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13 March 2020

Our Reference: 227623

Dear Sir/Madam

### **Milton Abbas Neighbourhood Plan 2019-2031**

We write in response to the Milton Abbas Neighbourhood plan regulation 21 consultation on behalf of our client Gleeson Strategic Land (Gleeson). Gleeson has land under its control in the village, part of which is currently the subject of Planning Application 2/2019/0824/OUT for the development of up to 30 homes (known in the neighbourhood plan as site 7). The neighbourhood plan does not allocate this site for development.

This representation sets out concerns in respect of Milton Abbas Neighbourhood Plan, and in particular the sites that are proposed for allocation, and why it's considered the plan does not meet the basic conditions.

We consider it essential that the Neighbourhood Plan is examined through a hearing, to ensure adequate examination of the site allocations, within the AONB.

We also consider it essential that an accompanied site visit is undertaken. This is necessary so the examiner can fully appreciate the context of both the allocated sites, and those not allocated, and the potential impact of the neighbourhood plan on the AONB.

Yours faithfully

**Simon Ible MRTPI**  
Associate Director

cc Rachel Scott Gleeson

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# MILTON ABBAS NEIGHBOURHOOD PLAN

Regulation 16 Consultation 31 January to 13 March 2020

## Response Form

The proposed Milton Abbas Neighbourhood Plan 2019 to 2031 has been submitted to Dorset Council for examination. The neighbourhood plan and all supporting documentation can be viewed on Dorset Council's website: [www.dorsetcouncil.gov.uk/milton-abbas-neighbourhood-plan](http://www.dorsetcouncil.gov.uk/milton-abbas-neighbourhood-plan)

### Please return completed forms to:

Email: [planningpolicyteamd@dorsetcouncil.gov.uk](mailto:planningpolicyteamd@dorsetcouncil.gov.uk)

Post: Planning Policy, South Walks House, South Walks Road, Dorchester, DT1 1UZ

**Deadline: 4pm on Friday 13 March 2020.** Representations received after this date will not be accepted.

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### Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**.

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.*

	Personal Details	Agent's Details *
Title	Mrs	Mr
First Name	Rachel	Simon
Last Name	Scott	Ible
Job Title(if relevant)	Development Director	Associate Director
Organisation (if relevant)	Gleeson Strategic Land	Terence O'Rourke Limited
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## Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

X	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	X
Section	
Policy	
Page	
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
X	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Please refer to appended separate sheets for each policy.

*Continue on a separate sheet if necessary*

**5. Please give details of any suggested modifications in the box below.**

Please refer to separate sheets for each policy.

*Continue on a separate sheet if necessary*

**6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.**

X	Yes
	No

Signature: S IBLE

Date: 13 March 2020

*If submitting the form electronically, no signature is required.*

**Data protection**

By signing or electronically submitting this form, you are agreeing to your comments being made publicly available. We will not display your personal data online, however we may share your details with the independent examiner for the purposes of examining the plan. Your information will be retained by the Council in line with its retention schedule and privacy policy ([www.dorsetcouncil.gov.uk/privacypolicy](http://www.dorsetcouncil.gov.uk/privacypolicy)). Your data will be destroyed when the plan becomes redundant.



## Policy MA1 Spatial Strategy

### *Supporting text*

1. Table 1: Development Site includes “conversions of existing buildings” in the supply of homes for the village. This should not be included, as it relies on permitted development rights, the tests for which may or may not be satisfied.

### *Housing requirement*

2. The NPPF in paragraph 29 states “*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*”. It also states in paragraph 65:

*“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”*

3. National policies post-date the development plan, therefore the North Dorset local plan does not provide a figure for the designated area, but provides the minimum number of homes for two levels of settlements. These are ‘Market Towns’ (which each have a separate minimum), and ‘Stalbridge and the Larger Villages’, (which have an overall minimum). Milton Abbas falls into the latter category, and a minimum figure of 825 dwellings is provided for this category of settlements in total.
4. How the housing requirement for Milton Abbas has been arrived at for the Neighbourhood Plan is set out in the Milton Abbas Housing Needs Assessment. This in effect simply relies upon the 825 dwelling minimum figure applied pro-rata to the number of homes in the village, and various percentage uplifts on this. It is important to understand the context why the figures are minima in the local plan, and why planning for too few new homes would undermine the strategic policies of the local plan contrary to national guidance.
5. The North Dorset Local Plan was adopted in 2016 with the clear acknowledgement that the housing requirement was below need, and a review was required almost immediately upon adoption. This was because the 2015 SHMA was published in the final stages of examination, and indicated that housing need had increased to 330 dwellings per year from the 285 dwellings proposed in the local plan.
6. The inspector’s justification for finding it sound, notwithstanding evidence showing the housing need was much higher, included the following:
  - “The Council’s commitment to an early review of the local plan”
  - “The fact that the Housing Trajectory identifies a significant over-supply of dwellings (when assessed against the annual target) for all years up to 2020”
  - “The high levels of housing delivery achieved in North Dorset in the previous plan period (1994 to 2011)”



7. There is now a material change in circumstances:
  - The early review of the plan was anticipated (as set out in paragraph 15 of the IR) to have started by the end of March 2016 with adoption of the revised plan by the end of November 2018. This has not taken place, and a new plan is now not anticipated to be adopted until 2024, six years later.
  - The anticipated housing delivery did not occur. From 2015 to 2019 only 744 dwellings were delivered in the four-year period when 1,692 dwellings were projected, only 44% of that projected and 65% of the local plan requirement.
  - The previous high levels of housing delivery achieved are now irrelevant, superseded by four years of under delivery, with some of the lowest levels of housing delivery in the past 25 years occurring in 2016/17 and 2017/18.
8. The other justifications the inspector provided for finding the local plan to be sound at that time despite the housing requirement being less than the most recent SHMA were:
  - *“The confirmation in modified paragraph 5.14 that the Council would not seek to restrict the supply of additional housing, provided any proposal would accord with the agreed spatial approach”*
  - *“The level of flexibility already embedded within the policies of LP1 – for example the housing figures are preceded by ‘at least’ and references are made to potential future areas of growth (for example at Blandford Forum and Shaftesbury)”*
  - *“The opportunity provided by Neighbourhood Plans to identify sites for housing”*
9. The above indicates that, notwithstanding that much more housing was anticipated to have been delivered in the first four years of the plan period than actually has been, the inspector was very much anticipating:
  - The housing requirements to be minima with additional housing not being restricted
  - That the policies provided flexibility to be exceeded
  - That neighbourhood plans would identify more sites for housing, over and above these minima.
10. It is therefore not appropriate to simply take the 825 minimum and apply it pro-rata to the size of settlement, as the local plan inspector was anticipating neighbourhood plans identifying more sites for housing.
11. It is also relevant to look at the 2015 SHMA, given the local plan housing requirement was based upon the 2012 SHMA.
12. Milton Abbas falls within the ‘south’ area of the 2015 SHMA. The SHMA recommended 3,820 new dwellings for the ‘south area’ 2013-2033 which equates to one new dwelling for every 3.789 existing dwellings. This is how the Okeford Fitzpaine housing need assessment arrived at its requirement (although the neighbourhood plan has not progressed).



13. With 263 existing dwellings in Milton Abbas, using this calculation, the requirement for the village would be 69 dwellings (263/3.789).
14. However, the latest NPPF sets out that Local Housing Need should now be used. For North Dorset this is a requirement of 352 dwellings per year, a 7.6% increase against the 2015 SHMA. If this 7.6% increase is applied to the 69 dwellings, then Milton Abbas ought to be providing 74 dwellings.
15. The NPPG states:

*“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, **up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.*** (Paragraph: 009 Reference ID: 41-009-20190509)
16. North Dorset cannot currently demonstrate a five year supply of housing. In the examination of the Blandford + neighbourhood plan, Dorset Council acknowledged this would be the case for the foreseeable future. With the increased housing need, and the lack of a five year supply, it is therefore considered that not allocating sufficient sites would mean the neighbourhood plan does not contribute to the achievement of sustainable development and therefore does not meet the basic conditions.
17. The Milton Abbas Housing Need assessment states that *“More than 30 homes would risk a potential conformity issue with the adopted and emerging Local Plan”*. We do not consider this to be the case as it was anticipated that neighbourhood plans would be making additional allocations, and the numbers would be treated as minima. Only if the level of housing proposed was approaching that of a Market Town (i.e. hundreds of homes) would there be an issue of general conformity in order to meet the basic conditions.
18. Overall it is accepted that calculating the housing need is not an exact science, but based on the available evidence of increased need, the requirement should fall between 30 and 74 dwellings in order to meet the basic conditions, assuming suitable sites for allocation can be found, not 20 dwellings as currently identified in the plan.
19. We also do not agree with justification given in the housing need assessment for reducing the requirement because of completions since 2011. Applications 2/2013/0651/PLNG and 2/2014/0298/PLNG listed as completions were certificate of lawful use applications, and have therefore not led to an increase in dwellings, but confirmed the lawful use of dwellings that were existing. These four completions should not be used to reduce the requirement. Permission 2/2011/0671/PLNG was for one. agricultural workers dwelling, which does not meet the general housing need of the village, and therefore also should not be used to reduce the requirement. Completions should therefore total eight since 2011 (six of which were affordable).
20. Irrespective of the precise figure, completions should not be used to reduce the requirement because:



- The plan period for the neighbourhood plan is from 2020, therefore should not reflect delivery from 2011 but is in effect a new plan period
- The Local Housing Need figure takes into account any previous over/underdelivery as part of the affordability calculation. Therefore, reducing the requirement on the basis of past delivery would be the incorrect approach
- The public consultation is about planning for the new homes needed in the future, not what homes were needed from 2011.

21. In respect of the public's views, the consultation statement key findings are:

*“there is widespread community acceptance of the need for new development, but that this should be limited to 30 new homes or less”.*

22. Given the government imperative to significantly boost the supply of housing as set out in paragraph 59 of the NPPF, and the public support for 30 new homes, irrespective of completions from 2011, the proposed allocations should be for **at least** 30 dwellings to be allocated. Additional sites, or reserve sites should be considered to boost the supply of housing up to 74 dwellings to reflect the more recent housing need information.

23. By not allocating sufficient new dwellings, the neighbourhood plan would quickly be overtaken by the new Local Plan which would likely need to make additional allocations in the village.

24. As set out elsewhere in these representations, we have fundamental concerns in respect of the sites which are allocated. We consider that only 4 dwellings are deliverable on site 5 and none on the other allocated sites, resulting in a significant shortfall that can only be addressed by making other allocations, otherwise the housing need of the village will not be met.

25. Additionally, irrespective of the site-specific issues, the lack of any trajectory or deliverability information is contrary to the NPPG meaning the plan cannot comply with the basic conditions.

#### *Settlement boundary*

26. The supporting text at 6.19 states:

*“The settlement boundary in the adopted Local Plan does not cover the whole settlement as it is centred on St Catherines Well and excludes The Street. The only change to the boundary is to include Sites 5 and 6, as shown on Figure 2, which immediately abuts this area. It would not make sense to include Site 8 within its own settlement boundary, or to extend the settlement boundary arbitrarily to link to it, but its allocation should not be seen as conflicting with the general ‘countryside’ policies that would otherwise apply to this area”*

27. If the settlement boundary is to be reviewed, it should be on a consistent, methodical and logical basis. As proposed:

- Two allocations are proposed for inclusion in the settlement boundary, one is not





- The more recent completed development at Damers Close is not included in the settlement boundary, which is odd and illogical
- We question why the houses around and including New Close Cottages in the north of the village are not proposed for inclusion, or the Street itself.

28. The current boundary dates from January 2003, and does require review, but simply including two of the allocations in an updated settlement boundary is not sufficient.

#### Site 7

29. Site 7 is in the control of Gleeson Strategic Land, and has not been allocated for development. We consider that the site should have been allocated.
30. From the initial stages of the neighbourhood plan process, Gleeson has been open about the potential development of the site. Some details of this engagement with the neighbourhood plan group do appear to have been used in the promotion of the neighbourhood plan as set out in the Consultation Statement. In particular, we note the inclusion of a screenshot of a post on Facebook dated 29 June 2018 which states:

*“The Neighbourhood Development Plan (NDP) Group has just met with a developer about a proposal for 60-100 new homes within the red line boundary of this image”.*



31. However, in actual fact, at our meeting with the group on 29 June 2018, it was made clear that Gleeson was considering a development comprising 40-60 homes, as reflected in our subsequent letter dated 31 July 2018, which was published on the Parish Council website and reads as follows:

*“We subsequently met on 29 June 2018 at which I explained that Gleeson was considering promoting this site for the development of around 40 to 60 dwellings (including affordable housing) and open space, and that because of the site’s size, there was potential to accommodate additional community facilities should there be a local need for something specific and if such facilities could be viably provided. I confirmed that Gleeson did not have fixed plans for the site and that they were open to suggestions concerning community infrastructure. Members of the steering group indicated that whilst there had been an ambition for a new village hall, an application for such a facility at the village sports ground had been refused in 2006. It was now felt that there was less need for a village hall, but that a replacement doctor’s surgery and a skatepark were items of infrastructure that would be worth considering, but that it was important to gather the views of all local residents”*

32. The poster included on page 4 of the consultation statement produced to advertise the 23rd July open meeting includes the statement:



*“100 new homes in the field across the road from Catherine’s Well?  
200 more cars and bikes using local roads? 300 extra residents....”*

33. Again, at an early stage in the plan making process, there is further evidence of sensationalist and incorrect information about Gleeson’s intentions being uploaded to social media.
34. The most recent consultation which assessed site 7 (alongside various other sites) was in February/March 2019. The outcome of this was that 65% of responses considered site 7 to be suitable or highly suitable (7% neutral, and 25% unsuitable or highly unsuitable). A majority therefore considered the site suitable for development.
35. One of the reasons the site was discounted was that it was ‘too large’, yet other sites put forward for consideration were subdivided, such as site 5. It is evident to us that Gleeson’s site has not been considered accurately or fairly throughout the neighbourhood plan preparation process. The SEA has always acknowledged the suitability of the western part of the site for allocation.
36. As set out in other representations, the allocations at sites 5 and 8 should be deleted for the plan to meet the basic conditions, whilst the capacity of site 6 needs to be significantly reduced to four dwellings in order to meet the basic conditions.
37. Site 7 should be allocated for development. It is a suitable and sustainable site, it is recognised as having development potential within the LUC landscape and heritage assessment (October 2019) that forms part of the evidence base for the emerging Dorset Council local plan, it received significant public support through the neighbourhood plan process and delivers better accessibility to existing facilities in the village than the allocated sites. The site is in the control of a developer, with a current planning application seeking the development 30 dwellings awaiting determination (reference 2/2019/0824/OUT). The application is in outline with appearance and landscaping reserved for future approval, albeit that a detailed landscape parameter plan has been submitted for approval. A copy of the site layout is appended for information, showing how an allocation of 30 dwellings could be accommodated on site 7.
38. In the SEA (November 2019 addendum) the justification for not allocating the site includes comments that have been provided in response to Gleeson’s planning application for up to 58 dwellings, in particular, the AONB officer comments and conservation officer comments. Notwithstanding that the application has been amended to address these comments, the approach the neighbourhood plan group has taken with site 6 is to amend the allocation in response to the AONB comments (not simply delete it). Furthermore, the Heritage Assessment of the neighbourhood plan sites by Kevin Morris Heritage Planning (February 2019) confirms that there is no heritage reason why site 7 should not be allocated. The local green space assessment and important views also do not identify any constraints.
39. There was a highways objection to the planning application in respect of site 8, which shows this site is entirely undeliverable, yet this site has not been deleted from the plan.



## Summary

40. This policy does not meet the basic conditions because:

- It does not assist with “significantly boosting the supply of housing” as required by national policy as the housing requirement is too low, and should be **at least** 30 dwellings and up to 74 dwellings
- There is no evidence of how the settlement boundary has been reviewed, does not represent the built extent of the village, and does not include all of the proposed allocations
- The spatial strategy should allocate site 7 which adjoins the existing settlement boundary for residential development.

Appendix  
Site 7 layout plan for 30 dwellings from application 2/2019/0824/OUT





Note: The Primary mitigation in the form of tree's hedgerow and woodland planting is fixed and is shown on the landscape & open space parameter plan (drawing TOR-PP03). Secondary mitigation and detailed landscaping will be subject to condition





## Policy MA 2 Low Housing Density

1. Paragraph 122 of the NPPF requires efficient use to be made of land, yet proposed policy MA2 does not support this and does not help achieve sustainable development.
2. The policy proposes a maximum density of 15 dwellings per hectare (dph).
3. Whilst on some sites in the village 15 dph may be a suitable maximum density, on others it may not. The Housing Density Assessment that forms the evidence base acknowledges that densities in the village range from 1.3 to 53.6 dph, and recognises that seven out of the 19 parcels assessed in the village already exceed 15 dwellings per hectare. It is therefore clear that the appropriate density of a site will very much depend upon its context.
4. The Milborne St. Andrew Neighbourhood Plan included a similar policy, but the examiner required its removal to meet the basic conditions. The examiner's report<sup>1</sup> in respect of a maximum density policy stated:

*“the requirements for the density of housing to be below 20dph and for rear garden lengths to be a minimum of 20m are too prescriptive and should both be deleted. Reliance should instead be placed on a case- by-case assessment of schemes against the overall policy objectives and the supporting material”.*

5. In order for there to be consistency between other neighbourhood plans in North Dorset, and to achieve sustainable development we consider that the maximum density policy should be deleted from the Milton Abbas Neighbourhood Plan to meet the basic conditions.

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<sup>1</sup> David Kaiserman BA DipTP MRTPI report to Dorset Council 13 May 2019, see enclosed appendix

**Appendix**

Extract from David Kaiserman BA DipTP MRTPI report to Dorset Council 13 May 2019





# **Milborne St Andrew Neighbourhood Plan 2018 to 2033**

**A report to Dorset Council<sup>1</sup>**

**David Kaiserman BA DipTP MRTPI  
Independent Examiner**

**13 May 2019**

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<sup>1</sup> On 1 April 2019 the county's nine councils were replaced by two new organisations, Dorset Council and Bournemouth, Christchurch and Poole Council. This report was prepared largely on the basis of the submitted documents and the Regulation 16 responses and therefore refers to the Council as "North Dorset District Council" in most places.



### Policy MSA13: Locally-important character features

85. This policy sets out a range of physical features in the village (such as the stream and its bridges, the flint walls etc) which contribute significantly to its particular character. The policy seeks to ensure that care is taken to retain and improve these elements and their setting. Again, there is a need to acknowledge that improvement may not always be possible through the development management process, **and so I recommend that the phrase “where possible” be included in the first sentence of the policy: “Care should also be taken to retain and, where possible, improve existing features.....”.**

### Policy MSA14: Character and design guidance

86. Policy MSA14 sets out some general and some specific guidance on a wide range of design matters. In principle, there is nothing here which fails to reflect national and local planning policy advice; however, I agree with NDDC’s comment about its detailed nature and with Savills who (although they do not use the term) consider elements of it to be too prescriptive – in particular, references to the density of housing schemes and the depths of rear gardens.
87. Rather than suggest a re-wording of the policy to reflect these criticisms, **I am content that the Parish Council re-visit the precise scope and wording of Policy MSA14, with the following points in mind:**
- **generally, the policy should be greatly simplified, concentrating on the broad requirement for new development to respond positively to the local character and history of the area, in order to reinforce the sense of place. The detailed components of design should be contained in the supporting material, if necessary by adding to Table 11<sup>17</sup> or the text in paragraphs 6.29-6.33;**
  - **the references to new development being required to be “visually attractive” or involve “good architecture” are too vague and subjective and should be deleted;**
  - **the requirements for the density of housing to be below 20dph and for rear garden lengths to be a minimum of 20m are too prescriptive and should both be deleted. Reliance should instead be placed on a case-by-case assessment of schemes against the overall policy objectives and the supporting material;**
  - **the references to a mix of building styles, the need for affordable housing to be indistinguishable from market housing, the requirement for details of utility fixtures to be included within an application and the desire to discourage high boundary walls and fences are all relevant development management guidance for applicants, and should be retained in the policy.**

### Policy MSA15: Minimising flood risk

88. Milborne St Andrew has a history of problems caused by flooding caused both by the Bere stream overflowing and by surface-water run-off at times of heavy rainfall. This policy says that all development upstream of March Bridge which is likely to produce increased surface

<sup>17</sup> This is referred to as Table 10 in the fourth paragraph of the policy, which I take to be a typographical error



1. The policy states:

*“The provision of affordable homes above the level set in the Local Plan is encouraged. Housing sites of 6 or more dwellings will be expected to include bungalows or similar property types designed specifically with older people’s needs in mind, as well as making provision for affordable housing.*

*Legal restrictions such as Section 106 will be included to ensure that any affordable housing provided is prioritised and remains affordable to local people (with a connection to the Parish) in perpetuity. A minimum of 50% of the total number of affordable homes on each housing site should in the first instance be offered to be controlled by a Milton Abbas Community Land Trust (if one exists), or equivalent body, for which an appropriate lettings policy will be agreed between the Trust and Dorset Council”.*

2. Whilst the aspiration of the policy is acknowledged, it is not considered compliant with national policy or the strategic policies of the adopted local plan. The ownership of land is not a planning matter and the policy cannot specify who the affordable housing units should, or should not be, made available to.

3. To meet the basic conditions, the following text must be deleted:

*“A minimum of 50% of the total number of affordable homes on each housing site should in the first instance be offered to be controlled by a Milton Abbas Community Land Trust (if one exists), or equivalent body, for which an appropriate lettings policy will be agreed between the Trust and Dorset Council”*



## Policy MA10 (site 5) and supporting text

1. The allocated site is in part of an open agricultural field within the AONB. This field forms the immediate context of views from a bridleway to the north and west that is also identified in the neighbourhood plan as an important view. There are no boundaries to the north and west of the site and as such it forms the character of the wider area.
2. However, whilst recognising that the allocated site is within the boundaries of the Dorset AONB, the Aecom assessment of site 5 states that, “*views into and out of the site are screened by the hedgerows/trees located along the site boundaries.*” This is factually incorrect as there is currently no landscaped edge to the north or west.
3. Under landscape, the site assessment table in appendix A of the submission draft neighbourhood plan describes the landscape as being of “*medium sensitivity to development*” and observes that, “*the site is sufficiently screened from view by the hedgerows/trees located along its boundaries.*” The site is then given a ‘neutral’ score. Given that the site is extremely open in views from the north and west, we consider that attributing a neutral score to this site was incorrect, and that the site should have been assessed as having high sensitivity, comparable with Aecom’s assessment for site 4.
4. Had Aecom’s landscape assessment of this site been correct, we question whether the site would have been taken forward for further assessment as a potential development site.
5. Aecom’s recommendation set out in the Site Assessment Report was that:

*“Providing that development incorporates high quality design which is sensitive to its setting within the Dorset AONB, the northern, southern and western sections of the site are potentially suitable to take forward as an allocation through the Neighbourhood Plan. Providing that the existing constraints can be overcome, the eastern section of the site is considered suitable for development due to its proximity to the road network and to residential properties within the settlement”.*
6. Paragraph 6.74 of the neighbourhood plan goes on to describe the views into and out of the site in a similar way as “*screened by the hedgerows/trees located along the site boundaries*”. As set out above, this is inaccurate as there is currently no landscaped edge to the north or west.
7. This means there are wide open views across the site to the wider agricultural land to the north and west. Likewise views into the site from the bridleway within the AONB to the north west are completely open with no intervening screening, as illustrated in figure 1 appended to this response.
8. The neighbourhood plan suggests that the new development would not significantly change the character of the surrounding landscape, which we do not agree with.



9. Policy MA10 also states that

*“The existing roadside hedgerow should be retained as far as practical, with its removal limited to that required to provide the necessary visual splays (with replacement hedgerow planting set back from the created verge).”*

10. On behalf of Gleeson, i-Transport has prepared a preliminary highway plan to show the extent of hedge removal likely to be required in order to deliver a vehicular access to the site. The extent of hedgerow loss extends to just under 75m assuming a 30mph speed limit and extends beyond the allocated site (see attached plan at appendix 1).
11. The allocated site partly falls along a section of the road that is currently the subject of the national speed limit (60mph). Under higher permissible vehicular speed, more extensive visibility splays and even greater hedge removal would be required. Furthermore, as acknowledged in the supporting text to the policy, the eastern end of the site is elevated above the level of the road, so reprofiling and retaining structures are likely to be required in order to achieve a safe vehicular access. The provision of a heavily engineered access will have an adverse landscape and visual effect on this rural road.
12. This means the gateway to the village will be significantly altered from the north, and will require hedgerow to be replanted in the agricultural field which does not form part of the allocation.
13. In terms of the submission draft neighbourhood plan, paragraph 6.17 states that *“The AONB team raised concerns about site 5 and whether it would fail to conserve the pattern of tight knit villages and views of key landmarks.”* The response given by the Neighbourhood plan group was that, *“Whilst the site would extend beyond the existing area of settlement, changes have been made to the policy to ensure that the northward extension to the settlement is kept to a minimum, and further guidance included on the appropriate scale of development and landscaping of the site.”* We do not believe that the policy responds to the AONB team’s concern and that there are additional landscape, visual and highway safety concerns that have not been addressed, as set out above.
14. Paragraph 6.44 of the draft plan explains that buildings are generally 2 storey and states that, *“the relatively recent homes built at Damer Close, at between 8.5m to 9.5m to the ridge, appear overly tall (compared to surrounding development) because of their more elevated position, the storey heights and how the land was built up (rather than dug into) in response to the slope. It is therefore proposed that building heights are carefully examined particularly in relation to those of existing dwellings in the surrounding area and whether they may have an undue visual impact.”* Policy MA5 therefore states that:

*“New homes in Milton Abbas should not generally exceed two storeys and the ridge heights should be harmonious with and not notably exceed those within the Milton Abbas Settlement Boundary and in the immediate area of the planned development.”*



15. The height of the proposed development for site 5 is considered in detail in paragraph 6.75 which states that *“Given that the eastern end of the site is also slightly elevated in relation to the road, it will also be important that the overall height of dwellings is not particularly tall in this location. As such, the site is likely to lend itself to single storey dwellings or possibly one-and-a-half storey cottages. The ridge heights of Nos 1 and 2 New Close Cottages and Stonecroft (as measured AOD) provide useful guidelines in this context.”*
16. Such sentiments are not followed through into the policy as it does not state that dwellings should be bungalows or one and a half storeys high.
17. Our analysis has determined that Nos 1 and 2 New Close Cottages and Stonecroft are set at approximately 188m AOD and are 195m to their ridgelines<sup>1</sup>. The site extends from approximately 188m AOD in the south east corner to 195m AOD in the north west corner and the majority is above 192m AOD the contour of which generally follows the rear garden of Stonecroft<sup>2</sup> meaning that everything west of the rear garden boundary of Stonecroft is at a height of above 192m AOD. Allowing for a bungalow of 6m high and a one and a half storey dwelling of 7.5m high, the only location where they would not exceed the height of Nos 1 and 2 New Close Cottages and Stonecroft is immediately adjacent to Blandford Road. Elsewhere within the site, a 6m high bungalow would be at a height of between 197m AOD and 201m AOD and a one and a half storey dwelling would be at a height of between 198.5m AOD and 202.5m AOD. This is shown on the submitted drawing SK021.
18. Buildings could therefore be between 2m and 7.5m higher than the existing adjacent buildings depending upon where they are located within the site, notably higher than existing dwellings even as single storey/one and a half storey buildings. Therefore:
- Development of the allocated site cannot come forward and is undeliverable, unless this part of the policy is deleted, and
  - If this policy is deleted it will have an even greater impact on the landscape.
19. As set out in the response to Policy MA6 Important views, the site allocation for site 5 is contrary to the neighbourhood plan’s policy on important views and particularly on view 12b, and the height of development will exacerbate impacts.
20. We note there does not appear to be any landscape assessment of the sites proposed for allocation. The most recent evidence in relation to potential development in Milton Abbas is set out in the Strategic Landscape and Heritage Study for North Dorset Area, Assessment of land surrounding the larger villages. This was prepared by LUC for Dorset Council October 2019 as part of the evidence base to inform the new local plan (extract at appendix 2). This states that:

*“Development is located on lower ground, meaning that skylines are undeveloped and often marked by woodland.”* It goes on to state under

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<sup>1</sup> Based upon planning application drawings at 1 New Close Cottages (ref: 2/2018/0249/HOUSE)

<sup>2</sup> Based upon Ordnance Survey and photogrammetry data



guidance and opportunities that *“The only feasible area identified is that within and adjacent to the existing modern development to the north of the conservation area. Here there may be the potential for some infill development, but to avoid/ minimise harm it should ideally not be permitted to extend further upslope than it already does e.g. beyond the 190m contour.”*

21. Allocation of site 5 is entirely above the 190m contour, completely contrary to this evidence. Planning policy guidance states:

*“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan **the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.** For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development” (emphasis added)*

22. Clearly this evidence has not been considered or informed which sites have been included in the submission neighbourhood plan. Solely on this basis, the allocation of site 5 should be deleted.

23. In terms of pedestrian access, whilst the requirement for a footpath to be provided to site 6 is acknowledged, this requires site 6 to be delivered first (which is not guaranteed), and the policy for site 6 does not require access through the site. This does not in fact even provide a convenient route to The Street with facilities including post office, pub, Reading Room, church, or to the bus stop at Catherine’s Well.

24. Finally, it is not clear as to when the development will come forward.

25. The NPPG states:

*“Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan” (Paragraph: 009 Reference ID: 41-009-20190509)*

26. There is no indicative delivery timetable, and no information on the intentions of the landowner. In particular, at the Call for Sites stage in September 2018, the call for sites stated:

*“It is understood that any response to this ‘Call for sites’ is provisional and at this stage does not automatically bind a landowner to make any such provisions”.*

27. Without any further information, it is not clear that development, even if allocated, would come forward, and therefore, the basic conditions are not met. This is particularly pertinent given both the current five year supply shortfall in the North



Dorset area, and the poor delivery in the current plan period. It is likely the larger villages will need to take a greater share of the housing need.

## Summary

28. As set out above, we do not consider the allocation of this site represents sustainable development, and the allocation should be deleted for not meeting the basic conditions. In particular:
- The policy requirements for the site allocation means that the site is undeliverable given the topography of the site, and is entirely above the 190m contour
  - Any development would be contrary to the evidence base and the policy as currently worded
  - The allocation of the site would require extensive hedge removal to provide safe vehicular access with an adverse landscape and visual effect on the rural road, the northern gateway to the village, and the lack of a direct footpath/pavement to the south raises concerns about pedestrian safety
  - No information has been provided on whether the site is likely to be delivered.
29. The neighbourhood plan states in paragraph 6.16 *“The rate of development will be monitored and if necessary, an early review of the plan”*. However, given there are fundamental issues with the development of **every** site proposed for allocation, the commitment to an early review is not sufficient.
30. Gleeson has promoted a site which is fully below the 190m contour line, can provide 40% affordable homes, an access can be safely provided with minimal hedgerow loss and within the existing village envelope. This site should have been allocated for 30 dwellings in order to meet the villages housing need.

**Figure 1**  
Viewpoint Taken from Bridleway E15/1 at Catherine's Well Hill, looking south east

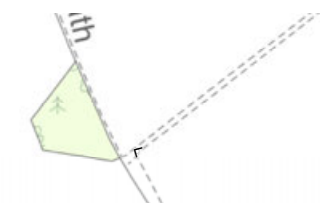






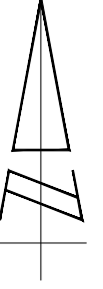
Taken from Bridleway E15/1 at Catherine's Well Hill, looking south east  
To be viewed at a comfortable arm's length and printed at A1

Figure 1



Appendix 1  
Drawing ITB14082-SK-001





REPRODUCED FROM THE ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE. LICENCE No. 100044286. © CROWN COPYRIGHT RESERVED.

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CLIENT:

GLEESON STRATEGIC LAND

REV	DATE	BY	DESCRIPTION	CHK	APD
STATUS: FOR INFORMATION					

DRAWN: JD		CHECKED: MS	APPROVED: MG
PROJECT No: ITB14082		SCALE @ A3: 1:500	DATE: 30.01.20
DRAWING No: ITB14082-SK-001			REV: -



Grove House, Lutyens Close, Chineham Basingstoke, Hampshire, RG24 8AG

Tel: 01256 338640

www.i-transport.co.uk

TITLE:

SITE 5 - POTENTIAL SITE ACCESS ARRANGEMENT

PROJECT:

LAND AT MILTON ABBAS

**Appendix 2**

Extract from LUC Strategic Landscape and Heritage Study for North Dorset Area  
Assessment of land surrounding the larger villages (October 2019)



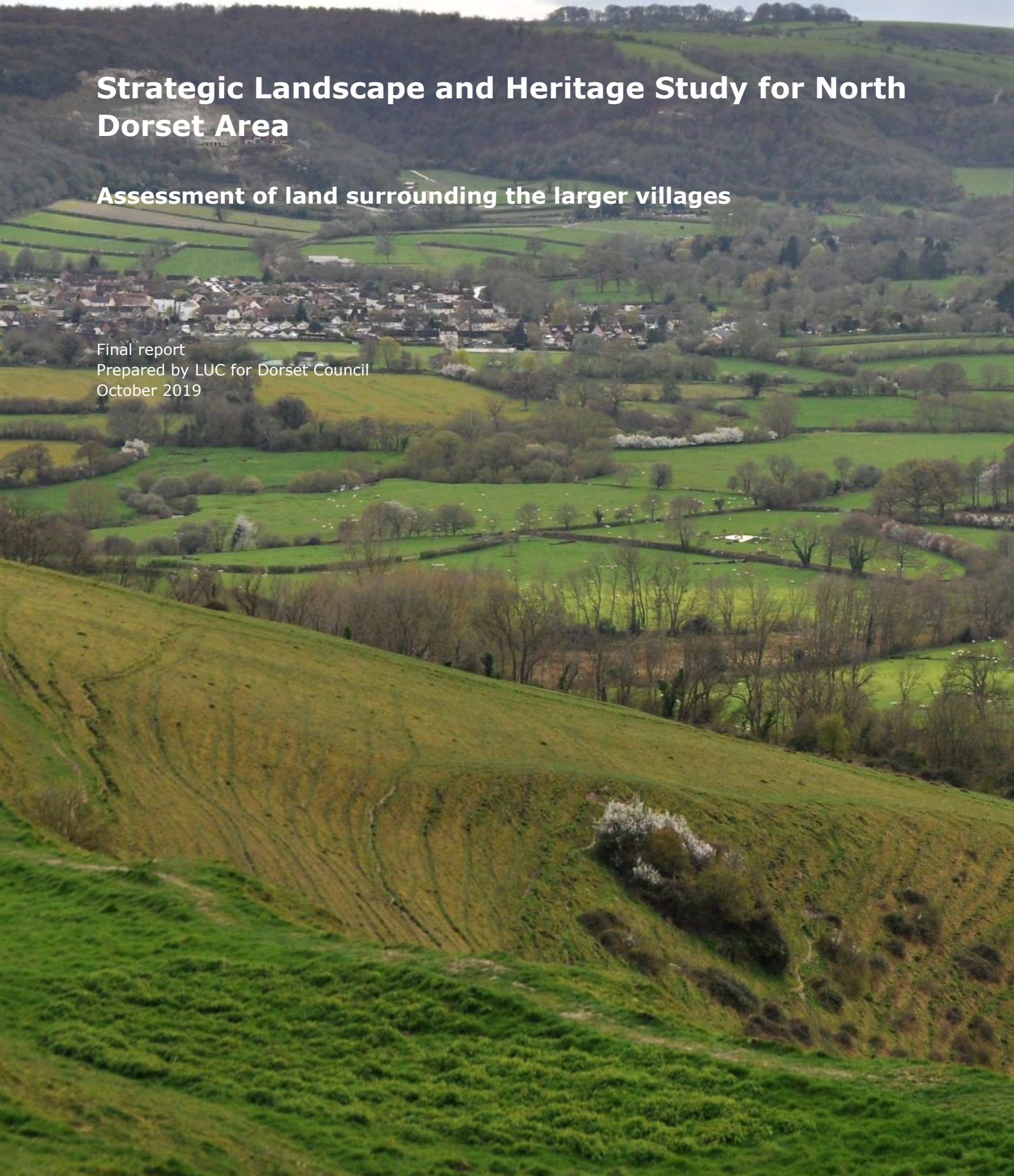


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# Strategic Landscape and Heritage Study for North Dorset Area

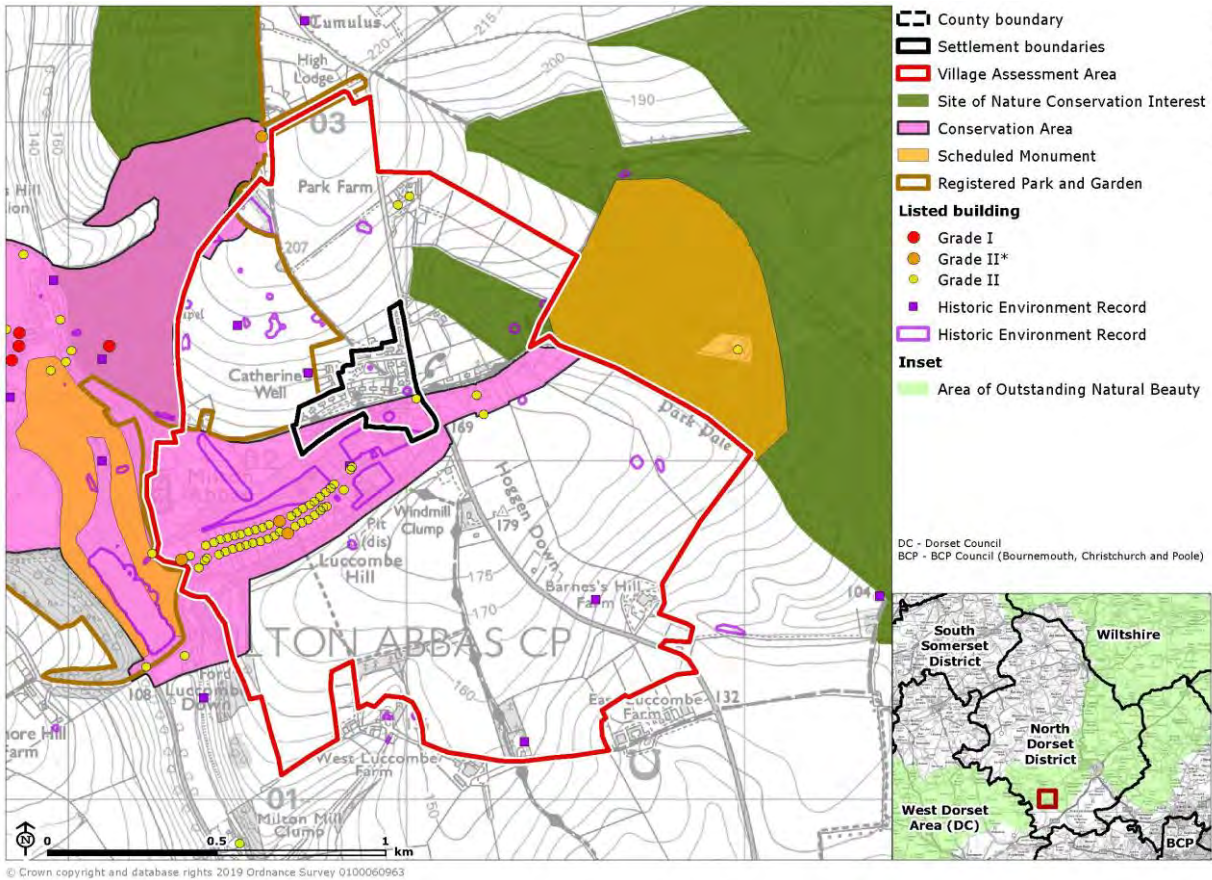
## Assessment of land surrounding the larger villages

Final report  
Prepared by LUC for Dorset Council  
October 2019



# Milton Abbas

Milton Abbas



## Representative photographs



## Location and summary of landscape character

The settlement of Milton Abbas is situated in the south of the North Dorset area and completely within the Dorset AONB, with its historic core within a steep sided valley. The south of the village and west of the assessment area is within the Upper Milborne Valley landscape character area, whilst the east is within the Upper North Winterborne Valley Landscape Character Area. The extant village was established in 1780, replacing its medieval predecessor (Middleton) which lay immediately to the west. This was demolished as part of the Earl of Dorchester’s ambitious architectural and landscape design works to the Milton Abbey estate. The planned nature of the village accounts for the homogeneity of the cob-walled, thatched estate houses and the strength of its historic character.

## Key sensitivities

### Landscape

- Complex, sloping topography surrounds the villages in all directions. The slopes culminate in elevated areas including Hoggen Down (to the south) and Houghton South Down (to the north). The valley slopes adjacent to the historic part of the village are very steeply incised.
- Characterful whitewashed cob cottages with thatched roofs are located along the valley. There is a strong sense of time-depth. These are visually screened from the modern development in the north of the village by the steep landform and thick woodland.
- Features which contribute to the natural character of the landscape including parts of Milton Park Woods site of nature conservation interest (mixed woodland habitat) and significant areas of deciduous woodland BAP priority habitat located on slopes.
- The strong network of public rights of way including the Jubilee Trail long distance route which crosses through the village. Rights of way tend to provide access to the elevated parts of the landscape surrounding the village, providing extensive views.
- Development is located on lower ground, meaning that skylines are undeveloped and often marked by woodland. Skylines on Hoggen Down are broad and expansive.
- There are long, expansive views from surrounding high ground across the adjacent countryside. Views out from the central valley are limited by the landform and vegetation, creating an intimate and enclosed character.
- Distinctive rural character with high levels of tranquillity. Existing development is well screened into the landscape, limiting the modern influences visible in the landscape.
- The entirety of the assessment area is within the nationally designated landscape of the Dorset AONB, designated for its a sense of tranquillity and remoteness, dark night skies, undeveloped rural character and a rich historic and built heritage.

### Heritage

- The HLC indicates a primarily agricultural landscape, comprised of post-medieval and modern enclosure interspersed with medieval woodland. The woodland and post-medieval enclosures have some time-depth and may feature heritage assets<sup>81</sup> that would be susceptible to physical change. Parts of the historic landscape are likely to contribute to the significance of heritage assets.
- Nearly half of the Milton Abbas Conservation Area is overlapped by the assessment area, making its special interest susceptible to change from development within and without; particularly if development alters its strong rural character, original planned coherence and/or relationship to the registered park and garden (RPG) and scheduled monument (see below).
- In the overlapped part of the conservation area there are three grade II\* listed buildings - the Church of St James [1118560]; 1-4 Tregonwell Cottages and the Reading Room [1118594] and the Old Rectory [1304949]) - and a large number of grade II listed buildings. A further two grade II listed buildings relating to Park Farm lie in the north-east of the assessment area. All of these could potentially be susceptible to physical<sup>82</sup> and setting change.
- The assessment area is adjacent to and partly overlaps the grade II\* RPG: Milton Abbey [1000721]. This asset would be highly susceptible to physical and setting change as a result of development within and without it.
- Listed Buildings in the wider vicinity with the potential to experience meaningful setting change appear to be limited to those relating to Milton Abbey (grade I and grade II), which lie both within

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<sup>81</sup> Such as hedgerows that qualify as historically important under the Hedgerow Regulations (1997), ridge and furrow earthworks and historic paths.

<sup>82</sup> Although as per the NPPF paragraph 194 substantial harm to or the loss of a Listed Building should be exceptional or wholly exceptional. Listed Building Consent would be required for or all works of demolition, alteration or extension that affects its character as a building of special architectural or historic interest. See <https://historicengland.org.uk/advice/hpg/consent/lbc> for more information.

the RPG and conservation area. However, there are also non-designated built heritage assets (e.g. West Luccombe Farm and East Luccombe Farm) in the wider area that may be susceptible to setting change.

- There are a number of scheduled monuments in the wider vicinity. Two – Milton Park Boundary Bank [1002417] and the deserted town of Milton Abbas [1002434] – lie adjacent to the assessment area.
- The physical, spatial and visual relationship between the former village site and the extant planned village of Milton Abbas (and Milton Abbey and its designed landscape) is fundamental to the significance of the scheduled monument, the conservation area and the numerous listed buildings therein. No development is likely to be acceptable at the western end of the village, as this could interrupt these relationships, potentially giving rise to extensive harm.
- Although there has been few investigations in Milton Abbas, the HER records a prehistoric cross-dyke and field systems. Other activity is mainly agricultural or extractive and dates to the post-medieval period. The undeveloped nature of the assessment area means that any hitherto unknown remains may survive well, barring truncation from plough action, landscaping, and past extractive activity. Any archaeological remains would be highly susceptible to physical change.

## Guidance and opportunities for mitigation

- Avoid development on steep slopes or areas of dramatic landform where it would be prominent in views, on skylines and out of keeping with the existing settlement pattern.
- Protect and conserve important semi-natural habitats including areas of BAP priority habitat and locally designated sites, as well as woodland, hedgerows and trees.
- Ensure any new development complements the existing form, style and vernacular of adjacent settlement.
- Maintain the public rights of way surrounding the village which provide an opportunity for people to access and appreciate the landscape and obtain views of adjacent countryside.
- Retain the overall rural and highly tranquil character of the village and its surrounds.
- Ensure any new development does not adversely affect the special qualities of Dorset AONB, including uninterrupted panoramic views, a sense of tranquillity and remoteness, dark night skies, undeveloped rural character and a rich historic and built heritage<sup>83</sup>.
- Any new development should seek to preserve or enhance the special interest of the Milton Abbas Conservation Area and elements of its setting that contribute to this interest. Due to the nature of its special interest development should not take place within or near the conservation area and opportunities for development in the wider area that do not result in harm to the historic environment will be very limited. The only feasible area identified is that within and adjacent to the existing modern development to the north of the conservation area. Here there may be the potential for some infill development, but to avoid/ minimise harm it should ideally not be permitted to extend further upslope than it already does e.g. beyond the 190m contour.
- A Local List (and GIS shapefile) of non-designated heritage assets should be compiled to ensure that proposals for development fully assess any potential impact/enhancement to such assets.
- New development should seek to preserve or enhance the heritage significance of the grade II\* Milton Abbey Registered Park and Garden and elements of its setting that contribute to this interest.
- Heritage statements would be required for any development proposals within the assessment area. Historic England would need to be consulted for any proposals with the potential to affect a grade I or II\* listed building or registered park and garden and/or scheduled monument.
- Archaeological potential, and the potential for adverse effects, will need to be clarified via desk-based assessment and potentially field evaluation. The outputs of this process should be used to inform an appropriate mitigation strategy, agreed in advance with the local authority archaeological advisor.

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<sup>83</sup> Taken from the Statement of Significance within the Dorset AONB Management Plan 2019-2024.





1. Paragraph: 009 Reference ID: 41-009-20190509 of the NPPG states:

*“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan **the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.** For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development” (emphasis added).*

2. Whilst the submission draft neighbourhood plan is not accompanied by a supporting landscape assessment of the sites proposed for allocation, the landscape impacts of potential development around Milton Abbas have been considered as part of the evidence base to support the emerging Dorset Council Local Plan.
3. In October 2019, LUC produced its Strategic Landscape and Heritage Study for North Dorset Area: Assessment of land surrounding the larger villages. As can be seen from the attached extracts of this report, under the section entitled guidance and opportunities for mitigation, part of the seventh bullet point states that:

*“Due to the nature of its special interest, development should not take place within or near the conservation area and opportunities for development in the wider area that do not result in harm to the historic environment will be very limited. The only feasible area identified is that within and adjacent to the existing modern development to the north of the conservation area. Here there may be the potential for some infill development, but to avoid/ minimise harm it should ideally not be permitted to extend further upslope than it already does e.g. beyond the 190m contour.”*

4. The site that is identified as having potential for development in landscape and heritage terms is the site being promoted by Gleeson.
5. Sites 5 and 6 represent two of the highest pieces of land around the village. The development of these two sites would clearly lead to development breaching the 190m contour, identified in LUC’s report as being significant.
6. Clearly, the LUC report has not been considered as part of the preparation of the submission draft neighbourhood plan and the development of sites 5 and 6 conflict with its findings. To accord with its findings, the allocation of site 6 should be reduced to that part of the site below the 190m contour, and the quantum of development should be reduced to around four dwellings if the requirement for parking is also retained below the 190m contour, and the density remains 15 dwellings per hectare.
7. Policy MA11 site 6 states that up to 15 dwellings will be supported. Notwithstanding the 190m contour issue above, we do not believe (that even with development above the 190m contour) 15 dwellings will be achievable at the required density (not exceeding 15 dwellings per hectare as stated in policy MA2).



If the parking area and space for the retention of the existing bridleway are removed from the total site area and root protection zones for the existing vegetation around the site boundary are allowed for, the remaining site area is less than 1 hectare. Indeed, we note that table 3.2 of the AECOM Site Assessment Report only assumes a capacity of 12 dwellings for this site at a density of 15 dwellings per hectare.

8. Finally, there is concern that there are no details of delivery of the site contrary to paragraph: 009 Reference ID: 41-009-20190509 of the NPPG which states that

*“Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan”*

9. The site is in the ownership of the parish council and a housing association, who wishes to be involved in the development of the site. It is not clear if there is a development agreement, or the timescales the parish or the housing association wish to develop the site. There is no evidence that the provision of an indicative delivery timetable has been considered.

## Summary

10. As set out above, we do not consider the allocation as currently proposed represents sustainable development, and the allocation should be deleted/amended for not meeting the basic conditions. In particular:
  - We consider that the capacity of the site should be reduced to four dwellings to reflect the area below the 190m contour, and to reflect the other constraints of the site and still meet the density requirement of 15dph set out in policy MA2.
11. The neighbourhood plan states in paragraph 6.16 *“The rate of development will be monitored and if necessary, an early review of the plan could be scheduled if there were any concerns over delivery timescales”*. However, given there are fundamental issues with the development of **every** site proposed for allocation, the commitment to an early review is not sufficient.
12. Gleeson has promoted a site which is fully below the 190m contour line, which can provide 40% affordable homes, where an access can be safely provided with minimal hedgerow loss and which lies within the existing village envelope. This site should be allocated for 30 dwellings in order to meet the village’s housing need.

**Appendix**

Extract from LUC Strategic Landscape and Heritage Study for North Dorset Area  
Assessment of land surrounding the larger villages (October 2019)



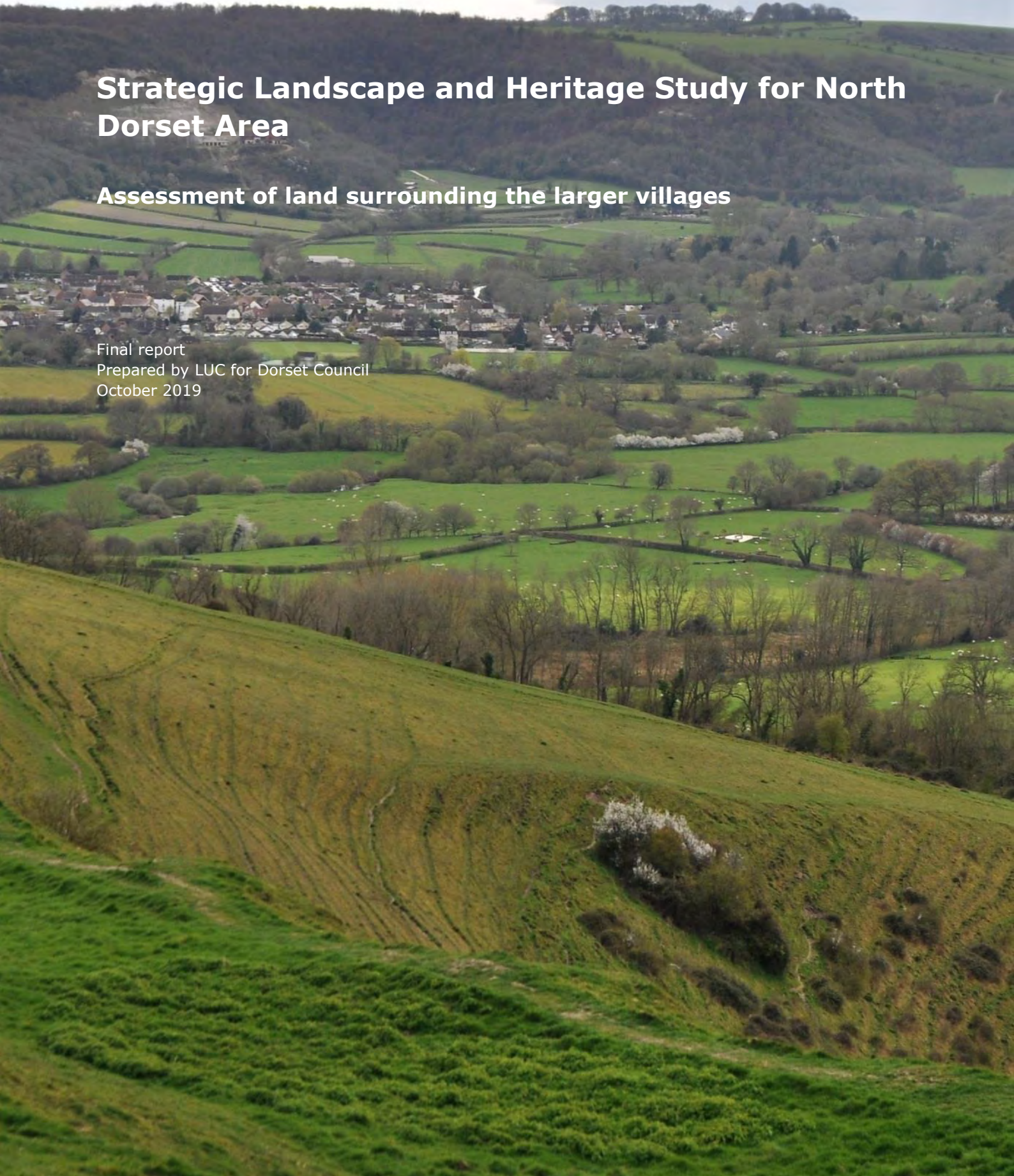


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# Strategic Landscape and Heritage Study for North Dorset Area

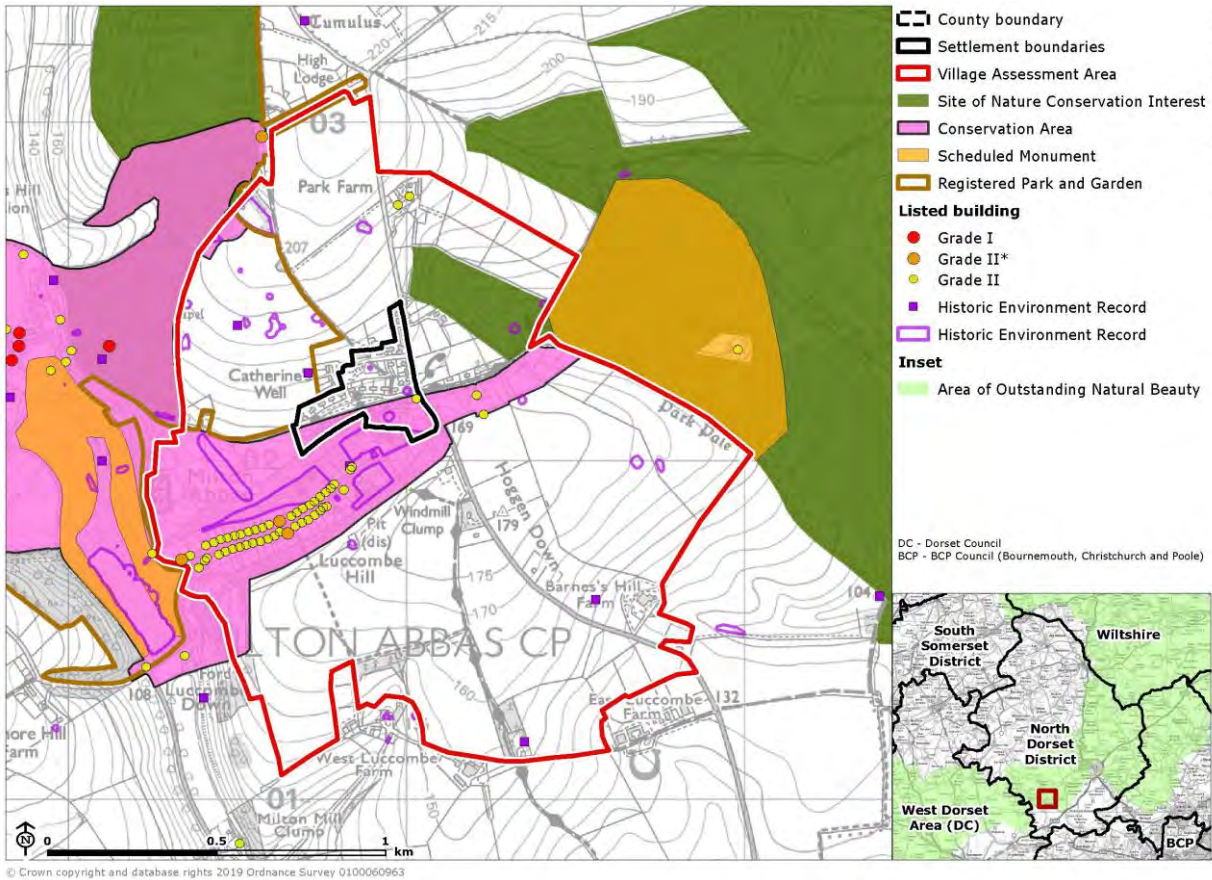
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Final report  
Prepared by LUC for Dorset Council  
October 2019



# Milton Abbas

Milton Abbas



## Representative photographs



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### Landscape

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- Archaeological potential, and the potential for adverse effects, will need to be clarified via desk-based assessment and potentially field evaluation. The outputs of this process should be used to inform an appropriate mitigation strategy, agreed in advance with the local authority archaeological advisor.

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<sup>83</sup> Taken from the Statement of Significance within the Dorset AONB Management Plan 2019-2024.



## Policy MA12: Site 8

1. Policy MA12: Site 8 Land at Catherines Well proposes the allocation of 1 dwelling.
2. It is not considered that this policy is in general conformity with the strategic policies of the adopted local plan because the site is not proposed to fall within the amended settlement boundary of Milton Abbas. All sites allocated for development should fall within the settlement boundary.
3. Whilst the submission draft neighbourhood plan proposes to amend the settlement boundary of Milton Abbas in order to accommodate other site allocations, the plan is not proposing to amend the settlement boundary to incorporate this allocation, which is clearly an inconsistency in approach. This would mean that the allocation is in conflict with the strategic Policy 20 – The Countryside in the adopted development plan, which states:

*“Development in the countryside outside defined settlement boundaries will only be permitted if:*

- a) it is of a type appropriate in the countryside, as set out in the relevant policies of the Local Plan, summarised in Figure 8.5; or*
- b) for any other type of development, it can be demonstrated that there is an ‘overriding need’ for it to be located in the countryside”*

4. The justification for not amending the settlement boundary is contained in paragraph 6.19 of the plan, which states that:

*“It would not make sense to include Site 8 within its own settlement boundary, or to extend the settlement boundary arbitrarily to link to it, but its allocation should not be seen as conflicting with the general ‘countryside’ policies that would otherwise apply to this area”.*

5. We suggest that if it is appropriate to allocate the site, then the settlement boundary should be extended to include it. Other made neighbourhood plans in North Dorset have included all their allocated greenfield housing sites within amended settlement boundaries including:

- Fontmell Magna
- Hazelbury Bryan
- Pimperne
- Shillingstone
- Sturminster Newton

6. Notwithstanding the site being located outside of the proposed new settlement boundary, the allocation of the site is also problematical in terms of the provision of a safe vehicular access. A planning application for the erection of one dwelling on this site was submitted to Dorset Council in 3 July 2019 (reference: 2/2019/0869/OUT). When commenting on the application, Dorset Council Highways stated:





*“The available visibility to the south of the junction of the private access road with the C31 is sub-standard and does not comply with the guidance provided by Manual for Streets, which requires that a 2.4m by 43m sight line be provided for a road subject to a 30mph speed limit. For this reason, the Highway Authority recommends that permission be REFUSED for the following reason:*

*The existing junction of the private access road with the C31 lacks adequate visibility and its increased use would be likely to cause additional danger to road users”.*

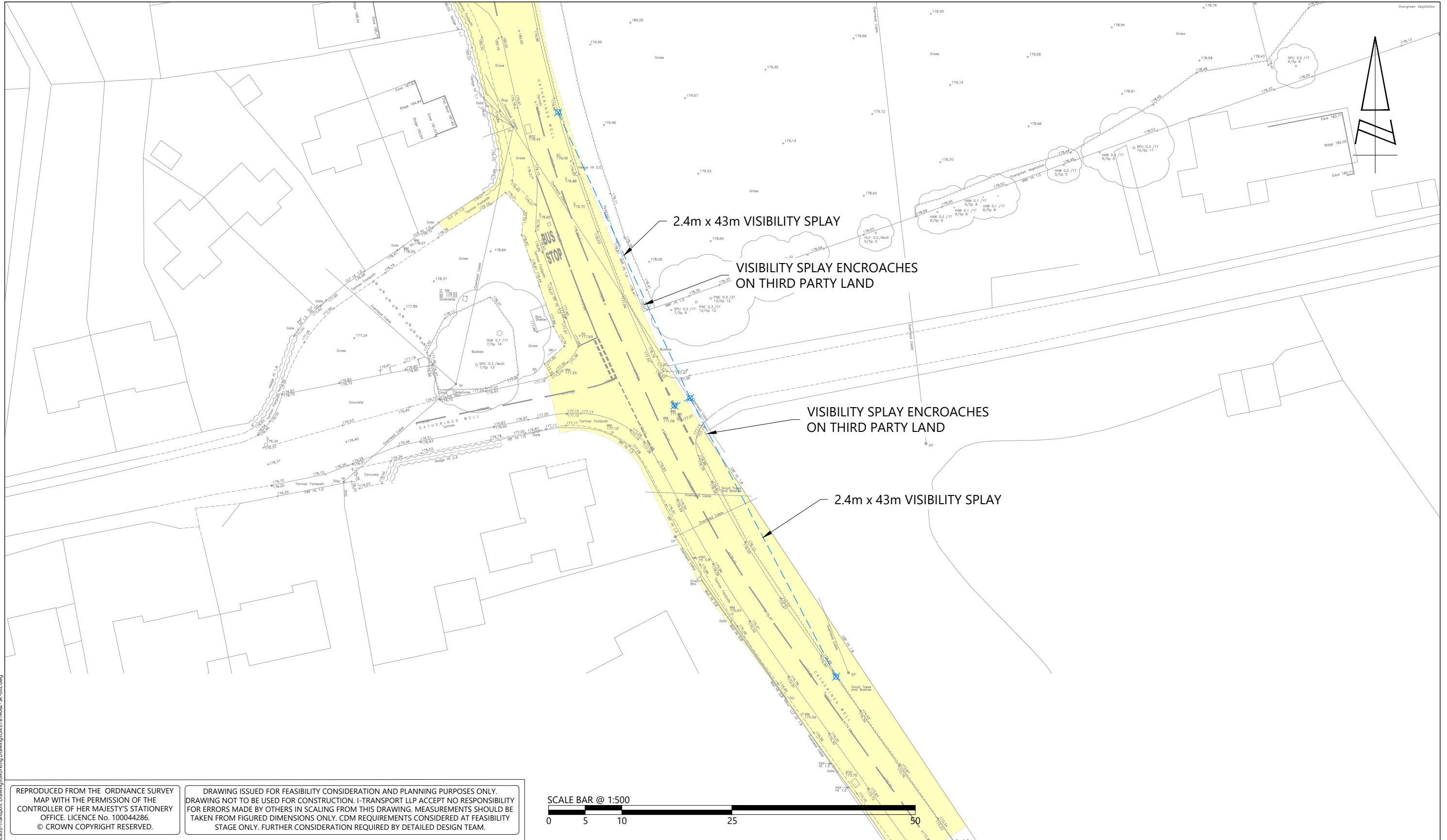
7. On behalf of Gleeson, i-Transport has prepared drawing ITB14082-SK-002 to illustrate the visibility splays and adopted highway at the junction of the private access road with the C31, and this drawing is attached to this representation.
8. The planning application was subsequently withdrawn and to date has not been resubmitted. The neighbourhood plan acknowledges in paragraph 6.84 that:

*“The Transport Development Management Team at Dorset Council has advised that the junction onto the C31 Blandford Road is currently substandard in relation to visibility splays for a 30mph speed limit area. It will therefore be important that the splay is improved as necessary (which may require the cooperation of adjoining landowners), taking into account the typical vehicle speeds along this section of road”.*

9. From a deliverability perspective, no evidence exists that the adjoining landowners on both sides of the junction are willing to make land available for the access to be widened in order to satisfy the requirements of the highway authority, or that there is an alternative solution. The allocation cannot therefore comprise sustainable development, does not meet the basic conditions and should be deleted.
10. Gleeson is promoting a site which is fully below the 190m contour line, which can provide 40% affordable homes, has an access that can be safely provided with minimal hedgerow loss, and which is located within the existing village envelope. This site should be allocated for 30 dwellings in order to meet the village’s housing need.

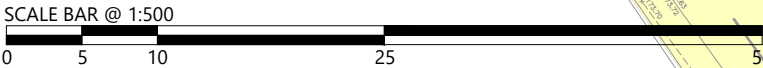
Appendix  
Drawing ITB14082-SK-002





REPRODUCED FROM THE ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE. LICENCE No. 100044286. © CROWN COPYRIGHT RESERVED.

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REV	DATE	BY	DESCRIPTION	CHK	APD
STATUS: FOR INFORMATION					

TITLE: <b>VISIBILITY FROM BRIDLEWAY</b>	
PROJECT: <b>LAND AT MILTON ABBAS</b>	CLIENT: <b>GLEESON STRATEGIC LAND</b>

DRAWN: <b>JD</b>	CHECKED: <b>MS</b>	APPROVED: <b>MG</b>
PROJECT No: <b>ITB14082</b>	SCALE @ A3: <b>1:500</b>	DATE: <b>30.01.20</b>
DRAWING No: <b>ITB14082-SK-002</b>		REV: <b>-</b>

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