

MILBORNE ST ANDREW NEIGHBOURHOOD PLAN 2018 to 2033

Submission Consultation (18 January to 1 March 2019) – Summary of Representations

| Rep # | Respondent | Summary |
|-------|------------------------------|--|
| MSA01 | Bracken Developments Limited | <p>Bracken Developments Limited supports the emerging Neighbourhood Plan with the submission of a planning application for the development of the site identified at Policy MSA5 – The Camelco Site. Planning Portal reference PP-07663896 Redevelopment, with the construction of a mixed housing, business and community use scheme including up to 61 residential units, business units and a pre-school nursery. Including a Suitable Natural Alternative Greenspace (SANG). A copy of the design and access statement and planning statement is appended as part of this consultation response. This explains the proposed Camelco site redevelopment and its adherence to Policy MSA5 and other associated proposed Neighbourhood Plan policies.</p> <p>The full response, including the design and access statement and planning statement, can be accessed via the following link: https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/milborne-st-andrew/responses/bracken-developments-combined-reduced.pdf</p> |
| MSA02 | Dorset County Council | <p>We had previously suggested that the plan made reference, or had regard to the FRA Standing Advice on Drainage & Flood Risk Policy. The specific site policies appear to have had regard to this. It must however be recognised that detailed proposals can only be confirmed through the planning application process. We have found that the Standing Advice assists this process and is thus a benefit to NHP policy implementation.</p> <p>Local Green Space LGS 10 identifies an area of highway as LGS As Highway this has a particular singular purpose and should not be designated otherwise. It is, for all intents and purpose, protected as highway and does not need any other protection. LGS allocations need to ensure that the NPPF criteria para 100 – 101 is met. Critically, and notwithstanding the above, it would appear that LGS10 does not meet any of the example criteria in NPPF 100 b. Whilst it is appreciated that it has a ‘value’ it does not need the addition constraint conferred by LGS designation. If the policy had been amended as suggested in the earlier representations such that it allowed for development which : ‘enhances or is ancillary to the primary purpose for which the land is used ’ we would not have maintained this objection As submitted DCC object to LGS 10.</p> |

| | | |
|-------|------------------|--|
| | | <p>The LGS policy should be amended such that it allows for development which enhances or is ancillary to the primary purpose for which the land is used'. This would apply to all the LGS proposed sites. As drafted the policy requires Green Belt considerations even if the development is a benefit –</p> <p>The full response, including the Standing Advice on Drainage & Flood Risk Policy, can be accessed via the following link: https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/milborne-st-andrew/responses/dorset-county-council-combined.pdf</p> |
| MSA03 | Highways England | <p>Thank you for providing Highways England with the opportunity to comment on the submission version of the Milborne St Andrew Neighbourhood Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A35 which runs to the south of the plan area. The A354 which bisects the Parish connects with the A35 at Puddletown. In general terms we are satisfied that the plan's proposed policies are unlikely to result in development which would adversely affect the SRN. We have noted the various policies and projects in relation to the A354, but these are matters for Dorset County Council to comment upon as the local highway authority. These comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time. Any large scale development proposals that may come forward which have the potential to impact on the operation of the SRN will need to be supported by a suitable transport assessment and mitigation measures in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development.</p> |
| MSA04 | Natural England | <p>MSA5 – SANG acronym is Suitable Alternative Natural Greenspace MSA9 c) “the Bere Stream corridor, which has a rural character, in places being lined with trees (willows and alders) and in others farmed up to its edges;” - Natural England advise that farming up to the edges of the stream is not best practice as it can result in soil and nutrient run-off into the river system.</p> <p>MSA5 – SANG acronym to be corrected to “Suitable Alternative Natural Greenspace”</p> |
| MSA05 | Nicola Pye | <p>I do not agree with the way that the plan submission deals with the site selection process. I regard it as flawed from the start and that it appears that the NPG settled on the Camelco site as their preferred site at an early stage and this has biased the consultation from that point on. Figure 2 in 4.3 sets out the criteria for the Site Assessment Criteria. I agree with those criteria, although at the time the NPG undertook the selection process, only 5 headline criteria (in blue) were used in the assessment. Without the subsequent more detailed explanations of the criteria and splitting some of the original criteria, the assessment was much more subjective. It is misleading to suggest that the NPG itself and then the wider community assessed potential development sites on the basis of the criteria as now set out. Using the much more limited and highly subjective assessment criteria the NPG members selected preferred sites for the initial consultation. The scoring of the sites was not given any publicity in the various consultations. Given that some sites closer to the centre of the village met many of the criteria better than the Camelco site, one has to question the objectivity of the exercise. Of the 5 sites initially identified as preferred, one site had already been withdrawn from the SHLAA by the landowner and was clearly not developable. The NPG without any consultation with the landowners proposed that the two sites on either side of Blandford Hill should be put forward on the basis of their own idea of a strip of housing fronting onto A354. This was clearly a</p> |

| | | |
|-------|-------------------------------|---|
| | | <p>nondevelopable proposal in terms of topography, traffic issues and economic viability. The village was presented with these non-deliverable options alongside Camelco and Huntley Down. This led to an unduly biased picture. At the consultation the displays of preferred sites were given undue prominence in the village hall with non-preferred sites being given little space and little explanation as to why they had been rejected. At the initial consultation almost no consideration was given to the need for employment opportunities. Had this been done I am confident that the Camelco site would have been selected as a site for commercial and not residential development given its poor siting at the top of a hill, opposite an existing commercial site on a potentially contaminated site on the wrong side of a natural settlement boundary on the road at Lane End. The next consultation event that has given rise to the biased result was the invitation to owners of the preferred sites to present their plans for development to a village audience. It was clear that the sites were at different stages in the development of their plans, from a detailed plan for Huntley down, to a conceptual design for both Camelco and the North side of the A354, to a purely conceptual plan for the Homefield site. It is unreasonable to present this as leading to a preference for the Camelco site, when much of the feedback from the consultation asked for further information from various sites before a decision could be made. The NPG has failed to address this. The Plan fails to set a settlement boundary. It is not acceptable to avoid this clear requirement of a Neighbourhood Plan. Have the NPG taken this route as they are aware that many villagers would prefer Lane End to be settlement boundary and that the Camelco site would thus be outside the boundary? The Plan includes policies which are misleading. The NPG have clearly been told by every landowner that they will not consider extensions to footpaths on agricultural land and yet in 6.23- 6.25 it is suggested that these can be overcome. This is not based on anything other a reluctance to face facts by the NPG. The Plan also includes MSA Project 1 a Community Land Trust. I consider this completely unworkable and ignores the difficulty that existing Community facilities such as the Sports Pavilion have in finding volunteers willing to devote sufficient time to managing and running these facilities.</p> |
| MSA06 | North Dorset District Council | <p>Policies Map The Policies Map is currently split across two separate pages. The Plan would benefit from having the policies map fitted onto a single page but if this is not possible, perhaps the maps could be titled east and west? Policy MSA2. Meeting Housing Needs – Dwelling Types The changes to the policy since the previous version of the plan are noted. However, the penultimate paragraph would benefit from further clarification. It currently states that “Where appropriate, conditions will be attached to planning permissions for new dwellings in order to restrict their future extension, so that the adverse impacts of any reduction in the availability of smaller, more affordable homes (including open market dwellings) can be considered.” It would seem more logical that potential adverse impacts are considered before conditions are applied in order to ascertain whether conditions are actually necessary. Policy MSA3. Meeting Employment Needs – Business Requirements The changes to the policy since the previous version of the Plan are noted and provide sufficient flexibility within the policy. Policy MSA6. Settlement Boundary NDDC considers that proposed site allocations should be located within settlement boundaries and that where allocations adjoin or fall outside existing settlement boundaries, those boundaries should be amended to take account of the gross site area of the proposed allocation. It is noted that the Milborne St Andrew Plan (at Para 4.4.2) explains why this approach has not been followed in relation to the Camelco site and that the settlement boundary may be better established as part of the site’s future development. However, this would seem to contradict the ethos of a plan-led system which underpins the town planning process. In terms of other neighbourhood plans in North Dorset that have allocated sites, examiners have concluded that sites should be included with the settlement boundary. The Council therefore recommends that that the settlement boundary is amended at this location in accord with the anticipated land take for the proposed development and to avoid future conflict with the countryside policies of the adopted North Dorset District Local Plan. Getting the revised boundaries in place at this stage will avoid the need to make changes at the neighbourhood plan review stage or</p> |

| | | |
|-------|---------------|---|
| | | <p>through the local plan review process. Policy MSA9. Reinforcing Local Landscape Character The changes to the policy since the previous version of the Plan are noted and provide a more accurate description of the landscape character around the Bere Stream. Policy MSA11. Local Green Spaces The changes to the policy since the previous version of the Plan are noted and provide greater parity with the definition of Local Green Space in the National Planning Policy Framework (NPPF). In light of the recognition that such designations should only cover areas that are demonstrably special or hold a particular local significance, it is recommended that some sites included in Table 7 would benefit from further clarification as to why they have been chosen. For example, site LGS6 – Parish Pit (Ansty Lane Common) is referred to only as a “Small area of Common Land off Dewlish Road, with chestnut trees and bench.” Para 6.16 The changes since the previous version of the Plan are noted and help provide a useful clarification of the Plan’s expectations for improving recreation opportunities. Table 8 is particularly valuable in helping to apply current Fields in Trust green space standards to the Neighbourhood Plan Area based on population and existing provision. Para 6.18 This has become a very long and wordy paragraph and would benefit from being split into two more distinct paragraphs. Policy MSA12. Improving Recreation Opportunities, and having regard to European and internationally protected sites A Habitats Regulations Assessment, and potentially an Appropriate Assessment, will be required before the Plan is examined in order to help justify the stance taken and to avoid the Plan having an adverse effect on the integrity of European and internationally important wildlife sites. Policy MSA13. Locally important character features The policy refers to “features that are particularly iconic to the character of the village”. Unfortunately, the term iconic is now vastly over-used and has become somewhat devalued as a result. Is there perhaps a more appropriate way to describe these features? Policy MSA14. Character and Design Guidance This is quite a lengthy policy, the second paragraph of which may benefit from being broken down into two more ‘digestible’ paragraphs instead. Much of the policy content could equally well have been set out as supporting text as it is rather prescriptive. If the full text is to remain as a policy, it should look and read more like a policy and not look and read like supporting text. Policy MSA15. Minimising Flood Risk As part of the earlier consultations on the plan, the Council queried whether the approach to flood risk was justified as it deviates from minimum national standards on requiring sustainable drainage on sites of 10 or more dwellings. The Council recognises that circumstances within Milborne St Andrew are not usual and, after further dialogue, it accepts that the standard approach to flooding is not likely to be sufficient to avoid increasing flood risk within the village. The Council also recognises that NPPF standards are intended as a minimum and do not prohibit a more rigorous approach, which in this case, is supported by Wessex Water.</p> |
| MSA07 | SGN | <p>Thank you for your email notifying us of the updated neighbourhood plan for Milborne St Andrew 2018-2033. After reviewing the plan I can confirm that Strategic Planning will not look to make any comments or emendations to the plan - the information included will not drive any changes to our current Strategic Plan. Thanks again for your consultation, we hope this information meets your requirements at present. If you require any further information, please do not hesitate to contact us.</p> |
| MSA08 | Sport England | <p>Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out</p> |

| | | |
|-------|--------|--|
| | | <p>in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/ Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with 2 priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthycommunities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign (Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</p> |
| MSA09 | Wessex | Our representation that was made at the pre-submission consultation on the 3 September 2018 still stands and has been submitted |

| | |
|--------------------------|--|
| <p>Strategic Limited</p> | <p>again with this form for completeness. Our objection is summarised below. Our concerns are raised on the basis of the failure of the draft plan to meet the following tests of the TCPA: • The plan fails to achieve sustainable development (TCPA, paragraph 8(d), Schedule 4B); and • The plan is not in general conformity with the strategic policies of the development plan for the authority, the North Dorset Local Plan 2016 (TCPA, paragraph 8(e). This is for the following reasons: • The plan only allocates a single site for development and does not, therefore, have sufficient flexibility to meet the strategic housing policies of the development plan; • The single site allocated is not sustainable compared to all reasonable alternatives; • The plan fails to meet its identified affordable housing needs¹ and therefore the strategic policies of the development plan; • The Neighbourhood Plan period follows the extended period of the emerging North Dorset Local Plan (up to 2033). There will be a significant uplift in its housing growth requirement dictated by the new National Planning Policy Framework (the Framework) method for calculating housing need. The plan is not capable of meeting this uplifted housing requirement and should be future proofed; • The Plan's failure to meet its housing requirements is compounded by the fact that that the plan's only allocation is not deliverable. This is due to the costs associated with bringing forward this brownfield site acting in combination with the cumulative policy burdens imposed on it. It is also not the most appropriate location for development having regard to established sustainability criteria. Other sites perform better, not least the Homefield site; and • On this basis, the plan is likely to fail to deliver the community facilities identified by the local community and described in the Neighbourhood Plan⁴. It will therefore fail to achieve a sustainable form of future development for the village. We support the point in MSA1 which states that unallocated greenfield sites outside of the settlement boundary could be released if the site would deliver substantial community benefits.</p> <p>The Neighbourhood Plan should be modified to ensure necessary flexibility exists to achieve the development needs required of it by the strategic policies of the development plan and the community facilities (and thereby the sustainable development) required of it by the local community. This would be best achieved by allocating the Homefield site for development which, by the plan's own admission, scores highly in the Sustainability Appraisal and was a 'top scoring site' in the 2017 options consultation informing the plan strategy. The Neighbourhood Plan should be modified to allocate the Homefield site. The Homefield site is the only site in the village of the type and scale that could viably deliver the village's growth requirements in a sustainable and environmentally sensitive way because it is located centrally. On this basis, we suggest that the policy we have suggested on page 10 of our attached representation is provided either in substitution or addition to Policy MSA5. (Development of the Camelco Site). If it is in addition then our recommendation is that the Camelco site is identified as a reserve to meet future development needs. It is our intention to deliver the need identified in the Neighbourhood Plan in a viable and sustainable way in one location, and therefore help the Plan to meet its objectives. For all the reasons set out above we consider this a more preferable option to splitting growth across two or more sites. We note that in order to achieve this the Proposals Map will also need to be modified to identify our site for development. It should also be noted that an application has been submitted to support the development of the Homefield site and has been assigned planning application reference 2/2018/1577/OUT. This is supported by a community facility to meet the need identified in the Neighbourhood Plan, highways improvements, deliverability statement and a SANG strategy which has been agreed with Natural England. The proposed SANG is larger than required for the Homefield site and can contribute to achieve the wider SANG strategy advanced by the Neighbourhood Plan. The planning application has been through statutory consultation and no insurmountable technical issues have been identified, proving the Homefields to be technically sound, viable and deliverable. Please read this in conjunction with the previous representation made in September 2018. It has been submitted again with this form for ease of reference.</p> |
|--------------------------|--|

| | | |
|-------|-------------|--|
| | | The full response, including the previous representation made in September 2018, can be accessed via the following link: https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/milborne-st-andrew/responses/wessex-strategic-ltd-combined.pdf |
| MSA10 | Wyatt Homes | Please see supporting letter with appendices for full representation. I am writing in response to your current Regulation 16 consultation on the submission Milborne St Andrew Neighbourhood Plan 2018 to 2033 on behalf of Lewis Wyatt (Construction) Ltd – Wyatt Homes in respect of their land interest to the north of Blandford Hill, Milborne St Andrew. This representation should be read in conjunction with Wyatt Homes’ previous representation submitted in response to the Regulation 14 consultation dated 3rd September 2018. This representation provides a response to the following submission documents: • Milborne St Andrew Neighbourhood Plan 2018 to 2033 (Submission Draft –October 2018) • Milborne St Andrew Neighbourhood Plan Basic Conditions Statement (October 2018) • Milborne St Andrew Neighbourhood Plan Consultation Statement (October 2018) • Milborne St Andrew Neighbourhood Plan Strategic Environmental Assessment (SEA) –Submission Draft Plan Environmental Report This representation responds to the following sections of the submission draft plan: • Vision and Objectives of the Plan • Supporting a working, active village –specifically the housing and healthcare needs • Promoting a walkable village and minimising potential traffic problems –specifically parking provision • Reinforcing local character and creating attractive places to live – specifically character and design guidance • Comments on the supporting Strategic Environmental Assessment Report Wyatt Homes has a current planning application (2/2018/0652/FUL) for the erection of 47 dwellings (incl. 19 affordable homes) under consideration by North Dorset District Council. As with previous representations made through the Neighbourhood Plan process a copy of the coloured character site layout plan drawing no 17180 12A submitted under application 2/2018/0652/FUL is attached at Appendix A. The layout demonstrates how the development of the site would protect the amenity of neighbouring residents through good levels of separation to adjacent properties. The density reflects the characteristics of the village and is considered an appropriate density in this edge of village location. The affordable homes are distributed in two clusters, have been designed to be architecturally indistinguishable from market homes and are located in small groups for effective long-term management. The proposal would also deliver new public open space, play area provision as well as a site for community facilities to accommodate a new pre-school and doctors surgery. Vision and Objectives of the Plan Section 3 of the submission Neighbourhood Plan on page 11 sets out the vision and objectives which are noted to support a working active village with affordable homes and access to jobs and services, promote a safe, walkable village, reinforce local character and minimise flood risk. The vision and objectives have not changed from the pre-submission draft plan and as with previous representations made during the Neighbourhood Plan process, Wyatt Homes supports these visions and objectives set out in the submission Neighbourhood Plan. In fact Wyatt Homes’ proposals north of Blandford Hill align and conform with these objectives with the sites location close to the facilities of the village and connectivity to public footpaths being of particular relevance to supporting a walkable village. The current application also demonstrates how the site would reinforce local character, with particular reference to the properties immediately adjacent to the site, contribute towards the affordable housing requirements of the village and minimise flood risk as demonstrated in the submitted Flood Risk Assessment. We remain concerned that the objective of promoting a walkable village and minimising potential transport problems has not carried through into the site selection process and therefore the vision and objectives of the Neighbourhood Plan are therefore undermined. In particular we consider that locations close to the village centre should be identified for the provision of community facilities in a manner that would encourage pedestrian movement to the facilities, rather than focussing the future location of these to the edge of the village where they would draw additional vehicle movements. The Milborne St Andrew Neighbourhood Plan Consultation Statement provides a response within the consultation |

summary table to this point on page 26. It indicates that the site is approximately 470m from the junction with Milton Road and therefore suggests that it is within relatively easy walking distance and that improvements to the pedestrian routes are planned. The response appears to reflect on the ability of new residents to walk into the village but what it does not reflect upon is whether existing villagers would be encouraged to walk up Blandford Hill to new village facilities located on the edge of the village. It is considered a less attractive proposition for existing residents to walk up the hill before having to cross the A354 to any new village facilities situated in this location and therefore is likely to encourage more vehicular trips which would not be in accordance with the vision and objectives of the plan. Provision of new village facilities in a more conveniently located position closer to the village centre would fulfil the objective of encouraging a walkable village. Supporting a working active village – Housing – Policy MSA1 The Neighbourhood Plan sets out on pages 12 and 13 and within Policy MSA1 that the projected housing need for Milborne St Andrew is about 2.8 dwellings per annum over the plan period which equates to 42 dwellings, based upon a district wide need of 285 dwellings per annum. Information contained in 'Table 1. Housing Need Figure Basis' then accounts for a higher target of 366 dwellings per annum post 2018 based upon the target for North Dorset generated by the new standard methodology for calculating housing need as set out in the National Planning Policy Framework (NPPF). Finally adjustments are made based upon completions and extant consents to identify a remaining allocation requirement in the village for 32 dwellings. The methodology set out in the submission Neighbourhood Plan for calculating housing requirements for Milborne St Andrew is based upon a 'pro-rata' proportion of the rural areas target in North Dorset's adopted Local Plan. This approach of dividing the local plan figure out on a pro-rata basis is not considered to be a sound approach to distributing development in the countryside for a number of reasons. North Dorset District Council adopted its current Local Plan, the North Dorset Local Plan Part 1 (LPP1) in January 2016. LPP1 covers the period 2011-2031. The Council has been undertaking a Local Plan Review since the adoption of the plan, a requirement of the Inspector who examined LPP1. This requirement was imposed due to the publication of new housing need evidence in the 2015 Eastern Dorset Strategic Housing Market Assessment (SHMA 2015) at the end of the examination process of LPP1. The Inspector was convinced to allow LPP1 to be adopted on an out of date evidence base subject to an immediate review with a programme for adoption of a new Local Plan by the end of 2018. NDDC has failed to meet this target and is at least 18 months behind the programme it agreed. Strategic Policies in the Local Plan relating to housing requirements are therefore based upon evidence that is over 6 years old. Local Government Re-organisation is taking place in Dorset in April 2019 with the abolition of North Dorset District Council as well as the other District and Borough Councils and the County Council. These will be replaced with two new Unitary Councils, Bournemouth, Christchurch and Poole Council covering the urban conurbation and Dorset Council covering the area beyond the urban conurbation. The geographical area currently covered by North Dorset District Council would fall within the new Dorset Council area. The Shadow Dorset Council Executive Committee met on Monday 11th February and the minutes of that meeting (Appendix B) show a clear direction of travel to no longer progress with Local Plan Reviews in the area but use current work to date to feed into a new Dorset Council Local Plan for adoption in 2023. Under these circumstances, North Dorset will be without an up to date Local Plan for a further 4 years, would be 5 years behind their commitment to the Local Plan Inspector and would continue to make decisions based upon ever increasingly out of date housing evidence. The Government has recently published its Housing Delivery Test which indicates that North Dorset fell below meeting 85% of its housing requirement over the last three years and therefore must apply a 20% buffer to its housing supply requirement. Furthermore, NDDC has an acknowledged housing supply shortfall that has fallen significantly below 5 years. The Council's last accepted position in its 2018 Annual Monitoring Report published in December 2018 indicated that it could only demonstrate 3.3 years of supply. Research, partly commissioned by Wyatt Homes and produced by Savills attached as Appendix C to this representation, provides a detailed review of the Local Plan status, history of housing delivery

in the district as well as an analysis of the 5 year housing supply position in North Dorset. This research concludes that in fact the Council's 5 year housing supply position would fall more realistically within the range of 2.03 to 2.69 years, indicating an even more significant shortfall than acknowledged by the Council. This background is entirely relevant to the examination of the Milborne St Andrew Neighbourhood Plan in determining whether it meets the basic conditions. At no point in any of the Neighbourhood Plan submission documents is there any acknowledgement that the North Dorset Local Plan Part 1 is out of date and has been for some time, nor that the Council cannot demonstrate a 5 year housing supply. The Council is in its current position due to extensive shortfall in housing delivery over the last 12 years and due to a continued reliance on a spatial strategy that directs all strategic growth to the 4 market towns (Blandford Forum, Shaftesbury, Gillingham and Sturminster Newton) in the district. Without a fundamental change in this spatial strategy to deliver some strategic growth in the more sustainable settlements such as Milborne St Andrew, housing delivery will continue to fall significantly short of meeting the needs of the area. It is requirement for the Neighbourhood Plan to be in general conformity with the strategic policies for the development plan for the area. In these circumstances, the strategic housing policies in the adopted Local Plan are considered to be out of date due to the lack of demonstrable 5 year housing supply. The submission Neighbourhood Plan is proposing to set a housing requirement for the Neighbourhood Plan area based upon an out of date strategic housing policy in the Local Plan and a failed spatial strategy. This brings into question the appropriateness of Neighbourhood Plan policy MSA1 and how a judgement of general conformity can be then made with a strategic policy in the development plan which is accepted to be out of date. Acceptance of the submission Neighbourhood Plan would effectively be an acceptance that upon the plan being made it would immediately form part of an out of date Development Plan. A further issue of distributing the rural area target across the settlements on a pro-rata basis is that the settlements in North Dorset beyond the four main market towns have a high degree of variation in their sustainability and therefore their ability to accommodate new development. Milborne St Andrew is one of the more sustainable and larger villages in North Dorset and therefore it is reasonable to expect that it would need to take a higher proportion of the countryside requirement. In the above context of the Local Plan position and the serious housing supply issue in the area it is considered that Neighbourhood Plan should look to increase its housing needs in line with projected increases and allocate more sites to ensure that it can meet these needs. Larger Family Sized Homes The submission Neighbourhood Plan seeks to maintain the emphasis on delivery of smaller homes. 'Policy MSA2: Market Housing Needs – Dwelling Types' of the Neighbourhood Plan is set out on page 14 and indicates the type and scale of housing expected in the Neighbourhood Plan Area. It states that 'larger open-market homes (with the equivalent space for four or more bedrooms) will require special justification...' This Policy remains inconsistent with the adopted North Dorset Local Plan Policy 7 on delivering homes which recognises the need for market family sized dwellings of 3 bedrooms or more. 60% of all new development in the District should be of this size and the policy is reflective of the SHMA 2015 requirement of 16% of new market houses to be 4 bedrooms or more. The suggested approach to family sized homes in the Neighbourhood Plan will put at risk the delivery of the housing needs required in the district as well as establishment of mixed communities resulting in new developments skewed towards smaller sized properties. Provision of 16% of new dwellings as 4 bedroom properties should not require 'special justification' as it would be meeting an acknowledged requirement in the most recent evidence of objectively assessed need. This policy is not considered to be in general conformity with the strategic policies in the adopted development plan and the text regarding special justification for larger 4 bedroom homes should be removed. Supporting a working active village - Healthcare The issue of Healthcare is addressed at page 16 of the Neighbourhood Plan indicating that a larger surgery would be welcomed to support the increasing population and local healthcare requirements. The submission plan has been updated to reflect upon difficulties of expansion at the existing branch surgery in the village in Milton Road Close but also identifies difficulties associated with NHS lease restrictions on NHS primary care

contracts which could result in problems with relocating to a new facility. Notwithstanding this, Wyatt Homes is supportive of the community's aspiration to see improved GP facilities in the village. Rather than including the provision of a new surgery as a delivery requirement of an allocation policy, we consider that it would be more appropriate for the Neighbourhood Plan to provide a generic expression of support for the inclusion of such a facility within proposed new developments, provided that it is in a suitable and accessible location to meet the needs of both existing and new residents. As part of Wyatt Homes current planning application under consideration, it is proposed to provide a site for two community use buildings for the purposes of delivering a new healthcare surgery and a new location for the pre-school to deliver significant public benefit alongside the residential development.

Settlement Boundary The settlement strategy should be amended to include allocated and consented sites. This is necessary to ensure consistency with the Local Plan and national guidance, as confirmed by the recent Neighbourhood Plan Examiners reports on the Pimperne and Sturminster Newton Neighbourhood Plans.

Car Parking The Neighbourhood Plan deals with the level of car parking provision required of new development in the Plan Area. Car parking provision is proposed in Policy MSA8 on page 32 and indicates 1.5 spaces for 1 bedroom units and up to 4 spaces for 4 bedroom units. Whilst we recognise a reduction in the number of spaces required for 1 bedroom units from 2 to 1.5 between the submission plan and pre-submission draft, the figures still do not conform with adopted standards in the district Development Plan which are aligned with Dorset County Council standards as set out in the Bournemouth, Poole and Dorset Residential Parking Study May 2011. The parking provision requirements are based upon survey work carried out by the Neighbourhood Plan Group which is shown in a data sample table on page 32 of the Neighbourhood Plan. The number of allocated spaces carried forward into the policy are considered to be skewed towards the high end of responses in the data samples rather than reflecting the average response, with no justification for such an approach. For example, only 22% of 204 respondents indicated that they have more than 2 cars yet all 3 and 4 bedroom properties are expected to provide 3 allocated spaces and 1 unallocated space. This is considered a disproportionate response to the evidence that has been collected which identified a low percentage of households owning more than 2 cars. The visitor allowances are also excessive when considered alongside high levels of allocated provision. There is no evidence to support these high figures attributed to both allocated and visitor spaces, in fact, the evidence points to lower levels of provision. When drawing comparisons with the Bournemouth, Poole and Dorset Residential Car Parking Study 2011, where allocated spaces are being provided sufficiently, there would not be an expectation to provide more than 0.5 spaces per dwelling and the non-allocated requirement could be as low as 0.1 or none at all. The policy still seeks to impose design requirements on the parking areas. The policy suggests that large areas of hard surfacing should be avoided, yet in demanding high levels of parking provision, a consequence of the policy is likely to be large areas of hard surfacing to accommodate such requirements. The Neighbourhood Plans proposed 'reality position' does not consider or take account the requirement in national and local plan policy to promote sustainable modes of transport. With the Neighbourhood Plan Policy requiring development to provide excessive car parking spaces, car ownership is being encouraged and unsustainable trips by private car are promoted which is inconsistent with central government objectives. It also runs contrary to the Neighbourhood Plans vision and objectives of promoting a walkable village. Wyatt Homes therefore continues to object to proposed Policy MSA8 and considers that it should be deleted from the Plan with parking standards adopted in the Local Plan and the Bournemouth, Poole and Dorset Residential Parking Study May 2011 used to inform parking requirements for future development in Milborne St Andrew.

Improving Recreation Opportunities Table 8 of the submission Neighbourhood Plan sets out what further recreation opportunities will be required from development in the Neighbourhood Plan area based upon the Fields in Trust (FIT) standards adopted in the Local Plan. Wyatt Homes welcomes the acknowledgement that the current provision of formal playing pitches is above the requirement and that no further provision will be sought by the Neighbourhood Plan. It is unclear how the open space requirements in Table 8 have been

derived;the 'requirement per 10 homes' figure does not appear to reflect FIT guidance in terms of the amount of provision. Policy MSA12a) therefore appears to be at odds with Local Plan and FIT guidance both in terms of the level of open space provision and the 10 dwelling threshold for on-site provision. The requirement for off-site improvements to have the clear support of the parish Council is also unnecessarily onerous, conflicts with the CIL regulations s106 tests, and should be removed. Wyatt Homes support in principle the need for development to improve recreation opportunities subject to planning obligations meeting the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind as set out in the Community Infrastructure Levy Regulations 2010. Character and Density Policy MSA14 - Character and Design of the submission Neighbourhood Plan continues to require new development to respond positively to local character in the village. Whilst the general aims of the policy are supported the detailed wording seeks to impose restrictions on the density of development and a minimum rear garden depth. These maximums are considered inappropriate as each proposal should be considered on its merit. The minimum rear garden depth of 10 metres is unnecessary and should be left to the merits of a proposal having regard to impact on character and amenity. In some instances a smaller rear garden maybe appropriate with greater provision to the side for example. We therefore still consider that reference to garden size should be deleted with the matter left to planning judgement when considering matters of character and amenity. The policy indicates that 'The density of housing areas should be below 20 dwellings per hectare'. Paragraph 6.29 leading up to the policy on page 46 acknowledges that "The density of development varies across the village..." it then however, leads onto suggest that the village has an average density of 17 dwellings per hectare which is used to justify the imposition of the maximum density of 20 dwellings per hectare in the policy. Wyatt Homes objects to the setting of a maximum density of 20dph for the following reasons. In considering smaller areas of Milborne St Andrew our analysis indicates a number of areas have higher densities than prescribed in the Neighbourhood Plan Policy. • St Andrews View –38 dph • Fox View – 30 dph • Hopsfield –28 dph • Coles Lane – 30 dph The suggested limit of 20 dph is not consistent with many areas of the village and it is not consistent with Government's requirements for the best use of land. Of note, when applying such density restrictions to the Neighbourhood Plans preferred option for allocation (which measures approximately 2.2 hectares) it would not leave much land available for the required community facilities and play space once the minimum of 32 dwellings has been delivered on the site. Density should not be defined as a judgement as to whether a scheme has an acceptable impact on character and appearance. The layout and design process should be used to determine whether a development responds positively to the character of an area and reinforces local distinctiveness. As such, we maintain that reference to a density maximum should be removed from policy MSA14 of the Neighbourhood Plan. Strategic Environmental Assessment (SEA) – Submission Draft Plan Environmental Report The submission Neighbourhood Plan is supported by a Strategic Environmental Assessment (SEA) dated October 2018. The SEA includes a Summary Assessment sustainability table (9b) on page 34 of policies MSA2-4 which provides an overview of potential impacts of the sites considered as potential allocations for development during the Neighbourhood Plan process. The table indicates the impacts associated with development of the land at Blandford Hill – North side. We note and welcome the update to the impact on biodiversity, fauna and flora which is now shown as 'positive impact likely'. This is consistent with the ecological survey work undertaken by Wyatt Homes and the certification of a biodiversity mitigation plan by the Dorset County Council Natural Environment Team. This work demonstrates that through development of the site the biodiversity interest of the site can in fact be enhanced and therefore should be seen as a 'positive impact' of development. The site has been shown as 'impact neutral' in respect of its impact on cultural heritage. Wyatt Homes commissioned a Historic Environment Assessment which has been submitted with the current planning application. This serves to demonstrate that the proposed development would not have an impact on cultural heritage and this impact can now be considered 'neutral'. We would therefore dispute the results shown in table

| | | |
|-------|------------------|---|
| | | <p>9b that indicate that the impact on cultural heritage is uncertain. The only impact where some adverse impact is likely is to landscape. The impact on landscape could be significantly mitigated through a sensitive landscaping strategy. In the absence of any other negative impacts now attributable to development of the site north of Blandford Hill and the assessment show a number of positive impacts associated with 'Biodiversity, fauna and flora', Housing, jobs and community' and 'Safe and accessible' Blandford Hill is considered a credible and sustainable site suitable for allocation in the Neighbourhood Plan given the current Local Plan and housing supply context. Summary In summary, Wyatt Homes considers that the site north of Blandford Hill would contribute towards meeting the vision and objectives of the Neighbourhood Plan and would be a wholly sustainable site for inclusion as an additional allocation in the Neighbourhood Plan. We raise objection however, to the methodology for calculating housing requirements in the Neighbourhood Plan Area and raise questions regarding the issue of conformity with an out of date Local Plan that has no immediate timeline for being updated. This in the context of a significant lack of housing supply raises significant concerns that the Neighbourhood Plan would be out of date as drafted as soon as it was made. Furthermore, we also raise specific objection to policies MSA2 and the limits imposed on larger family homes, MSA8 and levels of parking provision and MSA14 and the maximum limit for the density of new housing development. Whilst responding, we formally request the opportunity to participate at any future hearing session held by the Examiner. We also formally request notification of the Local Planning Authority's decision under regulation 19 in relation to the Milborne St Andrew Neighbourhood Development Plan.</p> <p>The full response, including the supporting letter with appendices, can be accessed via the following link: https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/milborne-st-andrew/responses/wyatt-homes-combined-reduced.pdf</p> |
| MSA11 | Historic England | <p>Many thanks for your Regulation 16 consultation on the submitted Milborne St Andrew Neighbourhood Plan. I can confirm that there are no issues associated with the Plan upon which we wish to comment. Previous correspondence relating to the Regulation 14 consultation exercise is attached for information.</p> <p>The full response, including correspondence relating to the regulation 14 consultation, can be accessed via the following link: https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/milborne-st-andrew/responses/historic-england-redacted-combined.pdf</p> |