipe under the public road to the riverbank that lets diluted sewage into the River Brit in stormwater conditions, polluting the river. There is a further storm outlet at Hams Plot, Beaminster which lets diluted sewage directly into the river under storm conditions. Netherbury also has a pumping station and a holding tank. Once again from the holding tank there is a pipe running to the riverbank that also has a clack valve that discharges raw sewage into the River Brit in stormwater conditions.

Data released by Wessex Water (in accordance with the Environment Act of 2021) shows big increases in the sewage discharges in recent years for both Netherbury and Southgate (see Appendix 1).

Netherbury in particular is impacted by these sewage releases, with spillages of raw sewage into roads and gardens. The below photograph shows stormwater mixed with sewage close to the river in December 2023.

Wessex Water’s current (2025) [Drainage and Wastewater Management Plan for the Bridport Water Recycling Centre \(WRC\) Catchment](#), which includes Beaminster and Netherbury, says “The catchment has experienced sewer flooding due to hydraulic incapacity in the past three years.” That is, the capacity of the sewers linking Beaminster and Netherbury to Bridport is insufficient for the size of the current communities. Furthermore, no improvement work is planned by Wessex Water on this part of the network until 2040 at the earliest.

Apart from stormwater releases from the sewer, there have been 35 pipe bursts in the sewer pipes from Beaminster since 1998. There were multiple bursts in 2024 and at least one in 2025, indicating – in a response from Wessex Water – that the sewer suffers from “ongoing vulnerability, despite previous interventions”.



We would conclude that the upper River Brit

- is in decline
- suffers from regular sewage discharges (more than 1 a week on average in the past 2 years at both Beaminster and Netherbury)
- floods into Netherbury, bringing sewage into the streets.

We would also conclude that the Beaminster and Netherbury mains sewer suffers from

- Hydraulic incapacity – i.e. it cannot cope with present loads, and
- Ongoing vulnerability towards bursts

Impact of Planned Housing Development at Parnham (P/FUL/2025/06865)

The applicants have stated that their development will use a system based on large, underground “packaged treatment plants” to treat the sewage from the houses to a level that will allow it to then be discharged directly into the river Brit. We need to consider each aspect of the application to understand why the application is insufficient to be approved.

Sewage Treatment Plans in the Application

The planning application provides little evidence of clear thinking about how they propose to deal with the sewage generated by more than eighty households. Where they provide information, it is often ambiguous and/or contradicted elsewhere.

In the main Application Form, under the heading Foul Sewage, in answer to the question “Please state how foul sewage is to be disposed of.” the options for both Mains sewer & Package treatment plant are checked.

“Are you proposing to connect to the existing drainage system?” Yes, is checked.

“If Yes, please include the details of the existing system on the application drawings and state the plan(s)/drawing(s) references” Has the response – Please see the foul water drainage strategy plan within the flood risk assessment.

The Foul Drainage Strategy detailed in the Flood Risk Assessment & Drainage Strategy states “It is proposed that foul flows will discharge to an onsite package treatment plant with an outfall to watercourse.” There is no mention of connecting to the existing drainage system or main sewer.

The Planning Supporting Statement, section 5.67, states: “In view of the lack of connection to a mains sewer it is proposed that foul water flows will discharge to a self-contained on-site package treatment plant that will use biological processes to break down waste with effluent clean enough to outfall to the river after treatment is completed”.

It is not clear whether the Environment Agency’s “General Binding Rules” have been applied to this development by the applicant but it is clear that a boundary of the development area is very close to the Southgate sewage pumping station (it is just across the Bridport Road) and is therefore very close to a main sewer. The implication of this is that the PTP approach cannot meet the general binding rules of the Environment Agency and therefore requires a license from the Environment Agency.

Further, the August 2023 guidance provided by Dorset Council on PTPs says “applicants will need to satisfy the Council … that it is not reasonable to connect to a public sewer.” No evidence is provided by the applicant to assure the Council on this test and the Council should not therefore agree to the scheme.

Further, if the Council recommends that Packaged Treatment Plants are not suitable so close to a main sewer, then they must also recognise that the main sewer is not capable of taking higher volumes without a significant and rapid upgrade.

There are few details about the proposed package treatment plant to be found anywhere within the application. The Foul Drainage Strategy states “An indicative product which could be used is the SPEL PuraFluent Sewage Treatment Plant” and “The tank will be installed below ground”.

In fact there will need to be two plants, one for each side of the river, which is confirmed in several of the submitted plans. Unfortunately, the exact position of these tanks doesn’t appear to have been decided yet as they are shown in slightly different positions in different plans.

However, they are consistently shown to be positioned within 30m of the river on land which is only 3-4 meters above the river level which would suggest there is little potential to accommodate any rise in groundwater levels and possibly insufficient drop for the outfalls to operate efficiently.

The proposed housing development totals 315 bedrooms which results in a “Population Equivalent” of just under 500.

The suggested Sewage Treatment plant (SPEL PuraFluent) on the western bank of the Brit would need to be a model SPEL PF100 (Single Tank, 36,400 ltr, 7.4m len x 2.75m dia) to cope with the load from the housing on that side of the river.

On the eastern bank, where most of the housing will be, it would require a much larger SPEL PF500 (Double tanks, 40,600 ltr, 8.2m len x 2.75m dia & 80,000 ltr, 15.6m len x 2.75m dia).

In order to install either of these systems underground they will have to be in a trench at least 3m deep and a more realistic minimum would probably be 3.5m. With groundwater levels in both areas of less than 1m for most of the year (see below) this could cause considerable problems in both the installation and operation of the plant.

The position of the package treatment plants for sewage within a few metres of the river and where they will be semi-submerged by groundwater for most of the year appears to have little regard for pollution risk as any malfunction or leakage will result in rapid contamination of the river.

The high and fluctuating level of groundwater can only make this more likely as any shifting of the soft, wet, ground will put stresses and strains on the sewers and other pipework considerably increasing the likelihood of leakage.

There doesn't appear to be any detail in the submissions relating to the reconstruction of Parnham House about sewage. However, this is presumably what they refer to in the main Application Form when they say they plan to connect to the existing drainage system and the Main sewer. There is no indication that Parnham House is connected to the proposed treatment plant servicing the new housing development.

The applicants' Economic Benefits Assessment allows us to calculate a Population Equivalent value of 266 and a flow rate of 36,450 litres per day, generated by the on-site staff and hotel guests (assuming the guests have one meal a day in the restaurant).

It does not include temporary staff or visitors for the anticipated “at least one large event per month” a figure which is expected to evolve over time and to occur with increasing frequency.

As such it must be regarded as a considerable underestimation of the load that will be added to the main sewer. The consequences of this increased load can only exacerbate the problems with the failing infrastructure which is already reaching crisis point at Netherbury.

Impact of Groundwater on the Plans

The planning application includes details from two separate reports on the ground conditions and groundwater in the area of the development carried out by two different companies at different times and not fully shared between them.

The first report was drawn up in 2022 by AG Geo-Consultants Ltd (AGGC). This was followed up by a second report from Brown 2 Green Associates Ltd (B2GA) in March of 2025 who, whilst aware of the first report's existence, didn't have access to it. This second report made recommendations that there should be further investigations carried out.

The first report was revised in 2025 but it is not clear if all or any of the recommendations from the second report were carried out as the revisions were commissioned in January 2025 and the second report was not finalised until October that year.

The timing of and reliance on two unconnected reports leads to a suspicion of "cherry picking" the bits that suit the applicants where one of the reports may have turned up negative findings. A good example of this is the issue of Made Ground.

B2GA reported "The boreholes indicate made ground with a thickness of between 0.60m and 2.10m underlies topsoil [in] all boreholes, except WS2 where made ground is encountered from ground level and recorded to a depth of 0.80m below ground level (bgl).

AGGC report made ground in only one of their excavations "Made ground was only found in TPI and then it only contained brick fragments."

In their conclusion B2GA say "An extensive thickness of made ground was found to underlie the site which contained ash, brick and concrete. As such, the made ground is considered to represent a potential source of contamination that could affect groundwater quality and the proposed development"

Their recommendations include "The findings of the investigation lead us to the conclusion that further assessment may be required [and] is appropriate before the site can be considered suitable for use. The investigation should include an assessment of the potential for contaminated soil from the historical uses of the site..."

It would appear that AGGC did not investigate this further although, under the heading "Unforeseen Contamination" they say "A site investigation samples a very small portion of the overall site soils. Given the existence of made ground on the site, vigilance should be maintained during site clearance and construction".

The B2GA report investigated groundwater levels at six points across the site with two of the boreholes (WS1 & WS2) close to the suggested positions of the two sewage treatment plants. At the time of drilling (31st Jan 2025) WS1 struck groundwater at 0.4m bgl and WS2 at 0.8m bgl. Both were then monitored approximately monthly until 10th June by which time WS1 was measured at 0.77m bgl and WS2 1.55m bgl. On 25th Feb WS2 appears to have been inundated with a measurement of 0m bgl.

From 25th February continuous monitoring equipment was added to the boreholes. This indicated that WS2 was inundated for at least four days (25th - 28th Feb) and WS1 was also flooded on 26th Feb.

The report states "The wettest months of the year are typically between October and February" and the groundwater monitoring missed all but one month of this period.

Readings from the DEFRA rain-gauge approximately 500m to the south-east at Coombe Down Farm show that there was more than three times the rainfall in the six months before the monitoring period (757.99mm) than during it (236.54mm). It seems reasonable to suggest the groundwater level would be considerably higher during the wetter months.

The continuous monitoring of the boreholes was scheduled to continue for twelve months but there are only figures from the first six included in the application. The report is dated October 2025 so a further four months of readings could have been included. Admittedly this would have still missed two of the wettest months in the year but would have given a much fuller picture.

Impact of Flooding on the Plans

The major flood risk effecting the development is from "fluvial flooding", commonly known as flash flooding. This occurs when rain falls on the high, steep, hills surrounding Beaminster and is then *all* channelled through the narrow gap where the Brit exits from the town to the south.

The gov.uk Flood Map for Planning shows the area along the length of the river as it runs through the housing development is rated as either Flood zone 2 or 3 with the northern half being largely Zone 2 and the southern half Zone 3. Zone 3 represents a 1-in-30-year risk of flooding; Zone 2 is a 1-in-100-year risk.

This is important because being in Zones 2 & 3 means the development would need to pass both the Sequential and Exception tests to gain approval - which is unlikely in this case. The housing development would almost certainly fail the Sequential test because there are "reasonably available, lower risk sites, appropriate for the proposed development".

By simply moving the houses planned for the western bank of the Brit (and possibly one or two at the northern end) to the southern end of the development, nearer to Parnham House, they could move them out of Zone 2.

The Environment Agency's online Flood Map for Planning was updated in August 2025 and the map is annotated with "Flood zones 2 and 3 have been updated to include local detailed models, and a new improved national model."

However, consultants employed by the Parnham Estate challenged the previous EA flood map (Apr 2024) using their own modelling of the flood risk which has apparently been accepted.

It seems perverse if, in an era of increasing flood risks across the UK due to climate change, parts of the area affected by this housing development should be downgraded from a 1-in-30 year risk to a 1-in-1,000 year risk when neither the terrain through which the river flows nor the upstream catchment area have changed.

Conclusion

The consequences of any unforeseen or accidental discharge of the sewage from more than 80 houses in this location would be catastrophic and it could affect the whole of the River Brit running from Beaminster south to the sea at West Bay.

Therefore, it would seem vital that the plans for this aspect of the development should be well worked out, tested and approved before the development is allowed to proceed. Unfortunately, that is not the case.

The package treatment plants have not been specified and even their location varies according to which plan you consult. This would seem to be indicative of the level of thought that has gone into this aspect of the development with nearly everything “To be determined at detailed design stage”.

Placing sewage treatment tanks with a combined capacity of 157,000 litres, semi-submerged by groundwater for most of the year, within a few metres of a river which even the applicants own modelling says is subject to a risk of flooding seems like a major pollution incident waiting to happen.

It is curious that the consultants who compiled the report on groundwater had no further input after it was submitted – not even the inclusion of further, automated, groundwater level measurements that were due to continue for several months after the report was submitted. The report also noted the existence of made ground underlying the site representing a potential source of contamination that could affect groundwater quality and the proposed development which they had found in the cores excavated for their boreholes.

They were not invited to follow up on their recommendation that this required further investigation and instead a three-year-old report from another company was revised with barely any mention of the made ground which their own excavations with mechanical diggers had failed to reveal.

The lack of any detail about dealing with foul water from the reconstructed Parnham House is worrying. If it is to be added to the main sewer that will place a heavy additional load on the infrastructure in Netherbury and can only lead to an increase in the number and duration of the occasions when sewage is dumped directly into the River Brit.

If this is not their intention, what do they plan to do with it?

Appendix 1 Sewage Discharge Data

The Environment Act of 2021 required Wessex Water to release data for how much sewage they discharge into our rivers which has given us the chance to monitor what's been happening at the Combined Sewage Outlet (CSO) at the Netherbury pumping station and at the Hams Plot and Southgate storm overflows in Beaminster

Discharge History (number of discharges per year, which approximately equates to how many days saw discharging activity, regardless of duration)

Where	2021	2022	2023	2024	2025 to end July
Hams Plot	16	7	10	8	3
Southgate	56	43	79	69	23
Netherbury	33	39	82	79	19

Discharge information

Where	Treatment	What's getting in the sewer to cause discharge	High spill frequency primary reason	Other observations
Hams Plot	Diluted	Rainwater	-	-
Southgate	diluted and partially treated	a combination of rainwater and groundwater	hydraulic capacity	Sewage litter present Water Quality Modelling shows that the WFD Status Class at the 99%ile level for BOD and Ammonia is High 'with' or 'without' all Bath FSOs
Netherbury	diluted and partially treated	rainwater	Exceptional weather	-

As can be seen in the Discharge History table above, the figures for 2023 and 2024 at both Southgate and Netherbury show a big increase over previous years.

Wessex Water explain the “*High Spill Frequency*” at Netherbury by “*Confirmed exceptional weather*”. We can compare the discharge events at Netherbury with rainfall that has been measured since 2008 at an automatic DEFRA rain gauge, situated in the Upper Brit catchment area at Coombe Down Farm, between Beaminster and Netherbury. It is approximately 500m from the proposed development at Parnham and 1.5km from the pumping station at Netherbury.

Discharge events at Netherbury compared with rainfall

	2021	2022	2023	2024
Discharge events	33	39	82	79
Discharge Hours	292.90	368.88	1076.13	853.83
Rainfall (mm)	1092.80	994.43	1488.83	1394.30

The same rain gauge gives the average annual rainfall as 1081mm. So, 2021 had “typical” rainfall but the rainfall in 2024, which showed a 27% increase over 2021, apparently caused a 191% increase in the number of hours that sewage was pumped into the Brit at Netherbury. 2023 had a 36% increase in rainfall, compared to the “typical” 2021, which apparently accounted for the 267% increase in sewage discharging at Netherbury. This does not seem to be logical.

At Southgate, there was a high rate of spill even in drier years and for Southgate, the rationale for the high spill frequency is “hydraulic incapacity”. Hydraulic incapacity is when the drainage network cannot convey the runoff from heavy rainfall and can lead to sewer flooding. It can be exacerbated by groundwater or other inflows such as surface water entering the sewer system. Wessex Water’s current (2025) [Drainage and Wastewater Management Plan for the Bridport Water Recycling Centre \(WRC\) Catchment](#), which includes Beaminster and Netherbury, says “The catchment has experienced sewer flooding due to hydraulic incapacity in the past three years.”

Report F – Benefits Report

1. This Report analyses the purported benefits claimed by the Applicant in relation to the ED Application.
2. The purpose of the Report is to demonstrate to the Council why those purported benefits are not in most cases actual benefits and how they cannot be claimed to outweigh the disbenefits.

Introduction

3. When considering what benefits are expected to arise from the proposals, it must be remembered that this scheme is primarily designed to create a private family home with occasional hospitality use.
4. The test in para 221 NPPF is that an application for planning permission for ED should not be approved unless the benefits outweigh the disbenefits.
5. In the context of the disbenefits arising from the Application / ED – in particular the significant adverse impacts on the National Landscape, the registered park and garden, Parnham House itself, the loss of Priority Habitat and other ecological issues (as well as other matters), this is a very high bar. This bar is set not only in para 221 of the NPPF but also
6. This is recognised in para 20 HE GPA4:

“Even when it is clear that enabling development is the only way to secure the future conservation of the heritage asset, a decision-maker will still need to assess whether the heritage and any other public benefits it would secure would outweigh the disbenefits of departing from planning policy (NPPF, paragraph 202). Considerations in that assessment will include the importance and significance of the heritage asset(s), the nature of the planning policies that would be breached, the severity of the breach or breaches, whether the asset(s) have been subject to deliberate neglect and giving great weight to the asset’s conservation (see NPPF paragraphs 184 to 202).”

7. It is a material consideration that the Application acknowledges (Planning Supporting Statement 6.9.9) that the benefits associated with the Parnham House Works are not sufficient by themselves to outweigh the disbenefits to the House, registered park and garden, and protected National Landscape, although it does not go on to address any further potential disbenefits. There is therefore a “benefits gap”.
8. The Application therefore relies on a number of asserted economic benefits (including the provision of housing) and other purported benefits (such as ecological improvements which do not require an application for planning permission, or public access, about which there is no information) as tipping the balance in favour of granting planning permission.
9. There is no analysis in the Application documents weighing those asserted benefits against the clear harms. Closing the “benefits gap” relies in large part on economic modelling alone to make a case. Whilst economic modelling may be informative, it is not sound to rely on the assumptions becoming reality. They are only predictions at best, and cannot be relied upon to actually occur. The benefits gap is not therefore closed.
10. Given the significance of the harms and the weakness of the benefits, DNHI does not consider that the balance is tipped in favour of granting planning consent: the disbenefits will still outweigh the benefits.

Key Issues

11. The Application Documents set out the public benefits (ref Planning Statement Executive Summary vii. & vii. and paras 6.99–6.105, and in an Economics Benefits Assessment (EBA)).
12. It is a material consideration that the Applicant (see Planning Statement 6.99) acknowledges that “**the public benefit of restoring Parnham House does not by itself decisively outweigh the adverse impacts of enabling development** of the listed building, historic park and the surrounding landscape”.
13. It therefore seeks to demonstrate that the other purported benefits do so.
14. These benefits are claimed as being:
 - a. Enhancement of the site as a historical, cultural, educational and ecological asset with greater public access.
 - b. Direct and indirect benefits to the local economy resulting from the works to the House and construction of the ED.
 - c. The provision of new homes, meeting a Dorset’s five-year housing land supply requirements.
 - d. The environmental sustainability aspects of the proposals.
 - e. Direct and indirect benefits to the local economy resulting from the future operation of Parnham as a private home with hospitality offering, and the new residential development.
15. It is a material consideration that the identified funding gap for the proposals means that the Conservation Works Scheme may not be deliverable, partially or in whole. This means that delivery even of any benefits related to the Parnham House Works may be at risk.

A historic, cultural and educational asset

16. Nowhere in the Application Documents is it explained what is the cultural or education value – as a benefit – of the proposals. This seems to be a simple assertion without any evidence, or any defined plan to deliver such claimed benefits.
17. Whilst the s106 HoTs refer to a public access strategy, no document is provided that sets out what this strategy will be. It does not seem to be covered elsewhere in the Application except with vague statements.
18. It is not clear how a private house, with occasional hospitality use, and which will not be open to the public (or only on a charging basis) can be considered to be a cultural attraction with a public benefit. We do not comment on this further given the lack of information but clearly no weight can be given to this assertion.

Environmental Sustainability

19. DNHI commissioned a Sustainability Statement Review by Ridge to examine the sustainability claims made in the Application Documents. This is provided as Report G. In summary:
 - a. it is evident that in a number of key respects the ED Application and the LBC Application do not meet the sustainability requirements of the Dorset Local Plan and other relevant policies such as:
 - i. The removal of over 3Ha of high value habitat – contrary to ENV2.
 - ii. An increase in the impermeable area of the site by 25% – contrary to ENV5.
 - iii. The risk of accidental discharge of foul water and sewage into the River Brit -- contrary to ENV9.
 - iv. No alignment with BREEAM – contrary to ENV12.
 - b. The Ridge Consultant's Sustainability Statement Review analyses claims made in the Sustainability Statement, including:
 - i. Key details of the ED that relate to sustainability are not provided now and will be left to the detailed design stage. This is inappropriate as key details such as PV array sizing and thermal modelling are fundamental to the design and functionality of the development: they directly influence building orientation, massing and sizing and cannot be deferred until after planning consent.
 - ii. The assertion that ASHPs will meet 100% of the ED units' energy demands is incorrect. ASHPs only provide heating and hot water. The electricity consumption requirements of the units are ignored. There is no appraisal of what capacity exists or whether upgrades are required to the DNO's network (at cost to the developer).
 - iii. The provision of EV chargers and promotion of EV use also relies on securing sufficient capacity from the DNO. There is no information on this.
 - iv. The Application does not include any assessment of water quality and ecological risks resulting from accidental discharge of foul and surface water

from foul/sewage treatment plants into the River Brit. It is not shown that the use of onsite waste treatment plants is viable in terms of acceptable water quality and associated risks. There is no detail on how these risks will be managed in future through maintenance and renewal of infrastructure.

- c. The claims of green and blue infrastructure as being an important part of the ED, including the retention of trees (but the removal of a significant number of others), a natural swimming pool, rain gardens and water butts, and “enhancements” to the River Brit ignore the fact that a significant area of existing ecological habitat will be destroyed, and also disturbed during construction. There will be no replacement of these habitats.
- 20. Further information is provided in the Sustainability Statement Review. This includes a “sustainability checklist”. Overall, the sustainability claims are not strong and should not be considered benefits.
- 21. Compliance with building regulations is not a benefit.
- 22. In relation to the claimed **ecological benefits** (see also the Ecology Impacts Report:
 - a. Delivery of the enhancements that the Applicants are keen to provide for the whole of Parnham Park and the Millground do not require that any development takes place, or an application for planning permission. They can be delivered without either.
 - b. Ecological enhancement cannot be framed as a benefit of a scheme which involves the permanent destruction and loss of existing priority habitat and the other consequences on the ecology of the area. Natural England (in its response 24 December 2025) casts doubt as to whether the loss of 6.4 hectares of existing protected / priority habitat cannot be off-set by improvements within Parnham Park and suggests that compensatory habitat is required. This would have to be off site, and would therefore not be directly beneficial.
 - c. Biodiversity net gain (BNG) is not a benefit: it is a statutory framework to ensure that the irreparable loss of habitat from development is off-set, with improvements. As made clear in the Council’s pre-application response of 12 December 2024, “*BNG is a way of creating and improving biodiversity by requiring development to have a positive impact (‘net gain’) on biodiversity*”. BNG is therefore required to be delivered as a result of the ED. It is mandatory and cannot therefore be considered as a benefit; it is a requirement. The Application Documents indicate that offsite biodiversity units will need to be utilised. If BNG is not to be delivered on site (in whole or in part), it must be delivered elsewhere, which would not be directly beneficial to the location of the ED / Parnham Park and surrounding area.
- 23. The destruction and loss of ecological habitats (including priority habitat) – permanent and irreversible – through development is a clear disbenefit that cannot be outweighed by these mechanisms.

New housing

- 24. Dorset has a need for new housing provision, as set out in the Local Plan. Sites have been allocated to help meet that need in Beaminster, to the west of the town. Parnham Park is

not an allocated housing site. It is not suitable for allocation because it is a registered park and garden, would give rise to unacceptable impacts on the protected landscape, and its status as a priority habitat and other ecological impacts, including the nearby SNCI.

25. Ordinarily, an application for planning permission for new residential in this location would be refused even if it were shown to help meet the identified housing need.
26. In any case, the claim that the ED will help meet that need, and is therefore a benefit of the proposals that outweighs the disbenefits, is weak. The Application does not explain how the ED will meet the actual housing need, other than by providing houses. We do not see how it can be seen to meet that need.
27. In this respect:
 - a. The assumed sales prices for houses in the ED range from, £600k, £1.25m and £2-2.3m. It is not demonstrated how this meets the mix of housing needs. Nil affordable housing provision is proposed;
 - b. Average house prices for Dorset are £387,000. Average prices for new build homes in Beaminster is £400,000;
 - c. A gated community at premium prices is unlikely to meet the additional housing need and mix identified by the Council through the Local Plan process; and
 - d. Built over three years, the ED only adds 0.8% of Dorset's target per annum, or one thousandth of its 17-year target;
 - e. Three to four flexible settlements for example, in less sensitive locations, would deliver the same provision without the clear disbenefits;
 - f. The Applicant proposes **nil provision of affordable housing**; and
 - g. The apparent attempt to avoid CIL will undermine provision of local services and infrastructure needs relative to the ED.
28. In respect of **affordable housing provision**, the Council's 21 December 2022 pre-application response referred to the Council's affordable housing policy requirement HOUS1 and set out that provision below 25% affordable housing units is only permissible "*if there are good reasons to bring the development forward and a financial viability assessment shows that it is not economically viable to make the minimum level provision being sought. Justification for provision of nil affordable housing would still need to be demonstrated.*" This is not demonstrated in the Application Documents. It is just assumed as nil provision.
29. The December 2022 letter goes on to say, "*provision of nil affordable housing would reduce the public benefits compared with a proposal that provides some level of affordable housing. Policy conflict would need to be balanced with the disbenefits of the proposal*".
30. If anything, nil affordable housing should be considered a disbenefit. It undermines the assertion that the provision of houses through the ED is a benefit by failing to reflect local housing needs.
31. In respect of **CIL**, it is an extraordinary proposition that a development of luxury homes in a gated community should be offered an exemption to the statutory charge. The ED is no different from any other housing development in Dorset in that it will give rise to local infrastructure needs that developers are expected to fund. A development of luxury homes should be expected to address those needs through CIL, in the normal way. If not, these

would need to be funded from elsewhere: either from council tax payers, central Government, or other developers.

32. The Council should have regard to the fact that there is **no assessment of the impacts of 82 new dwellings on local infrastructure**. It is not established that non-payment of CIL is justified in terms of such infrastructure; nor is it demonstrated that CIL should not be paid for reasons of viability. It is just omitted from the ED Appraisal.
33. The assertion that this will be discussed in due course with the Council is not sufficient. If there is a real possibility that CIL would not be paid, it must be explained as part of the Application process, and the disbenefits of not paying CIL must be properly assessed, including how such infrastructure needs would be funded instead.

Construction works

34. The EBA claims a potential benefit of £10m per year arising from the construction phase. It is not clear how this figure is arrived at. In any case, economic benefits associated with construction activity are by their nature temporary and limited and are corollaries of development activity. They are rarely if ever a reason in themselves to grant planning permission.
35. The information in the EBA suggest that the site would employ less than 1% of the locally based Dorset construction workforce. Spread over three years the site would represent less than 1% of the 3,246 annual housing completions required by Dorset's new Local Plan.
36. There is no shortage of current and prospective construction work in Dorset. If workforces are drawn from the local area (or even wider Dorset and adjoining counties) with a permanent local residence, their spending in the local economy (which is where the Savills EVA is derived from) is already established and will not change as a result of working at Parnham rather than any other site. There would therefore be no net gain to the Dorset economy.
37. The Applicant could take credit for new economic activity resulting from the ED construction if it was of a scale and duration that pulled in workers from outside the area. The ED is – in construction project terms – small, including for Dorset. Parnham cannot take credit for established economic activity.
38. The individuals who might come and go for work at the ED and Parnham House sites would be working somewhere else if they were not working at Parnham. The applicant cannot claim credit for the established spending patterns of these individuals in the local economy.
39. The Application Documents do not address any potential short-term negative impacts of construction activity.
40. Construction activity is not a benefit, is certainly overstated as being so, and is not a reason to approve the Application.
41. To the extent there is any marginal benefit, it cannot be said to outweigh the disbenefits; it will be temporary but the disbenefits will be permanent. It is certainly not a reason to carry out development on this site contrary to relevant planning policies.

42. To attempt to assert so has no sound planning or public policy basis.

Future benefits from private house and hospitality offering and ED

43. At the heart of the Application is the proposal to recreate a private home in Parnham House. A private home is not ordinarily considered to deliver public benefits, including economic benefits.
44. The Applicant relies on asserting that the “hospitality offering” and the residential units in the ED will deliver economic benefits to the local economy, supply chain and skills.
45. The EBA claims that long-term the completed private home/hospitality business will generate £6m per annum in the local economy. The numbers are highly conjectural – even Savills assign to them a margin of +/- 20%. The hospitality business is effectively a start-up several years away in an uncertain future. No analysis is provided as to the potential risks related to such a business, affecting materialisation of assumed benefits.
46. As noted in Report A, there is a significant amount of uncertainty as to what exactly the future “**hospitality offering**” will be. There is no trading history available for such a business and it is ill-defined; there is no detail in the Business Plan on the nature of the operation, occupancy, or revenues. In turn, this undermines the credibility of the claims that the hospitality offering will deliver economic benefits and also makes it impossible to quantify what those benefits might be. In turn, the asserted economic benefits of the future “hospitality” offering must be seen as equally uncertain and unquantified.
47. There is no assessment of displacement of tourism activity i.e. from existing hospitality businesses in the area.
48. The Council should also have regard to the fact that the asserted benefits from the hospitality offering include those associated with the operation of the extant consents for the lodges and other holiday accommodation, which are not part of the ED. As such they cannot be said to relate to the Application or the LBC Application.
49. There is also no certainty that the “gradual introduction” of the hospitality offering will occur as it relies on additional funding; and the Applicants have not built out and started to operate in full the various planning permissions enabling them to start operation of a hospitality offering.
50. In relation to **skills**, there is no detailed analysis of the actual employment and skills needs for Beaminster and the surrounding area, which is needed in order to demonstrate that jobs at Parnham would deliver any skills benefit. In fact, hospitality and concierge roles are typically lower-paid and lower-skilled. In addition, many of the employment roles will be seasonal and related to one-off events, temporary, and at the lower end of the salary and skills scale.
51. It is not clear how many of any new jobs would benefit Beaminster, which bears the brunt of the public disbenefits of the proposal. Anecdotally, hospitality businesses in Beaminster already struggle to find staff.

52. Regarding the **supply chain**, the relevant supply chains are not identified and there is no evidence that they will be local, and therefore benefit the local area. Generic multipliers are used, which should be given limited weight.
53. There must be doubts about the level of additional visitors or residents which the relatively small town centre of Beaminster could realistically absorb without a loss of quality of life for the existing residents. There is no analysis of potential downsides, or how those would be appropriately managed.
54. Certainly, the development and occupation of a private home (even with some form of hospitality offering) cannot be considered to bring wider economic benefits. This is the Applicant's stated primary purpose of Parnham House.
55. In any event, the possible future economic benefits are of academic interest only if the scheme cannot be financed and delivered in its entirety.

Conclusion

56. DNHI submits that:
 - a. Very limited weight if any should be given to the "benefits" asserted by the Applicants.
 - b. To the extent any of these are genuine benefits, they do not outweigh the obvious and significant disbenefits arising from the ED.
 - c. The tests of para 221 NPPF are not satisfied.

Report G – Ridge Sustainability Statement Review

RIDGE

PARNHAM PARK, BEAMINSTER

SUSTAINABILITY STATEMENT REVIEW

05/01/2026



PARNHAM PARK, BEAMINSTER

23/12/2025

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1. INTRODUCTION

This report has been produced by Ridge & Partners LLP, on behalf of Dorset Natural Heritage Initiative (DNHI) to review the Sustainability Statement submitted for the Parnham Park development (planning ref P/FUL/2025/06865).

The Parnham Park development has been prepared to address Dorset Council (DC) policies including but not limited to:

- Sustainability Statement and Checklist for Planning Applications (Dec 2023)
- Listed Buildings and Energy Efficiency (Dec 2023)

This Sustainability Statement review will set out the information that has been provided within the Sustainability Statement prepared by DHA Architects in October 2025 on behalf of Parnham Estates and provide a commentary against each paragraph in turn.

This Review aims to summarise and ascertain whether the proposals align with the requirements of DC, noting areas of non-conformity, ambiguity along with suggested improvements.

We had adopted a 'traffic light' system to identify clearly where the Sustainability Statement:

Green	Compliant with DC Policy Requirements
Orange/Amber	Partially compliant with DC Policy Requirements
Red	Insufficient information or non-compliance with DC Policy

2. THE ENABLING DEVELOPMENT

DHA SUSTAINABILITY STATEMENT	RIDGE REVIEW
2.1 The enabling development houses have been designed with a fabric first approach, ensuring high levels of insulation performance throughout the envelope to keep heating loads to a minimum, supplemented by low or zero carbon technologies such as air source heat pumps throughout, photovoltaic panels to appropriate roof pitches and mechanical ventilation with heat recovery.	The Fabric First Approach is part of the nationally recognised principles for seeking zero carbon developments
2.2 Design stage SAP assessments of a sample of small and large house types across the development have been undertaken, demonstrating Part L 2021 compliance would be exceeded by 87% and the expected figures for the Future Homes Standard would be exceeded by 49%. Calculations are included in the Sustainability Report in Appendix B.	<p>The calculations which are contained within the Appendices don't include a summary which could be used to determine the level of improvements over Building Regulations which is stated. It is unclear how these numbers have been reached and whether this is an aggregate across the whole of the enabling development.</p> <p>In addition, it is stated that the ASHP will meet 100% of the houses energy demand. This is not the case as ASHP only provide heating and hot water, the electricity demand would need to be dealt with through other means such as PV panel, which it is noted that each house is provided with 6no. panels.</p>

	<p>It is not clear if 6 panels per house would be sufficient to provide all of the electricity demand, and there is no mention of demand side response systems or battery storage.</p> <p>Further to this, upon a review of individual house type drawings provided within the planning pack and the site masterplan it would appear that there are a significant number of house types (A1, A2, A10, B1-B4 and E2) which are shown to have PV Panels orientated northwards dramatically limiting the panels efficiency.</p>
2.3 Although the technical design of the buildings is not fully detailed at this stage, the properties would be capable of being constructed either as traditional load-bearing masonry or utilising an off-site fabricated insulated timber structural frame, clad on site in traditional materials. In either case, reduction in waste during construction will be a key consideration in the design and construction of the buildings, by designing using standardised modules requiring less cutting and waste (where not detrimental to the design of the buildings and their heritage and contextual impact) and through the rigorous implementation of a site waste management plan.	<p>This planning application has been submitted as a full planning application, therefore not know the construction approach or materials is unusual</p> <p>This being the case, it casts doubt on the robustness and validity of the prepared SAPs</p> <p>Although there is mention of waste being a consideration there are no targets set regarding the amount of waste arisings, or the utilisation of Circular Economy Principles.</p>
2.4 Guidance from the BRE's 'Green Guide to Specification' will be a starting point for comparing and benchmarking material and construction choices, with more in-depth analysis from more recent tools to enable consideration of embodied / whole life carbon.	<p>The legal requirement for a SWMP was withdrawn in 2013, therefore although there remains a duty of care with regard to managing waste, without appropriate targets set for generation and diversion from landfill there is no requirement to go above and beyond the base level.</p>
2.5 Where appropriate and possible, locally-sourced materials will be used for roofing tiles, facing bricks and	<p>BRE have formally stated that <i>"Since 2018 our BREEAM schemes no longer award any credits for Green Guide rated materials and as such we have made the decision to decommission the Green Guide. This will take effect from the 26 January 2026"</i>. Therefore there is almost no opportunity to use this method, which BRE themselves confirm has not been updated formally since 2021 and therefore the information is outdated and well below current industry standard.</p> <p>Instead, Whole Life Carbon Assessment or Life Cycle Analysis should be conducted to enable a true estimate of carbon within the proposed development. We would also propose independent, 3rd Party verification be used to support sustainable material and construction choices, such as using the BREEAM Residential assessment method. This approach would incorporate wider materials assessment such as Environmental Product Declarations which are a common industry wide approach as well as materials efficiency, resilience and adaptation studies</p>

<p>stonework, with any material being subject to rigorous authentication of environmental product declaration performance.</p>	<p>BREEAM Residential assessment ensures material sourcing and transport distances are addressed within its methodology. The use of EPDs is both supported and recognised by the BREEAM Residential scheme.</p>	<p>2.6 EV ownership will be encouraged with chargers installed to each property, a proposal which also covers the recommendations set out in the submitted air quality screening assessment.</p> <p>From the documents provided it is unclear whether a utility appraisal has been undertaken to establish whether there is sufficient capacity in the network to allow for the provision of 82 EV chargers along with the other associated infrastructure of the proposed dwellings themselves.</p> <p>The energy demand of EV charging adds a significant load to new developments, but this demand can be effectively managed through smart charging infrastructure and strategic planning, however the Sustainability Statement states that '<i>this will be dealt with prior to construction</i>' which is not an acceptable position.</p> <p>It is also unclear as to whether the 6 proposed PV panels would be sufficient to meet the electrical load of each dwelling or whether this has been excluded.</p>	<p>This is in accordance with Building Regulations Part G for a development in an area of water stress, with the calculations provided showing a specification that would meet this consumption.</p> <p>We would seek to include a planning condition that required a Part G report including details of the specified sanitary fittings to be provided prior to start on site to ensure that the water consumption is achieved and to maintain this throughout the lifetime of the property.</p>	<p>2.7 Expected water usage has been considered and a target of 110L/person/day can be achieved across the development using readily available sanitaryware products.</p>	<p>No consultation has taken place with Dorset NET at the time of the application.</p> <p>The submitted Biodiversity Net Gain Statement (May 2024) states that the site will need to make use of offsite biodiversity units, which seems in direct conflict with the details contained within the Sustainability Statement.</p> <p>Furthermore the BNG states that habitats of High or Very High value will be lost during the development, which again is in direct conflict with the Article 37A of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that requires developers to avoid adverse effect to on-site habitats of Medium or above value.</p> <p>The Ecological Impact Assessment states that 3.44ha will be lost due to the planned development.</p>	<p>2.9 Surface water drainage will be dealt with by way of a sustainable drainage system, whereby all surface water will be collected and conveyed to balancing ponds before discharging to the River Britt in a controlled manner. Foul drainage will be dealt with by way of on-site packaged treatment plants, with clean treated discharge discharging eventually to the River Britt. A full drainage strategy is included as part of the application.</p>	<p>The description to how the BNG improvement will be reached is via 'a commitment to manage retained habitats' does not suggest that there will be replacement of the lost habitats.</p> <p>There is also some confusion over what the proposals for improvement include as it is suggested that these will take place outside of the redline boundary in the wider Deer Park setting, yet the baseline value of this park is not contained within any of the calculations provided.</p> <p>There is an increase in the impermeable area of the site which equates to almost 25% of the total red line boundary. The suggested SUDs measures are minimal and largely ineffective such as water butts and infiltration via the gardens being proposed.</p> <p>There are no public surface water sewers within the immediate vicinity of the site and therefore it is proposed that surface water will drain into the River Britt, it is unclear if this has been established as a viable position, especially given the Biodiversity Character status of the river itself and it being categorised as having County level importance.</p> <p>The intention to use onsite waste treatment plan which will eventually discharge into the River Britt would need to be further investigated for viability in terms of acceptable water quality.</p> <p>The proposal includes for the SUDs features and drainage systems to be managed by a private company. This company is to be paid for by future residents who are also required to sit on the board of said company. This is a highly unusual position as it is unclear how this will be facilitated and explained to future residents of their responsibilities.</p>
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3. THE LISTED DEVELOPMENT

DHA SUSTAINABILITY STATEMENT	RIDGE REVIEW
<p>3.1 Much of the façade of the listed building remains in tact, for the time being. Subject to further investigation and survey work, it may also be possible to salvage some of the stonework which has fallen from the facades into the building, although until such time as planning and listed building consent is granted and the elevations can be physically secured and made safe it is impossible to say with certainty how much of the archaeological remains from the facades can be reused. Where facades are to be restored and returned</p>	<p>This statement is vague and appears entirely predicated on obtaining planning consent and then reviewing the options available.</p> <p>The preferred position would be a permit to be applied for that would enable a comprehensive review of the structure and its component materials to establish the quantities which can be reused.</p>

to their pre-fire appearance, this will be with the use of local oolitic limestone (Ham stone).		
3.2 Where the financial model allows spaces to be fully-fitted out, this will include the introduction of hemp fibre insulation to the internal face of the external walls, a natural, sustainably sourced product which is breathable and suitable for use in historic buildings such as this.	<p>This statement appears to suggest that certain remedial measures will only be carried out due to financial viability, however, it is not clear is how this position will be reached, the scales of the insulation to be installed, and the performance of said insulation, especially as the use of the fully fitted out spaces has not been identified</p> <p>There also seem to be a direct conflict between financial viability and the use of hemp insulation.</p> <p>Hemp insulation is more expensive, not easily available, difficult to install, sensitive to moisture and has a worse performance than other more widely available and equally sustainable choices. A report into the cost benefit analysis of using hemp insulation should be provided, we would recommend the use of Life Cycle Costing approach to formally ascertain the most appropriate insulation type over the building lifetime.</p>	
3.3 Where it is proposed to restore a small portion of the façade using modern materials where the level of fire destruction to the facades was most damaging, the Nash Dining Room, this will be with frameless double-glazed units, which will offer a better thermal performance than if the wall were to be rebuilt in solid masonry.	Noted, the main purpose of the proposed works is to stabilise the ruin with structural repairs, carefully dismantle and rebuilt areas of high-level masonry, re-roof and re-fenestrate the building to secure it from wind and water, and return part of it to a fully restored state.	
3.4 Roofs will be rebuilt and will be fully insulated to close to modern standards, using wood fibre insulation, a breathable and sustainable material.	<p>Please refer to responses for 3.2 & 3.3.</p> <p>It is assumed that Heritage England will provide formal advice on the appropriate building materials given its Grade 1 listing.</p>	
3.5 The restored building will be heated with a reinstated system of radiators, fed from replacement efficient gas boilers. Consideration was given to the introduction of feeding the radiators from a heat pump (ground, air or water source) however given that the works are being funded by enabling development (which requires the works are the minimum necessary), the costs of a heat pump were considered beyond a level which could be supported by the enabling development. Nevertheless the system will be designed to allow a heat pump to be added in the future, should technological advances make its use economically viable.	<p>Converting from traditional radiators to heat pump-compatible systems is costly, as radiators operate at ~75°C while heat pumps run at ~40°C, likely requiring full radiator upgrades—a significant capital expense."</p> <p>We would recommend exploring the feasibility of a site-wide heat network serving both enabling and restoration phases.</p>	

4. SUSTAINABILITY CHECKLIST

DHA SUSTAINABILITY STATEMENT	RIDGE REVIEW
Reducing energy consumption and operational carbon	The target space heating requirement within the checklist for residential buildings is 35 kwh/m ² /yr

	This would appear to be met within the calculations provided.
	The proposed development also includes an element of non-residential space in the form of holiday lodges and leisure buildings. No calculations or assessment of these buildings is included
	The amount of PV to be incorporated into the development has not been formally established nor has this been compared against the electricity demand of the houses – calculations are required to justify
	The risk of overheating in the dwellings has not been considered within the application. Section 9.3 contains high level information on what needs to be done, but there has been no modelling conducted to confirm compliance and there is no confirmation of what is being deployed in each of the homes to limited the risk – calculations are required
Maximising the use of sustainable materials and cutting embodied emissions	The paragraph which is referenced as compliance is the incorrect (should be 2.4). Even notwithstanding this there is no detail provided of the materials which are to be used and their ratings. Furthermore, it is expectation that the sustainability consultants would be well aware that the Green Guide is outdated and that the industry wide method of examining embodied emissions is through LCA modelling
Minimising waste and increasing recycling	<p>There is mention made of the need for a SWMP but not indication is given to the types and volumes of waste which is to be generated as a result of the development</p> <p>No details are given to the location and access route to the bin stores. There is no information provided regarding drag distances, prevention of rodents, vehicle tracking for collections or the internal storage requirements</p>
Conserving water resources	<p>A calculation has been provided which demonstrates the potential water usage is less than 110 l/p/d</p> <p>The latest National Standards for Sustainable Drainage Systems states that "<i>rainwater harvesting shall be considered in all circumstance where any of the following apply:</i></p> <ul style="list-style-type: none"> - <i>There is a demand for non-potable water</i> - <i>There is a need for landscape irrigation</i> - <i>The development is in an area of water stress</i>"
	<p>In addition, the standards requires appropriate evidence to be provided that demonstrates that the methods have been used to the maximum extent practicable, and that higher cost alone is not a suitable justification.</p> <p>Given the almost 25% increase in impermeable area as a result of the development, the deployment of rainwater harvesting system would seem like a sensible position to help reduce the peak rates of run-off</p>

Incorporating green and blue infrastructure	<p>The BNG report states that habitats of High or Very High value will be lost during the development</p> <p>The Ecological Impact Assessment states that 3.44ha will be lost due to the planned development.</p> <p>No consultation has taken place with Dorset NET at the time of the application.</p>
Sustainable Drainage	<p>There is a 25% increase in the impermeable area which will result in increased overland flow and less infiltration than pre-development rates.</p> <p>The proposed system relies on infiltration through gardens as well as basic SUD choices.</p> <p>The intention to use onsite waste treatment plan which will eventually discharge into the River Britt would need to be further investigated for viability in terms of acceptable water quality.</p> <p>The proposal for the SUDs features and drainage systems to be managed by a private company, paid for by future residents who are also to sit on the board of said company is not a welcome position, as it is unclear how this will be facilitated and explained to future residents of their responsibilities.</p>
Adaptation to climate change	<p>No reference to adaptation to climate change or what measures have been incorporated into the can be found in the documents, thus indicating that these have not be embedded in the development as proposed.</p> <p>No thermal modelling to manage overheating risk against future climate scenarios has been undertaken</p> <p>There are no green roofs, there is a loss of vegetation and trees, the majority of buildings are orientated south east/west however there does not seem to be any thought given to solar gains, or the location of rooms within the dwellings maximising the benefits of alternative orientations</p>
Sustainable Travel	<p>A Transport Assessment has been submitted as part of the application, but no details of this have been included within the sustainability statement.</p> <p>The TA concludes that there are a range of facilities which are within the upper reaches of acceptable walking distance (2km) and that the only public transport is located in the centre of Beaminster</p>

5. POLICY ALIGNMENT

The closing paragraph of the Sustainability Statement (paragraph 4.7) states that *"Through careful material selection, energy-efficient design, water and waste management, and biodiversity enhancement, the development supports Dorset Council's climate change and sustainable construction objectives. The project therefore represents a balanced and responsible model for enabling development – delivering substantial heritage, environmental and community benefits within a coherent sustainability framework."*

Dorset Council declared a climate emergency in 2019 and released their first Natural Environment, Climate and Ecology Strategy in 2021 which set the direction for development with the county. As this development is stated to be delivering benefits within a coherent framework it is alarming that there is no reference to the adopted strategy or its aims within the entire sustainability statement.

Within the West Dorset, Weymouth and Portland Local Plan there are a number of policies which relate to sustainability and sustainable development, these do not appear to have been identified and addressed adequately within the Sustainable Statement submitted as part of the planning application.

Examples where this is the case include:

POLICY WORDING	NON-CONFORMITY
ENV2 v) Proposals that would result in the loss or deterioration of irreplaceable habitats, such as ancient woodlands and veteran trees, will be refused unless the need for and public benefits of the development clearly outweigh the loss.	There is no rationale provided which defines the need to remove over 3ha of high value habitat
ENV5 ii) In assessing proposals for development in an area with a medium or higher risk of flooding, the council will need to be satisfied that: • there are no reasonably available alternative sites with a lower probability of flooding (where a site has been allocated this test will have been satisfied) adequate measures will be taken to mitigate the risk and ensure that potential occupants will be safe, including measures to ensure the development is appropriately flood resilient and resistant; and • safe access and escape routes are provided where required.	<p>The proposed development will increase the impermeable area of the site by almost 25%</p> <p>The suggested management of this increase is via water butts, infiltration in gardens of the proposed houses and through an as of yet unformed private management and maintenance company paid for by the future occupiers of the dwellings.</p>
ENV9 i) Development will not be permitted which would result in an unacceptable risk of pollution to ground water, surface water-bodies and tidal waters.	The proposals include for the discharging of surface and treated foul water into the River Brit, within the information provided as part of the planning application there has been no analysis of the risk this approach poses to the River and the water quality
ENV12 i) Development will achieve a high quality of sustainable and inclusive design. It will only be permitted where it complies with national technical standards and where the siting, alignment, design, scale, mass, and materials used complements and respects the character of the	As Sustainability is such an important aspect of this project, it would be welcome to see the scheme aligning with nationally recognised standards such as BREEAM Residential which would provide 3 rd party certification and align the scheme with many of the areas set out within the Sustainability Checklist.

surrounding area or would actively improve legibility or reinforce the sense of place.	This is also reflected within the supporting narrative for the policies which states " <i>councils will therefore require a nationally recognised assessment (such as BREEAM Communities) to be carried out for the larger developments where masterplans are to be prepared</i> "
ENV13 i) New buildings and alterations / extensions to existing buildings are expected to achieve high standards of environmental performance.	

6. SUMMARY

Upon reviewing the sustainability statement and its appendices, it is evident that the information provided is insufficient to meet the sustainability requirements outlined in the West Dorset, Weymouth and Portland Local Plan and other relevant planning policies including the required Sustainability Statement and Checklist for Planning Applications (Dec 2023)..

Furthermore, as this is a full planning application, it is concerning that several documents indicate key details will be provided at a later stage. This approach is inappropriate, as some of these details—such as PV array sizing and thermal modelling—are fundamental to the design and functionality of the development. These elements must be established now, as they directly influence building orientation, massing, and sizing, and cannot be deferred until after planning consent.