

Application Number:	P/FUL/2024/01407
Webpage:	Planning application: P/FUL/2024/01407 - dorsetforyou.com (dorsetcouncil.gov.uk)
Site address:	Folly Mill Lodge South Street Bridport
Proposal:	Replace all existing timber-framed windows with UPVC framed windows
Applicant name:	Churchill Estates Management
Case Officer:	Jo Langrish-Merritt
Ward Member(s):	Cllr Bolwell, Cllr Bolwell, Cllr Williams

1.0 In accordance with the scheme of delegation the application is brought to committee at the request of the chair following a scheme of delegation referral.

2.0 Summary of recommendation:

Refuse

3.0 Reason for the recommendation:

In summary, the proposed installation of the UPVC windows to replace timber windows would neither enhance, preserve nor reinforce the distinctiveness of the area. Whilst this is a modern building it is located directly adjacent to the Grade II* Bridport Museum and within the Bridport Conservation Area therefore, the use of modern, UPVC is considered to cause less than substantial harm to the Bridport Conservation Area and setting of the Grade II* Bridport Museum as designated heritage assets without sufficient public benefits to outweigh this harm. As such the proposal is considered to be contrary to the development plan.

4.0 Key planning issues

Issue	Conclusion
Impact on visual amenity and Heritage assets	The application site is a modern building approved in 2001 however it is located directly adjacent to the Grade II* Bridport Museum and sits in a prominent location within the Bridport Conservation Area. The building would be viewed in direct context with the adjacent grade II* listed building and the use of timber windows compliments the detailing of this historic building. As such the proposal is considered to result in less than substantial harm to the Bridport Conservation Area and setting of the Grade II* Bridport Museum as designated heritage assets without sufficient public benefits to outweigh this harm.

Impact on residential amenity	No adverse impact
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5.0 Description of Site

Folly Mill Lodge is a large modern block of flats and retirement cottages located in the centre of Bridport. The building fronts South Street (27-29 South Street) and this element of the building is three storey with commercial units on the ground floor and residential above. It is also directly adjacent to Bridport Museum a grade II* listed Building. The side elevation is also three storey and faces on to Folly Mill Lane with the access and the two storey retirement cottages leading from Folly Mill Lane. The site on this eastern edge is also partially bounded by a listed wall. The site is located in the Bridport Conservation area. Folly Mill Lodge was approved in 2001 reference: 1/W/01/000726.

6.0 Description of Development

The application is for the replacement of all existing timber-framed windows with UPVC framed windows on a like for like basis from white timber to white UPVc due to significant weathering and in a bid to make the building more energy efficient.

7.0 Relevant Planning History

1/W/01/000726 - Decision: GRA - Decision Date: 24/12/2001

Demolish existing buildings (granted under PA 1/W/1999/0661U) Erect three storey block of 2No shops and 30No sheltered apartments. Erect 3No retirement cottages, construct car parking and modify existing vehicular/pedestrian access (AMENDED DESIGN)

1/D/07/001529 - Decision: GRA - Decision Date: 15/10/2007

Install new window opening in kitchen and PVCU double glazed window

8.0 List of Constraints

THE CASTLE (MUSEUM AND ART GALLERY) listed building grade G2*. HE Reference: 1227857

WALL FROM CO-OP AS FAR AS NO 1 listed building grade G2. HE Reference: 1216226

Bridport Conservation Area

Dorset National Landscape (AONB); Dorset

Secondary Shopping Frontage; South Street, Bridport

Dorset Council Land (Freehold): DT369462 - Reference 50077

Special Area of Conservation (SAC) (5km buffer): Chesil & The Fleet (UK0017076);

Risk of Surface Water Flooding

9.0 Consultations

All consultee responses can be viewed in full on the website.

Consultees

1. Bridport Town Council

“Strongly support. These changes are required for carbon reduction and for the protection of elderly and vulnerable residents. There is no impact on the conservation area.

The Town Council considers in this case that, in line with NPPF para 208, less than substantial harm to the significance of a designated heritage asset is justified by the public benefits of the proposal, including securing its optimum viable use. The development also satisfies NPPF para 157 as it supports the transition to a low carbon future.

NPPF para 8 also applies here, in that the proposals aid the achievement of the NPPF social objective of providing homes “to meet the needs of present and future generations”.

The minimal impact of the energy saving measures also serves to address NPPF para 195, which provides for heritage assets to be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. The significance of the heritage asset is not damaged by the proposed development.

The Local Plan requirement (in policy ENV4) to justify “harm” to the significance of the heritage asset has been met. The public benefit derived from improving the energy efficiency of the housing stock, and the contribution it will make to Bridport’s ‘net zero’ carbon ambition, outweighs the impact on the listed building.

The Council reminds the planning authority of a statement to Dorset Council members by its Corporate Director, Economic Growth and Infrastructure, recognising the need for “...conversation about conservation”, recognising concerns that the interpretation of planning policy is damaging the environment. We urge Dorset Council to cater for Bridport’s future environment, and to recognise the inevitability of modest adaptations such as this being accepted as absolutely necessary.

- 2. Dorset Council Conservation Officer-** Although this building is not historic, it is prominent in the street scene in the heart of Bridport conservation area and was designed to respect the setting of the Grade II* listed early 16th Century building immediately adjacent to its north. Removing all the existing timber windows and replacing them with uPVC would result in harm to the character and appearance of the conservation area and harm to the setting of the Grade II* listed building.

Representations received - None.

10.0 Duties

s38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications must be in accordance with the development plan unless material circumstances indicate otherwise.

The Planning (Listed Buildings and Conservation Areas) Act 1990- **66. — General duty as respects listed buildings in exercise of planning functions.**

(1) In considering whether to grant planning permission [or permission in principle]¹ for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Clause 85 of the Countryside and Rights of Way Act (2000) requires Local Planning Authorities to seek to further the purposes of conserving and enhancing the natural beauty of National Landscape (AONB).

11.0 Relevant Policies

Development Plan

Adopted West Dorset and Weymouth & Portland Local Plan (2015):

The following policies are considered to be relevant to this proposal:

- INT1 - Presumption in favour of Sustainable Development
- ENV1 - Landscape, seascape & sites of other geological interest
- ENV4 - Heritage assets
- ENV10- The landscape and townscape setting
- ENV 12- The design and positioning of buildings
- ENV 13 - Achieving High Levels of Environmental Performance
- ENV 16- Amenity

Made Neighbourhood Plans

Bridport Neighbourhood Plan 2020-2036 (made 5/5/2020)

POLICY CC2 energy and Carbon emissions

POLICY HT2 Public Realm

Material Considerations

Emerging Local Plans:

Paragraph 48 of the NPPF provides that local planning authorities may give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant plan policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the NPPF (the closer the policies in the emerging plan are to the policies of the NPPF, the greater the weight that may be given).

The Dorset Council Local Plan

The Dorset Council Local Plan Options Consultation took place between January and March 2021. Being at a very early stage of preparation, the relevant policies in the Draft Dorset Council Local Plan should be accorded very limited weight in decision making.

National Planning Policy Framework

Paragraph 11 sets out the presumption in favour of sustainable development. Development plan proposals that accord with the development plan should be approved without delay. Where the development plan is absent, silent, or relevant policies are out-of-date then permission should be granted unless any adverse impacts of approval would significantly and demonstrably outweigh the benefits when assessed against the NPPF or specific policies in the NPPF indicate development should be restricted.

Other relevant NPPF sections include:

- Section 4 'Decision making': Para 38 - Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.
- Section 12 'Achieving well designed and beautiful places' indicates that all development to be of a high quality in design, and the relationship and visual impact of it to be compatible with the surroundings. In particular, and amongst other things, Paragraphs 131 – 141 advise that:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development.

Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

- Section 15 'Conserving and Enhancing the Natural Environment'- In Areas of Outstanding Natural Beauty (National Landscapes) great weight should be given to conserving and enhancing the landscape and scenic beauty (para 182). Decisions in Heritage Coast areas should be consistent with the special character of the area and the importance of its conservation (para 184). Paragraphs 185-188 set out how biodiversity is to be protected and encourage net gains for biodiversity.
- Section 16 'Conserving and Enhancing the Historic Environment'- When considering designated heritage assets, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (para 205). The effect of an application on the significance of non-designated heritage assets should also be taken into account (para 209).

Other material considerations

All of Dorset:

Dorset Council Interim Guidance and Position Statement Appendix B: Adopted Local Plan policies and objectives relating to climate change, renewable energy, and sustainable design and construction. December 2023.

Supplementary Planning Documents/Guidance For West Dorset Area:

WDDC Design & Sustainable Development Planning Guidelines (2009)

Landscape Character Assessment February 2009 (West Dorset)

Conservation Area Appraisals:

Bridport Town Centre adopted January 2003

12.0 Human rights

Article 6 - Right to a fair trial.

Article 8 - Right to respect for private and family life and home.

The first protocol of Article 1 Protection of property.

This recommendation is based on adopted Development Plan policies, the application of which does not prejudice the Human Rights of the applicant or any third party.

13.0 Public Sector Equalities Duty

As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have "due regard" to this duty. There are 3 main aims:-

- Removing or minimising disadvantages suffered by people due to their protected characteristics

- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.

Whilst there is no absolute requirement to fully remove any disadvantage the Duty is to have “regard to” and remove or minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the Public Sector Equalities Duty. This application is seeking to improve the thermal efficiency of the building which includes additional care and assisted living accommodation for the elderly.

14.0 Financial benefits - None relevant.

15.0 Environmental Implications - Potential upgrade in energy efficiency.

16.0 Planning Assessment

Impact on visual amenity and Heritage assets

16.1 Policy ENV4 (Heritage Assets) of the adopted local plan requires development to conserve and, where appropriate, enhance the significance of designated and non-designated heritage assets. Where significance would be affected, sufficient information is required to demonstrate how the proposal would contribute positively to an asset’s conservation. Any harm must be justified, and that harm will be weighed against any public benefits, in common with paragraph 208 of the NPPF.

Policy ENV10 (The Landscape and Townscape Setting) requires all development to contribute positively towards local identity and distinctiveness, having been informed by the character of the site and its surroundings.

Policy ENV12 (The Design and Positioning of Buildings) requires high-quality design, which:

‘Will only be permitted where... materials used complements and respects the character of the surrounding area... This means that:

- *The general design should be in harmony with the adjoining buildings and the area as a whole...*
- *The quality of the architecture is appropriate to the type of building with particular regard to... richness of detail...*
- *Materials are sympathetic to the natural and built surroundings.’*

16.2 Folly Mill Lodge is located within the Bridport Town Centre Conservation Area and directly adjacent to the Grade II* listed Bridport Museum. Whilst it is recognised that the building itself is not historic, it is prominent in the street scene and was designed to respect the setting of the Grade II* listed early 16th Century Museum directly to the north. The 16th Century museum building is identified in the Bridport Conservation Area Appraisal as a Key Building in the Conservation area. Grade II*

buildings are particularly important buildings of more than special interest, only 5.8% of listed buildings are Grade II* as identified by Historic England.

16.3 Folly Mill Lodge also has a prominent flank elevation which extends a considerable distance along Folly Lane. However, Folly Mill Lodge itself is considered to make a neutral contribution to the character and appearance of the conservation area, but its visually prominent corner site means it has a significant impact on the overall character and appearance of this part of Bridport Conservation Area.

16.4 Folly Mill Lodge was granted planning permission in 2001. It is clear that when the residential block and cottages were built, quality materials were important for visual amenity. The historic planning file gives an insight into the design rationale for the building at the time that planning permission was granted for its construction, and the discussion that surrounded the design development at the time. It was made clear at the time that once a “pastiche” architectural style and form were chosen for the building, the palette of materials should be selected accordingly: natural stone, timber windows, natural slate roofs and a suitable brick. The existing building complies with this and attempts to blend in with the materials predominantly used in the surrounding historic buildings. The Bridport Conservation Area Appraisal makes particular mention of this modern building and its attempt to blend into the Conservation Area *“Modern materials do not intrude unduly: the recent Library conversion used carefully matched stone in its new ground floor; the new residential development at the corner of Folly Mill Lane employs a combination of high quality brick and stone”*. In 2007 Planning permission was given for the change of a single timber window to UPVc at the site application reference 1/D/07/001529. However, it must be borne in mind that this window was only allowed to change as it was discreetly positioned to the rear of the building, not publicly accessible or viewable and related to a single third floor window. Notwithstanding that, in the context of the current application, a change in all the windows from timber to uPVC would have a negative effect on the character and appearance of the conservation area. It would also have a negative impact on the setting of the adjacent Grade II* listed building.

16.5 The NPPF confirms that great weight should be given to conserving heritage assets:

NPPF Para 205. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance

16.6 Windows are a key component to a building’s appearance. The use of modern UPVC windows in a conservation area is not appropriate and particularly in this instance given the buildings prominent location and that it would be experienced in

the context of the Grade II* Bridport Museum. The windows are part of this buildings traditional detailing complimenting the style and architectural detailing of nearby historic buildings and the wider conservation area. The proposed windows would be immediately apparent visually to that of the traditional timber windows and would neither preserve or enhance the character of the Conservation area or the setting of the Grade II* listed building and would lead to less than substantial harm.

16.7. Bridport Town Council have referred to the environmental benefits of the proposed UPVC windows and it must be considered that the Bridport Neighbourhood plan does include policy CC2 Energy and Carbon emissions which seeks to achieve high levels of energy efficiency. However, this policy relates to new build development only and would not be relevant in this instance. Furthermore, UPVC windows are not considered to be the only solution for energy efficiency. The Conservation Officer has commented that *“If the current timber windows have reached the end of their designed life and localised repairs are not feasible, I would have no objection to replacement timber windows with more energy efficient glazing – either double glazing or laminated glass.”*

16.8 No additional justification such as a Joiners report to explain why the timber windows cannot be repaired and the glazing upgraded has been provided.

16.9 Furthermore Historic England provides the following guidance in relation to the replacement of timber windows with UPVC.

Traditional windows: their care, repair and upgrading:

Why are plastic (PVC-u) windows unsuitable?

The different appearance and character of PVC-u windows compared to historic windows is highly likely to make them unsuitable for older buildings, particularly those that are listed or in conservation areas. PVC-u is short for Poly Vinyl Chloride un-plasticised and these windows are assembled from factory-made components designed for rigidity, thermal performance and ease of production. Their design, detailing and operation make them look different to traditional windows. Manufacturers have been unable to replicate the sections/glazing bars used in most timber and steel windows due to the limited strength of the material and the additional weight of the secondary glazing units. False ‘glazing bars’ which are thin strips of plastic inserted within the glass sandwich of a double glazed unit change the character of the window.

Repairs can be a major problem. Because of the nature of PVC-u, complete replacement is often the only viable option, which makes them a very unsustainable solution when compared to timber and steel.

Although recycling does exist for PVC-u windows this is limited to waste sections left over in manufacturing rather than for complete redundant windows. Discarded windows end up in landfill sites with the potential for releasing some of the most damaging industrial pollutants.

16.9 The applicant has stated that the reason the windows need to be replaced is due to severe weathering and to improve energy efficiency. However, there are

many other means that could improve energy efficiency without requiring the wholesale replacement of all windows with a non-historic product.

16.10 The applicant has also provided an additional Supporting Heritage Statement dated 15/07/24 (extract below) in response to the Conservation Officer comments

“The use of materials, from timber to uPVC on an existing building of twenty first century date, is not considered inappropriate or out of character within the conservation area. The use of such windows on non-listed buildings is not unprecedented within the conservation area and indeed in the surroundings of Folly Mill Lodge.

Although the planning application is for a replacement of the existing windows, the changes proposed relate to the materials solely (i.e. change from timber to uPVC). Such change would be almost indistinguishable from the existing windows; the proposed use of uPVC provides energy efficient and durability, the latter of which ensures it will not deteriorate and cause negative impacts upon the historic environment. uPVC would also not present a new phenomenon, with this material already present elsewhere in Bridport Conservation Area.

In addition, care has been taken to source windows that comprise of similar dimensions of framing as the existing windows so that the issues that are flagged by Historic England in their guidance and the Conservation officer about appearance is overcome. This was provided as part of the planning application. The Historic England guidance does not reflect the advances that have been made in recent years to the design of PVC-u windows.”

16.11 UPVC is a far less sustainable material than timber, mainly owing to the use of plastic and the process of its manufacture, but also its short longevity. In fact, the material is inherently unsustainable: sealed units will typically not last more than an absolute maximum of 15 to 20 years, after which the difficulties and uneconomic costs of repair, usually result in replacement. Replacement is more usual because the material cannot be decorated and does not patinate, but simply degrades, typically through discoloration and resulting loss of visual appeal. Conversely, high-quality timber windows can last for centuries when properly maintained and, when paint fails, can be redecorated to look as new. As such no evidence has been provided as to why these windows cannot be repaired and redecorated.

Furthermore, whilst the applicant has stated a similar design of windows is proposed the appearance of UPVC windows being overly modern, unageing, glossy/reflective plastic and of thicker proportions would result in poor visual features within the conservation area and would be visually prominent given the buildings location.

16.12 Given that the building is directly adjacent to the Grade II* Bridport Museum and within the Bridport conservation area, the Conservation Officer has concluded that the use of modern, UPVC is considered to cause less than substantial harm to the Bridport Conservation Area and the setting of the Grade II* Bridport Museum as

designated heritage assets. In line with NPPF Para 208. Consideration should be therefore given to any public benefit of the scheme.

208. *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*

16.13 As such the public benefit of the scheme must be considered to determine if this may weigh in the favour of the scheme. The only public benefit that could be gained is the benefit to the residents of this building through the installation of new windows through thermal and energy efficiency and consequent reductions in CO2 emissions. This is a limited and mainly private benefit. Any public benefit that could be associated with the use of uPVC rather than timber must be weighed against the harm to the character and appearance of the conservation area, or the harm to the setting of the Grade II* listed Museum building. It must be considered that a similar benefit could be achieved through the repair and upgrade of the existing timber windows without this harm. Bridport Town Council have also commented that replacing the windows in the existing block of flats would deliver the optimum viable use of Folly Mill Lodge. This is not considered to be a relevant consideration as the building is already fully utilised for a residential purpose and the change of windows would not have a significant impact on this established use. As such this public benefit is not considered to be sufficient to outweigh the harm to the designated heritage assets.

16.14 There have been various appeal decisions in recent years which support Council policy that replacing timber windows with UPVC in historic areas is inappropriate but most notably the appeal decision for 36 Alexandra Road in Weymouth (appeal reference APP/D1265/W/22/3290991). In that case, planning permission was required to alter the windows from timber to UPVC within the Conservation Area. The building was not listed nor was it a non-designated heritage asset. In that case, the appeal inspector considered the issue of energy efficiency and stated:

*'10. In terms of benefits, the appellant points to the energy performance of doubleglazed units and the benefits this could have for the occupants in terms of fuel bills and their health. I am in no doubt that double glazing could reduce condensation and make the property more energy efficient, perhaps by something in the region of 30%, contributing towards lower carbon emissions. However, it is reasonably likely that some energy savings could also be achieved through options such as draught strips, the installation of secondary glazing **or replacement double glazed timber windows (officer emphasis)**. I therefore give this matter limited weight.'*

They also considered the issue of precedence:

'12. The appellant refers to a number of properties in the CA with replacement UPVC windows. From my own assessment of the CA, I found many examples close to the

appeal site of inappropriate UPVC replacement windows where the design, style of opening and thickness of the frames detracted from the character of the building and the wider area. However, rather than being a benefit which should be weighed in the balance, this reinforces my view that inappropriate windows could have a harmful effect on the character and appearance of the CA.'

16.15 It is clear that the Inspector in that appeal considered that the insertion of UPVC windows would degrade the character & appearance of the Conservation Area and that like this case, there is no reason for automatically assuming UPVC is the first choice most appropriate replacement (likely because of initial cost) when other measures have not been considered first which a. are more appropriate within a historic setting and b. just as energy efficient and cost efficient because likelihood of replacement/failure is less if maintained appropriately.

16.16 Consideration is also given to the Bridport Neighbourhood Plan which clearly states on page 58 (with officer emphasis in bold):

'The cumulative impact of developments **that use inappropriate materials** and intrusive lighting **can erode the historic integrity of neighbourhood plan settlements**. Therefore, the Plan contains a range of policies that address design matters such as these.'

NB. It is noted that there is no scale of development of which that statement refers and as such it can be applied equally to all development.

As such, it is considered that this scheme does result in 'harm' to qualities of the public realm of Bridport Town Centre (which is enhanced by its historic quality) and fails policy HT2 of the Bridport Neighbourhood Plan 2020-2036 (made 5/5/2020).

Impact on residential amenity

16.17 No additional windows are to be added therefore there is not considered to be an adverse impact to residential amenity through overlooking or loss of privacy.

Other matters

16.18 Flood risk- There is not considered to be any adverse flood risk impact given that the proposal is for the replacement of windows

16.19 Chesil and Fleet Special Area of Conservation (SAC) - There is not considered to be any adverse impact on the protected site as a result of the proposals given this scheme is not for overnight accommodation.

16.20 Dorset National Landscape (AONB) - The designation washes over Bridport and given the nature of the proposals in an urban location within limited appearance in the landscape, it is considered that the development would not impact on the duty to seek to further the purposes of conserving and enhancing the natural beauty of National Landscape (AONB) and would have no adverse impact on the landscape surrounding the town.

17.0 Conclusion

In conclusion, whilst this is a modern building it is located directly adjacent to the Grade II* Bridport Museum and within the Bridport conservation area. As such, the use of modern, UPVC is not considered to preserve nor enhance the character of the Bridport conservation area or the setting of the Grade II* listed building and would cause less than substantial harm to both of those designated heritage assets without sufficient public benefits to outweigh this harm. UPVC is not considered to be a sustainable material compared to timber and similar energy efficiencies could be achieved through the repairs and redecoration of the existing windows. As such the proposal is considered to be contrary to policies ENV4, ENV10 and ENV12 of the West Dorset, Weymouth & Portland Local Plan (2015); and paragraphs 205, 206 and 208 of the NPPF (2023).

18.0 Recommendation

Refuse for the following reason:

The site is located within Bridport Town Centre Conservation Area, and it is highly visible from the public domain. It is also experienced within the setting of the adjoining grade II* Bridport Museum and its existing timber windows complement the detailing of this historic building. The proposal to replace the windows with UPVC would be inappropriate for the site and locality, failing to conserve or enhance the character and appearance of the conservation area. This is on the basis of UPVC windows being overly modern, unageing, glossy/reflective plastic and of thicker proportions which would result in poor visual features within the historic/traditional area/building. The development would lead to less than substantial harm to designated heritage assets, including the setting of a grade II* listed building, which would not be outweighed by any public benefits, in conflict with policies ENV4, ENV10 and ENV12 of the West Dorset, Weymouth & Portland Local Plan (2015); policy HT2 of the Bridport Neighbourhood Plan 2020-2036 (made 5/5/2020) and paragraphs 205, 206 and 208 of the NPPF (2023).