

STURMINSTER NEWTON NEIGHBOURHOOD PLAN 2016 - 2031

Submission Consultation (6 April to 25 May 2018) - Summary of Representations

Note: All responses are available to view in full via www.dorsetforyou.gov.uk/sturminster-newton-neighbourhood-plan

Rep no	Respondent	Summary
SN01-1	Dorset County Council	<p>Flood risk</p> <p>The NP makes limited site specific comments in relation to flood risk and surface water in some policies. Whilst this is helpful we remain concerned that the policies, from a flood risk and drainage perspective, are too specific to individual sites to be applied to all the development areas identified or other planning applications that are submitted in the future. The plan would benefit from a general policy against which development proposals and flood risk or mitigation could be assessed.</p> <p>Suggested Additional Policy:</p> <p>All development proposals, whether greenfield or brownfield redevelopment, must give adequate consideration to all sources of flood risk and surface water management. Site characteristics and constraints should be investigated and a deliverable strategy for surface water management presented, with due consideration of climate change, in accordance with the requirements of the National Planning Policy Framework (NPPF). Dorset County Council (DCC) act as the Lead Local Flood Authority (LLFA) and statutory planning consultee in such matters, for schemes regarded as major development. Pre-application discussion is encouraged to ensure that appropriate development proposals are presented, in compliance with the NPPF.</p>
SN01-2	Dorset County Council	<p>Biodiversity</p> <ul style="list-style-type: none"> • The plan should include mention of Dorset Biodiversity Protocol as a key way of protecting and enhancing biodiversity for any development under EIA scale • Although the SEA does mention mitigating biodiversity loss from development, we are not sure that 'biodiversity gain' would be achieved by protecting hedges and carrying out landscaping within each development site. Losses of biodiversity may still occur if these are seen as the only measures of biodiversity within a development site. It is recommended that reference is made to NERC Priority Species and Habitats, as well as to the Mitigation Hierarchy. • The National Planning Policy Framework 2012 states that development should aim to secure enhancements as well as prevent losses. Reference to this should be made to this within the Neighbourhood Plan
SN01-3	Dorset County Council	<p>Object to Policy 10</p> <p>By stating that 'these important community buildings should be retained and allowed to modernise and adapt to continue to</p>

Rep no	Respondent	Summary
		<p>meet the community's needs (either in their current location or through suitable alternative provision in the Neighbourhood Plan area)....' it is effectively stating that the sites cannot be disposed of unless a suitable alternative provision is made within the town. It is not the role of a Neighbourhood Plan to specify that specific services must continue within the town. By stating that a site should be used to provide a community service and that the redevelopment of the site for alternative purposes will be strongly resisted, the NHP could frustrate the strategic rationalisation of a specific service which takes into account a wider overview of service provision. It is understandable why the plan would want to retain a service within the town however as drafted policy 10 is prejudicial to future service design. Whilst it allows for re-provision and redevelopment it does not allow for a circumstance if re-provision is not a viable option.</p> <p>Revision of text: ...and adapt to continue to meet the community's needs where service provision remains viable (either in their current location or through suitable alternative provision.</p>
SN02-2a	Gladman	<p>Vision & Objectives Gladman support the overall thrust of the vision and objectives set out within the Neighbourhood Plan. We are particularly pleased to note the intention to accommodate the growth planned for the area, but suggest that the vision and objectives set out within the plan should go further and seek to futureproof the vision for the area, in preparation for the potential growth that will be required as part of the emerging Local Plan.</p>
SN02-2b	Gladman	<p>Policy 1 – Design and character of buildings and their settings Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need to provide flexibility in order for schemes to respond to site specific circumstances and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility should be written into the wording of Policy 1 to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments.</p>
SN02-2c	Gladman	<p>Policy 2 – Important views and landscape sensitivity Policy 2 states that development will not be supported if it would adversely affect identified views. We submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views. In addition, Gladman consider that to be valued, a view would need to have some form of physical attribute, and as such the policy or supporting text must identify which views contain such a physical feature. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support.</p>
SN02-2d	Gladman	<p>Policy 7 – Housing numbers and locations Gladman suggest that wording of Policy 7 and its supporting text should explicitly state that the figures of 395 and 414 (+90) are not intended as a cap on development, and, should it become evident that further growth is needed, the plan is supportive of sustainable development opportunities in addition to the identified allocated and reserve sites.</p>

Rep no	Respondent	Summary
		<p>The policy further states that green field sites outside the settlement boundary, other than allocated or reserved sites, should not be released for development. In this regard, whilst Gladman recognise the advice on identifying 'reserve sites' contained within the PPG (ID: 41-009), we question the ability of the SNP to predetermine decisions that ought to be properly taken at the strategic level through the emerging Local Plan review process. Further housing sites, over of the above those presently identified in the SNP, may be required to meet North Dorset's strategic development needs.</p> <p>Gladman do not consider the use of settlement boundaries to be an effective response to future development proposals if they would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy. The NPPF is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the NPPF and is contrary to basic condition (a).</p>
SN02-2e	Gladman	<p>Policy 31 – Rixon and Eastern Fringe character</p> <p>Gladman are pleased to note that this policy recognises the potential to deliver sustainable development to the east of Sturminster Newton, subject to respecting the character of the Rixon Eastern Fringe area. In this regard, we believe this location could successfully accommodate a sustainable residential development proposal, which could be readily assimilated into its surroundings. As stated above however, we suggest that more flexibility should be provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone.</p>
SN02-2f	Gladman	<p>Strategic Environment Assessment</p> <p>Gladman agree with the decision to undertake an SEA to support the current consultation. However, Gladman are concerned with the assessment of the reasonable alternatives and suggest it is not clear why some sites have been rejected.</p> <p>The decision making and scoring of the SEA should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often SEA flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.</p> <p>Gladman are concerned with the assessment of reasonable alternatives and the lack of explanation as to why decisions have been made. If sites to the East of Sturminster have been rejected on landscape grounds this would conflict with Policy 31 of the SNP which recognises the development potential of this area, subject to appropriate design and mitigation measures. Gladman suggest it may therefore be appropriate to revisit the assessment of reasonable alternatives prior to submitting the SNP for independent examination to avoid the risk of the plan failing to meet basic condition (f).</p>
SN02-2g	Gladman	<p>Land off Manston Road, Sturminster Newton</p> <p>Land at Manston Road (owned by Gladman) lies immediately adjacent to the east of the Sturminster Newton settlement area. The site extends to a total area of 3.75 ha, and is contained by established hedgerows to east, west and south, and the curtilage of and existing residential property to north. Whilst Gladman acknowledge that the site has previously been discounted as a preferred development location as part of the SNP process, we believe that there are no technical or environmental constraints that would preclude a sustainable residential development proposal from coming forward in this location:</p>

Rep no	Respondent	Summary
		<ul style="list-style-type: none"> - The site could result in the delivery of further market and affordable homes to meet North Dorset's full objectively assessed needs in the short term. In accordance with the Council's adopted policy requirements, 25% of the dwellings would be provided as affordable housing; - The site could be successfully integrated its setting and surroundings. The land could be sensitively developed to respect the landscape character of the site and the surrounding area, and to minimise any harmful visual effects. - An appropriate site access to serve the development could be achieved off Manston Road, and would be accompanied by the provision of further informal footpath and cycle links. The site is situated in a sustainable location in relation to Sturminster Newton's good range of existing services and facilities, and the ability to access these by sustainable modes of transport; - Whilst the topography of the site slopes downwards from Manston Road towards the adjacent watercourse, the gradient of the site would not pose a constraint to development. Although parts of the site's eastern boundary are located in Flood Zone 3, no development will take place within these areas; - Any development proposals would result in the delivery of new public open space in a high quality landscape setting, along with more informal recreation space and landscaping to meet the needs of existing and future residents. <p>The delivery of this scheme will result in significant benefits for the local community and surrounding area including the provision of New Homes Bonus payments, increasing the economic activity of the area and provide a number of aspirations that are currently being targeted by the SNP that are not currently being planned for.</p>
SN03-2	Hall and Woodhouse	Policy 1 - Design and character of buildings and their settings – SUPPORT to secure high quality design which respects and enhances local distinctiveness
SN03-3	Hall and Woodhouse	Policy 3 - Locally Important Buildings – SUPPORT - recognition of significance of undesignated heritage assets and the need for new development to respect their significance.
SN03-4	Hall and Woodhouse	Policy 4 – Local Green Spaces – SUPPORT – detailed consideration of the Neighbourhood Plan area to protect local green spaces of local value.
SN03-5	Hall and Woodhouse	Policy 6 – Trees in the landscape – SUPPORT
SN03-6	Hall and Woodhouse	Policy 7 – Housing Numbers and Locations – SUPPORT – positive policy to meet and exceed the policy requirements in terms of the provision of the housing numbers in the North Dorset Local Plan Part 1, including on the field adjacent The Bull (policy 39)
SN03-7	Hall and Woodhouse	<p>Objection to the draft Plan where it does not meet the basic conditions. This is in respect of Policy 8 and Map 5 and the proposed settlement boundary allocations. The proposed deletion of the settlement boundary for the land adjoining The Bull is not well considered. The modification sought in order for this issue to meet the basic conditions is for the settlement boundary to be retained around the field adjacent The Bull.</p> <p>In the North Dorset Local Plan Part 1 the settlement boundary for Sturminster Newton extends to include The Bull and the</p>

Rep no	Respondent	Summary
		adjacent field and it is therefore, in principle, subject to the positive policies in the Local Plan relating to development in the four main towns, including Policy 19. In the draft Neighbourhood Plan the opportunity for development on this site to support the long term future of the designated heritage asset and valued community facility of The Bull has been recognised with a specific development allocation under Policy 39. However, at the same time the proposal is to delete the settlement boundary from the site and to review for inclusion again at a subsequent review of the Plan. This sets up a potentially unintended friction and conflict with more restrictive policies in the North Dorset Local Plan Part 1 relating to development outside of development boundaries and thus in the countryside.
SN03-8	Hall and Woodhouse	Policy 10 – Important Community Buildings and associated land – SUPPORT- and in particular identification of the pubs owned by Hall & Woodhouse as important community buildings.
SN03-9	Hall and Woodhouse	Policy 39 – Land adjoining The Bull Tavern – SUPPORT – principle and detailed considerations relating to development to secure the long term future of the public house.
SN04-1	Highways Agency	The plan’s proposed policies are unlikely to impact on our network and we therefore have no comments to make.
SN05-1	North Dorset District Council – Assets and Infrastructure	As landowners the Council support the economic development policies of the plan and in particular the proposed redevelopment of the Station Road Car Park area and the requirement to provide appropriate parking provision for the overall development. However it is important that the commercial interests of the Council are recognised when allocating usage of land within the plan and it would be sensible to involve all landowners at the earliest stage when plans are being taken to the next stage.
SN06-1a	North Dorset District Council – Planning	Para 1.1.2 Need to clarify which version of the Local Plan is being reviewed, or there is likely to be confusion in future years.
SN06-1b	North Dorset District Council – Planning	Page 10 NDDC has concerns that the NP is not providing for the most up to date level of housing need available at the time of its preparation (2015 SHMA) which for SN under the adopted local plan strategy comprises both strategic and local needs growth. As such it is considered that the stated Housing Aims might not be achievable.
SN06-1c	North Dorset District Council – Planning	Policy 5 The term ‘Important Open and Wooded Areas’ is tantamount to the North Dorset District-Wide Local Plan (2003) designation of ‘Important Open or Wooded Areas’. There is potential for confusion so we suggest that the NP term includes ‘Sturminster Newton’ to make a clear distinction between the two.
SN06-1d	North Dorset District Council – Planning	Section 4.3 The SN Housing Needs paper has been updated to refer to the 2015 SHMA and suggests what might be a pro rata increased housing figure for SN, being around 457 dwellings. This figure however is not identified in the NP itself, the LPP1 figure of a minimum of 395 continuing to be referred to. In para 4.3.2 the two proposed reserve sites appear to be linked to the need for additional housing resulting from new housing needs evidence in the Local Plan Review, and that together these could provide around 90 dwellings. However, para 4.3.4 sets out that the reserve housing sites are intended to cater for growth <i>beyond</i> 2031, Policy 7 stating ‘The release of the reserve

Rep no	Respondent	Summary
		<p>sites should be phased appropriately through the Local Plan Review, and only brought forward ahead of the end of the plan period if monitoring shows their early delivery is essential.' Para 4.3.4 sets out the scenarios engendering their early release. The first is that '...one or more of the strategic sites in SN is not deliverable within the plan period (and the minimum target of 395 homes would not then be achieved without the release of a reserve site)'. The second is that there is a significant shortfall in housing land supply across North Dorset District, triggering the national policy of a presumption in favour of sustainable development. These both present issues, the first because by using the minimum target of 395, the latest and most up to date evidence of housing need is not being taken account of, and the second because it adds nothing to what is already set out in national policy. It is considered that releasing either or both of the reserve sites to accommodate an increase in the level of SN's share of identified up to date strategic housing need before the end of the plan period would not accord with these scenarios, either individually or collectively.</p> <p>Also, whilst individual assessments of some of the proposed sites and other potential sites are included in Appendix 1 to the Pre-Submission SEA document, only cursory assessments against the SEA objectives have been undertaken of the sites that are based on housing growth areas already included in LPP1 and the proposed 'infill' sites. The District Council considers that there needs to be detailed assessments of all sites in order to establish their deliverability. In addition, the neighbourhood plan SEA should not be relying on the sustainability appraisal of LPP1 Policy 19 as that policy is a strategic policy covering a wide range of topics and whilst housing growth areas are identified, these are not specific allocations.</p>
SN06-1e	North Dorset District Council – Planning	<p>Map 5</p> <p>Allocated sites should be located within the settlement boundary. Whilst the housing growth areas identified in LPP1 are not within the settlement boundary, this is because they are just growth areas and not allocations.</p>
SN06-1f	North Dorset District Council – Planning	<p>Policy 9</p> <p>LPP1 Policy 8, which reflects national policy, sets out that developments of 11 dwellings or more will contribute to the provision of affordable housing. Evidence is needed to support the case for reducing the threshold to 10 or more at SN.</p>
SN06-1g	North Dorset District Council – Planning	<p>Policy 10</p> <p>The text in brackets seems to be referring to the community use as opposed to the building/land, which the first part of the sentence is referring to, and so does not make sense when read in the context of the sentence as a whole.</p>
SN06-1h	North Dorset District Council – Planning	<p>Policy 11</p> <p>NDDC is concerned at the quality of the evidence that has led to what can be interpreted as toddler play areas not needing to be provided on new developments as it appears to be reliant on responses to the NP consultation exercise not highlighting that the provision of toddler play areas being underprovided.</p>
SN06-1i	North Dorset District Council – Planning	<p>Map 11</p> <p>Following the submission of the NP a <u>Joint Retail and Commercial Leisure Study</u> including the North Dorset District Council area has been published. This study makes recommendations for the definition of the town centre area (TCA), primary shopping area (PSA) and shopping frontages (SF). In respect of the TCA the study considers that the proposed TCA in the NP is appropriate. However, the study recommends that separate Primary SFs and Secondary SFs are defined. The NP does not define a PSA, although to be in compliance with the NPPF, the study recommends a PSA is defined.</p>
SN06-1j	North Dorset	<p>Policy 15</p>

Rep no	Respondent	Summary
	District Council – Planning	The brackets should be removed from that part of the sentence that refers to the ‘following aspirations’ in order for the policy to read correctly.
SN06-1k	North Dorset District Council – Planning	Policy 16 Subject to the adoption of the recommendations on shopping frontages in the Joint Retail and Commercial Leisure Study, this policy would need to be revised to reflect both the PSF and SSF, and the PSA.
SN06-1l	North Dorset District Council – Planning	Policy 20 Station Road Joint Retail and Commercial Leisure Study recommends that a planning and development brief be prepared for the site to help facilitative its assembly and delivery over the plan period, and, critically, to undertake early testing of market interest and demand for the site for key end users.
SN06-1m	North Dorset District Council – Planning	Policy 21 Market Hill site Joint Retail and Commercial Leisure Study recommends that the optimum development option for the Market Hill site would be for new residential uses; potentially retirement homes, although this would need to be subject to more detailed financial/market testing.
SN06-1n	North Dorset District Council – Planning	Policy 22 Clarkes Yard site and other land at the Bath Road/Old Market Hill junction The Joint Retail and Commercial Leisure Study recommends that a planning and development brief be prepared for the site to help inform and guide its redevelopment and the optimum, most viable uses.
SN06-1o	North Dorset District Council – Planning	Policy 38 Policy 38 of the NP allows for a ‘hotel/catering primarily aimed at business users’ on Land at North Dorset Business Park. Policy 11 (Economy) in LPP1 does not allow for a hotel/catering. Potentially there is conflict between the two.
SN06-1p	North Dorset District Council – Planning	Policy 39 Land adjoining the Bull Tavern This allocation is not supported. NDDC considers that development in or adjoining the village of Newton to the south of the River Stour is inappropriate on the basis of poor access to local services and facilities. Proposals for development on this site have been considered several times over the last few years. In all instances, NDDC’s response has been consistent and robust in that it is considered that residential development on this site would be detrimental to this important key open space and to affect the special character and interest of the neighbouring heritage assets and their setting. In general, for enabling development to be supported there needs to be evidence that a listed building is physically ‘At Risk’ in any way now or in the future. Such evidence has not been provided in the case of the Bull Tavern. The policy also makes no reference to avoiding harm to heritage assets or below ground archaeology either, which are all relevant.
SN06-1q	North Dorset District Council – Planning	Policy 40 Land adjoining Barton Farmhouse NDDC considers that development in or adjoining the village of Newton to the south of the River Stour is inappropriate on the basis of poor access to local services and facilities. If the Examiner considers that the proposed allocation is appropriate, it is suggested that the 2nd bullet point is amended as follows: ‘additional native planting to retain the semi-rural character of this section of road.’
SN06-1r	North Dorset	Para 11.1.9

Rep no	Respondent	Summary
	District Council – Planning	NDDC considers that this sentence needs to be rewritten to say that planning application comments should be made to the LPA, however the TC will take into account in its consideration of planning applications any views that are shared with it.
SN06-1s	North Dorset District Council – Planning	Para 12.1.1 NDDC does not currently intend on adopting or implementing a CIL Charging Schedule. In the interim, Section 106 agreements will continue to be used in order to make acceptable development which would otherwise be unacceptable in planning terms.
SN07-1a	Streeters Carpets & Beds	Para 1.1.3 "extensive consultation" only a small response from a population of over 4355. Lots of local people still seem to be unaware of the plan or its purpose. We could not see this consultation period advertised in unity.com in last 2 issues and only a tiny ad in the bmv.
SN07-1b	Streeters Carpets & Beds	Para 3.9.2 Ref "Parking could be better located" and "the route to it circuitous" In our opinion the location is perfectly situated unfortunately access and poor signage due to recent closure by the town council of the top part of station road has led to this. Suggest modify and open top of station rd 1 way 20 mph to increase passing trade, short term parking and disabled parking to help retain post office as lost all banks, improve access to car park. How could it be better placed when it is exactly where the neighbourhood plan now see the new town centre where people can easily access all businesses the churches primary school doctors dentists library etc.
SN07-1c	Streeters Carpets & Beds	Policy 20 "creation of large outdoor motor traffic free public plaza" we think this would cause an enormous amount of disruption to the businesses in the area and massive loss of trade, for what gain, fail to see how you can build all over the car park and retain as many spaces as we have now. A wide open space could be very hard for disabled persons to cross with traffic passing through it. Do we need any more space for market stalls as they seem in decline or any more retail shops as some on the market site remain empty since construction 10 years ago and the lower site is still to be developed with retail potential. Solution: use community space and building rather than the main road i.e. the railway gardens and the exchange paved area Adjacent to Station road car park 3 large businesses currently operate and employ local people all of these could be in jeopardy if this plan goes ahead. When we have asked what would become of us they have said we would probably get an offer from a developer to be bought out this does not sound like retaining existing businesses to me.
SN08-1	Mr D Wingate	<ul style="list-style-type: none"> • Wyatts are in the process of acquiring an option on the land to the south and east of Elm Close. • Evidence of Dormice on site – these should be protected. • Elm Close is narrow and construction traffic would find access difficult. The properties on the east side of Elm Close have small gardens meaning that future development would impact severely on security, privacy and peace. • Increase in traffic via Elm Close would be intolerable to retired residents. • The junction of Elm Close and Rixon Hill is a concern regarding traffic safety. • Sturminster Newton has brownfield sites which remain untouched. • Pinch points through the town centre will become an issue with an increase in traffic. • Concern over where people will work – few jobs in Sturminster Newton. • The surgery appears to be near to bursting point and schools are nearly full. • Every town centre is witnessing shop closures due to rents, business rates and reduced margins. Shops are closing at

Rep no	Respondent	Summary
		<p>Sherborne which is far more affluent than Sturminster newton.</p> <ul style="list-style-type: none"> • Accept that there is a housing shortage but it must be addressed in the right areas.
SN09-2	Wyatt Homes	<p>Policy 2</p> <p>Extend the settlement boundaries to include the sites identified in the plan for future development. This would provide greater clarity and avoid potential conflicts with Local Plan policies that restrict development outside settlement boundaries.</p>
SN09-3	Wyatt Homes	<p>Policy 7</p> <p>Wyatt Homes are supportive of the overall approach set out in the Neighbourhood Plan, and in particular the identification of land south and east of Elm Close as an allocated / reserve site. Policies in the plan should not unduly restrict the ability to deliver sustainable development to meet identified housing needs in a timely manner.</p> <p>The housing targets in the adopted North Dorset Local Plan Part 1 (LPP1) are expressed as a minimum, and were agreed by the Inspector only on the proviso that the plan was subject to an early review, to be completed by November 2018. The most recent evidence confirms that actual housing needs are significantly higher than the 285 dwellings per annum indicated in the Local Plan, with the Local Plan Issues and Options Consultation (November 2017) suggesting a figure of 366 dwellings per annum as the most appropriate figure.</p> <p>Furthermore, housing land supply has fallen to 3.42 years. The combination of outdated housing provision in LPP1 along with the lack of a five year housing land supply and low rates of housing delivery highlight the need for the Neighbourhood Plan to identify housing numbers and sites that step beyond the LPP1 minimum target of 395 dwellings for Sturminster Newton. Sturminster Newton is one of the four main towns in North Dorset and one of the main locations for strategic growth, however housing completions in the town have averaged less than 5 per year since 2011.</p> <p>The Neighbourhood Plan's proposed phasing of the reserve sites for beyond 2031 is unnecessarily cautious; the evidence on housing need, housing delivery, and housing land supply indicates that the reserve sites are needed. We therefore suggest that the reference to the reserve sites catering for growth beyond 2031 (para 4.3.4) is removed and Policy 7 amended to identify the reserve sites as firm allocations in the Neighbourhood Plan for delivery within the current plan period.</p>
SN09-4	Wyatt Homes	<p>Policy 32</p> <p>Wyatt Homes has an interest in the land to the south and east of Elm Close. A number of technical studies have previously been prepared, including an ecological appraisal, an odour assessment, and an assessment of opportunities and constraints. These confirm the opportunity for development on the western and northern parts of the site, with the south eastern part of the site retained as green space and allotments. Wyatt Homes is in the process of updating these studies in order to inform the preparation of a planning application. Technical studies and survey findings will be shared with key stakeholders including the District Council and the Neighbourhood Planning Group. Wyatt Homes support the Neighbourhood Planning Group in its aspirations for the site and look forward to working with the Neighbourhood Planning Group and other stakeholders in taking forward the proposal.</p> <p>There are significant benefits in taking a comprehensive approach to the planning of land east of Elm Close alongside land</p>

Rep no	Respondent	Summary
		<p>south of Elm Close. As well as delivering much needed new housing for Sturminster Newton, a comprehensive approach brings with it the scope to deliver significant areas of public open space, nature conservation enhancements, and landscape planting.</p> <p>In recognition of the benefits of a comprehensive approach the planning of this area, and the evidence regarding housing need and housing land supply (as set out in our comments on Policy 7) we would be supportive of an approach that brought the reserve site forward as firm allocation in the Neighbourhood Plan.</p> <p>Whilst we recognise the need to avoid residential development in areas that may be significantly affected by odours from the sewage treatment works, the requirement for safeguarding such facilities is now addressed in Policy 24 of the emerging Bournemouth, Dorset and Poole Waste Plan, which is currently at the Examination stage. The reference at the end of Policy 32 to areas affected by odours from the sewage treatment works should be removed from the policy and replaced by a reference in the supporting text as follows: 'Residential development should not be located within areas that may be significantly affected by odours from the sewage treatment works, in accordance with Policy 24 of the Bournemouth, Dorset and Poole Waste Plan.'</p>
SN10-1	Historic England	<p>Policy 39: Land adjoining the Bull Tavern</p> <p>It is our view that the site is unsuitable for allocation in principle. We do not believe that there is sufficient evidence to justify the level of significant harm to the conservation area or demonstrate that such development is necessary - and the only way - to ensure the delivery of public benefits i.e. securing the future of the Bull Tavern. As such we do not believe that the policy and thereby the Plan is in conformity with the provisions for the protection and enhancement of the historic environment as set out in Section 12 of the National Planning Policy Framework (NPPF).</p> <p>A policy aimed at securing the future of the Bull would be acceptable in principle but worded in such a way that it did not open the door to speculative and unrelated development such as independent housing, with the quantum and type to be limited and justified by evidence on, and operational linkage to, commercial viability.</p> <p>Suggested modifications</p> <p>Deletion of the policy or reworking to simply highlight the desirability of ensuring the future of the Bull Tavern without specific reference to spatial development scenarios and highlighting the need for relevant evidence to substantiate any proposals.</p>

Representations received to the Examiner's questions, EQ1–EQ17 (September 2018)

Note: Relevant documents, including the Examiner's Questions and the responses in full, are available to view via www.dorsetforyou.gov.uk/sturminster-newton-neighbourhood-plan

Rep no	Respondent	Summary
	North Dorset District Council (NDDC) and Sturminster Newton Town Council (SNTC)	EQ1 Joint response: The Town Council is of the view that the reserve sites identified should only cater for future local needs. The approach regarding the identification of the reserve sites, and the basis for their release, has been developed following a significant amount of public consultation over a number of years. The District Council notes the views of the Town Council regarding this matter.
	NDDC & SNTC	EQ2 Joint response: In terms of the point about housing numbers, the Town Council considers that the references in the neighbourhood plan to the 395 figure (that being the 'at least' figure (up to 2031) referred to for Sturminster Newton in the LPP1) should be retained and not replaced by the housing need figure of around 457 dwellings referred to in the Sturminster Newton Housing Needs Background Paper. The Town Council considers that the matter of housing numbers, including the number at Sturminster Newton, is a strategic policy issue that should be considered by the District Council as part of its ongoing Local Plan Review. The District Council notes the Town Council's view and can confirm that the matter of housing numbers, including the approximate scale of housing development at Sturminster Newton, and the future spatial strategy for the District is being considered as part of the Local Plan Review. Further to the above, it should be noted that the plan (when taking into account the reserve sites identified) identifies sufficient land to meet the need figure of around 457 dwellings referred to in the Sturminster Newton Housing Needs Background Paper. Turning to the matter of the proposed reserve sites, as previously stated the Town Council is of the view that the reserve sites identified should only cater for future local needs. In terms of the release of the reserve sites paragraph 4.3.4 of the neighbourhood plan sets out the scenarios engendering their early release. The first is that '...one or more of the strategic sites in SN is not deliverable within the plan period (and the minimum target of 395 homes would not then be achieved without the release of a reserve site)'. As previously stated, and for reasons already set out, the Town Council considers that the references in the neighbourhood plan to the 395 figure should be retained and not replaced by the housing need figure of around 457 dwellings. In terms of the second scenario the Town Council consider that for reasons of clarity, in respect of the early release of the reserve sites, there should continue to be reference to national policy. The District Council and the Town Council consider that the existing wording relating to the second scenario should be deleted and replaced with the following text: 'one or more of the provisions set out in paragraph 14 of the revised NPPF do not apply'.

Rep no	Respondent	Summary
		<p>With regards to Appendix 1 to the Pre-submission SEA, the District Council has given further consideration to the need for detailed assessments of all sites in order to establish their deliverability. Ideally detailed assessments should have been undertaken. However, following discussions with the Town Council the District Council is satisfied that there is unlikely to be significant problems in terms of deliverability. Additionally, the deliverability of sites is a matter that will be considered again as part of the Local Plan Review.</p> <p>Further to the above, in terms of the neighbourhood plan SEA relying on the SA of the LPP1 Policy 19, the District Council considers that, ideally, the relevant policies in the neighbourhood plan should have been subject to their own individual assessment in the neighbourhood plan SEA. Nevertheless, whilst the Town Council acknowledges that Policy 19 in LPP1 is a strategic policy that considers issues other than housing, the appraisal that was carried out as part of the sustainability appraisal of LPP1 considered the housing growth areas on which the allocations are based. The appraisal also took into account the fact that the growth areas would play a significant role in meeting the requirement for at least 395 dwellings at Sturminster Newton during the period 2011-2031.</p> <p>COMMENTS ON RESPONDENTS' SUBMISSIONS:</p> <p>GLADMAN DEVELOPMENTS LTD (SN02) - In its response Gladman Developments Ltd 'suggest that wording of Policy 7 and its supporting text should explicitly state that the figures of 395 and 414 (+90) are not intended as a cap on development, and, should it become evident that further growth is needed, the plan is supportive of sustainable development opportunities in addition to the identified allocated and reserve sites.' As previously referred to, and for the reasons already set out, the Town Council considers that the neighbourhood plan should refer to the 395 figure.</p> <p>In terms of Policy 7 the first sentence of the policy refers to the fact that the plan makes provision for in excess of 395 new homes. On this basis the Town Council considers it to be clear that the 395 figure is not intended to be a cap on development. Furthermore, the Town Council considers that the wording of Policy 7 is in general conformity with the strategic policies of LPP1, in particular Policy 6 in LPP1 that states that at least 395 homes will be provided at Sturminster Newton between 2011 and 2031.</p> <p>With regards to deliverability, in paragraph 4.3.12 of its response Gladman Developments Ltd set out that it is aware that one or more sites proposed for allocation have been in the pipeline for several years, and are still to deliver any homes. The Town Council is of the view that there are unlikely to be significant problems in terms of deliverability. Additionally, as previously referred to, the deliverability of sites, including those based on housing growth areas identified in LPP1, is a matter that will be considered again as part of the Local Plan Review.</p> <p>Turning to paragraph 4.3.13 of its response, Gladman Developments Ltd refer to the fact that Policy 7 states that green field sites outside the settlement boundary, other than allocated or reserved sites, should not be released for development. Gladman Developments Ltd question the ability of the neighbourhood plan to predetermine decisions that ought to be taken at the strategic level through the emerging Local Plan review process. Gladman Developments Ltd state that further housing sites,</p>

Rep no	Respondent	Summary
		<p>over and above those presently identified in the neighbourhood plan, may be required to meet North Dorset's strategic development needs.</p> <p>The Town Council considers that the use of the word 'should' rather than 'must' in Policy 7 does not strictly preclude, in certain particular circumstances, further housing sites, beyond those identified in the neighbourhood plan, coming forward to meet North Dorset's strategic development needs. However, clearly the neighbourhood's plan aim is to steer development to those sites (allocated sites and reserve sites) identified in the plan.</p> <p>Further to the above it should be noted that the content of the neighbourhood plan, including Policy 7, would not prevent the District Council allocating further land for residential development at Sturminster Newton as part of its Local Plan Review process. Nevertheless, it is of note that paragraph 11.1.12 of the neighbourhood plan refers to points that could usefully be considered through the review of the Local Plan. One of these being that 'the limited potential for long-term growth may justify amending the status of the town as a main location for meeting strategic growth, and the appropriate phasing or triggers for the release of the 'reserve sites' in this context.' The issue of the potential for growth at Sturminster Newton over the long term and the role that the town could play in meeting the future strategic growth needs of the District will be considered by the District Council as part of the Local Plan Review.</p> <p>In terms of its comments on the SEA, that accompanies the submitted version of the plan, Gladman Developments Ltd express concerns regarding the assessment of reasonable alternatives and suggest it is not clear why some sites have been rejected. Gladman Developments Ltd go on to state 'If sites to the East of Sturminster have been rejected on landscape grounds this would conflict with Policy 31 of the SNP which recognises the development potential of the area, subject to appropriate design and mitigation measures. Gladman suggest it may, therefore, be appropriate to revisit the assessment of reasonable alternatives prior to submitting the SNP for independent examination to avoid the risk of the plan failing to meet basic condition (f).'</p> <p>In terms of the assessment of reasonable alternatives the Town Council considers that it is clear why possible development sites have been rejected. Pages 27-28 (PDF Pages 29-30) of the Sturminster Newton Neighbourhood Plan Strategic Environmental Assessment Pre-Submission Stage Environmental Report (October 2016) set out findings in respect of the assessment of alternatives sites located outside of the settlement boundary at Sturminster Newton. In addition Section 4 of the Sturminster Newton Neighbourhood Plan Strategic Environmental Assessment Submission Stage Addendum (May 2017) provides further commentary regarding the consideration of reasonable alternatives.</p> <p>Gladman Developments Ltd go on to state 'If sites to the East of Sturminster have been rejected on landscape grounds this would conflict with Policy 31 of the SNP which recognises the development potential of the area, subject to appropriate design and mitigation measures.' The Town Council notes these comments. However, paragraph 8.2.2 of the neighbourhood plan clearly details that the land which Gladman Developments Ltd has an interest in is inappropriate for development. Part of paragraph 8.2.2 of the plan states 'Land east of Manston Road is considered unsuitable for further development, particularly because the topography makes it difficult for landscaping to soften the visual impact of building in extensive wider views.'</p>

Rep no	Respondent	Summary
		<p>HALL & WOODHOUSE LTD (SN03) - The Town Council acknowledges the support from Hall & Woodhouse Ltd in respect of Policy 7. Please see the response to EQ3 below regarding comments raised by Hall & Woodhouse Ltd in terms of the settlement boundary proposed in the neighbourhood plan.</p> <p>WYATT HOMES (SN09) - Wyatt Homes suggest that Policy 7 and its supporting text should be amended to identify reserve sites as firm allocations in the neighbourhood plan for delivery within the current plan period. As previously set out, and for the reasons already detailed, the Town Council considers that the reserve sites should be retained as reserve sites and only released within the plan period on the basis of one or both of the scenarios in paragraph 4.3.4 of the plan being applicable.</p> <p>Further to the above Wyatt Homes make comments regarding Policy 32 and suggest a number of modifications. The point regarding the reserve site east of Elm Close being identified as a firm allocation has already been addressed. With regards to the reference at the end of Policy 32 to areas affected by odours, the Town Council notes Wyatt Homes view that the matter is addressed in Policy 24 of the emerging Bournemouth, Dorset and Poole Waste Plan. Nevertheless, the Waste Plan is still at examination and therefore there is no guarantee at this stage that the plan will be adopted and become part of the development plan. Additionally, the policy referred could be subject to modification or deleted. In any case the Town Council considers it worthwhile to reference the areas affected by odours from the sewage treatment works in Policy 32 of the plan to ensure that this matter is fully considered when working up a proposal/layout for the site. Given the amount of supporting text there is potential that the matter of odour from the sewage treatment works could be overlooked if it was only referred to in the supporting text.</p> <p>Please see response to EQ3 below in respect of comments made by Wyatt Homes in relation to the settlement boundary proposed in the neighbourhood plan.</p> <p>MR DAVID WINGATE (SN08) - The Town Council notes the concerns of Mr Wingate in respect of the land to the south and east of Elm Close. However, based on the findings of the SEA work undertaken and the evidence that supports the plan, the Town Council considers that there is no principle reason why the land should not be identified for possible future development. A large number of matters raised by Mr Wingate, for example access, privacy of occupiers of existing properties, highway safety, biodiversity and access to services and facilities are addressed in Policy 32 and will be considered when assessing a possible future planning application relating to residential development on the site.</p>
NDDC & SNTC		<p>EQ3 Joint response: Whilst noting that standard practice is to include allocations located on the edge of a settlement within the settlement boundary for that settlement, the Town Council wishes to ensure that such sites continue to benefit from the protection afforded by countryside policies until such time as they are built out. Although preferring the standard practice to be applied for the sake of consistency and clarity, the District Council acknowledges the Town Council's point of view. In doing so the District Council confirms that whether or not these allocations are included within the settlement boundary does not impact on the provision of affordable housing, LPP1 Policy 8 (Affordable Housing) requiring 25% of the total number of dwellings at Sturminster Newton</p>

Rep no	Respondent	Summary						
		<p>for developments both within its settlement boundary and any urban extensions to the town.</p> <p>COMMENTS ON RESPONDENTS' SUBMISSIONS:</p> <p>GLADMAN DEVELOPMENTS LTD (SN02) - The view held in paragraph 4.3.14 regarding the use of settlement boundaries is noted but not agreed with. The use of settlement boundaries aligns with the plan-led approach in national policy and guidance which seeks a controlled approach to growth.</p> <p>HALL AND WOODHOUSE LTD (SN03) – Please see TC and DC responses to EQ 13.</p> <p>WYATT HOMES (SN09) – The comments made by Wyatt Homes regarding extending the settlement boundary are noted. However, for the reasons already set out, the Town Council considers that the settlement boundary should not be amended to include sites allocated for development on the edge of the existing settlement.</p>						
	NDDC & SNTC	<p>EQ4</p> <p>JOINT RESPONSE: The reference to the figure of '10' in Policy 9 is a drafting error.</p> <p>SUGGESTED CHANGE: Replace the figure of '10' with '11' in Policy 9.</p>						
	NDDC & SNTC	<p>EQ5</p> <p>JOINT RESPONSE: Please see the suggested change below agreed by the Town Council and District Council.</p> <p>SUGGESTED CHANGE: Amend the second sentence of Policy 10 to read:</p> <p style="padding-left: 40px;">'These should be retained, and allowed to modernise and adapt, to continue enable the community facility they provide to meet the community's needs (either in their current location or through suitable alternative provision in the Neighbourhood Plan area).'</p>						
	NDDC & SNTC	<p>EQ6</p> <p>JOINT RESPONSE: Please see the suggested changes below agreed by the Town Council and District Council.</p> <p>SUGGESTED CHANGES: Amend paragraph 4.4.6 in the neighbourhood plan to read as follows:</p> <p style="padding-left: 40px;">'In support of the neighbourhood plan, work has been carried out to assess open space and recreation provision at Sturminster Newton. The following table sets out seeks to indicate, on the basis of the work carried out, whether the provision of public open spaces and recreation provision in Sturminster Newton meets, or falls short of, the standards suggested required in the 2016 North Dorset Local Plan Part 1 (2016) (the standards required in the Local Plan being the Fields in Trust (FIT) standards) and the main priorities for future provision in and around the town. These priorities are the basis of decisions to be taken under Policy 11 that follows.'</p> <p>Also, Table 6 'Open Space and Recreation Provision Priorities' should be replaced by:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Type</th> <th style="width: 40%;">Assessment</th> <th style="width: 40%;">Main priorities and recommended standards of provision</th> </tr> </thead> <tbody> <tr> <td style="height: 40px;"></td> <td></td> <td></td> </tr> </tbody> </table>	Type	Assessment	Main priorities and recommended standards of provision			
Type	Assessment	Main priorities and recommended standards of provision						

Rep no	Respondent	Summary		
		Playing pitches/formal sports	Less formal areas such as the War Memorial and Rixon Recreation Grounds provide opportunities alongside the football grounds off Honeymead Lane, but overall provision is below recommended space standards.	The main priority is to focus on improvements to the training and all weather football pitches used by the High School and Sturminster Newton United Football Club, for which contributions will be sought. See Policy 28 for more details of the proposals for this area.
		Parks, gardens and amenity green space	The town lacks these areas when assessed against the FIT standards, particularly in the older areas. Even 'double counting' the two recreation grounds there is a shortfall. They do make a significant contribution to the new housing areas in the town (such as the North Fields open space).	Amenity green spaces should be provided at a level in line with the FiT standard. This should be part of a landscaping strategy and designed for informal play.
		Equipped play areas	There are toddler play areas in the newer housing areas, but the evidence, supporting the plan, suggests existing provision of Local Areas of Play (LAPs), when considered against the FiT standard, is insufficient. The equipped play areas in the War Memorial Recreation Ground in the south of the town and Rixon in the north, aimed at children who can go out to play independently, are well-placed to serve most residents. There are currently no facilities aimed at older children and young people therefore the relevant FiT standards for this group are not being met. There are no multi-use games areas (MUGAs), however work has been completed on building a Skate Bowl on Rixon Recreation Ground.	In addition to maintaining and improving the play offer for all ages at appropriate locations, for which contributions will be sought at the equivalent FIT standards, a particular priority is to provide for older children (potentially in the education/leisure hub or within one of the main recreation areas)
		Publicly	The town appears reasonably well served	The main priority is to maintain

Rep no	Respondent	Summary		
		accessible natural green space	with Butts Pond, the open space around the Mill and Town Bridge, but is still below the recommended standards.	the existing sites and improve recreational trails around the edge of the town and linking to the countryside (see Policy 14). A further area of natural green space can also be provided within the Elm Close sites (see Policy 32), and Butts Pond LNR may be extended as part of the mitigation measures for the Market Fields site (see Policy 24). Where on-site or related offsite provision is not possible, contributions towards identified and costed projects will be sought.
		Allotments	There is a shortfall and need for more allotments, against the current local standards – the standards suggest additional allotment land is needed for the existing population.	The larger development sites, and in particular land at Elm Close (see Policy 32), should provide the opportunity to deliver much needed allotments to achieve the required standards. Where not provided on-site, contributions will be sought.

Further to the suggested changes referred to above, for reasons of clarity the Town Council and the District Council consider that the first sentence in Policy 11 (Open space and recreation provision and standards in new housing development), should be revised to read as follows:

‘Development proposals will be expected to make provision for outdoor sport and recreation in line with the standards of provision (those standards being the Fields in Trust (FiT) standards) and Neighbourhood Plan priorities set out in Table 6.’

NDDC & SNTC	EQ7 JOINT RESPONSE: The Town Council and District Council have discussed the recommendations presented in the North Dorset Joint Retail and Commercial Leisure Study 2018. With regards to the recommendation that separate Primary and Secondary Shopping Frontages are defined, in light of the content of the revised NPPF it has been agreed that there should be no change to the proposal within the submitted neighbourhood plan. The matter of retail frontages will be re-assessed as part
-------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Rep no	Respondent	Summary
		<p>of the Local Plan Review. When carrying out the re-assessment the District Council will take into account the fact that the revised NPPF does not require the identification of primary and secondary shopping frontages.</p> <p>With regards to a Primary Shopping Area, the Town Council acknowledges that the NPPF highlights the need to define one. However, both Councils agree that this matter can be dealt with as part of the Local Plan Review, subject to the neighbourhood plan stating this.</p> <p>SUGGESTED CHANGE: Insert the following sentence to the end of paragraph 5.1.3: ‘The primary shopping area has not been defined in this neighbourhood plan, but it is intended that this will be defined as part of the Local Plan Review.’</p> <p>The Councils consider that further consultation is not required in respect of this minor amendment to the text of the plan.</p>
	NDDC & SNTC	<p>EQ8</p> <p>JOINT RESPONSE: The Joint Retail and Commercial Leisure Study 2018 is part of the evidence base for the Local Plan Review. Its recommendations will inform the District Council’s considerations regarding the possible definition of shopping frontages, etc, for the towns within the District’s retail hierarchy. Such consideration will include an assessment of the frontages, etc, that had previously been defined through neighbourhood plans, thereby providing an opportunity to update the frontages, etc, if the recommendations of the joint study, together with monitoring, suggests that it would be appropriate to do so. As set out above the District Council’s considerations will take into account the fact that the revised NPPF does not require the identification of primary and secondary shopping frontages.</p>
	NDDC & SNTC	<p>EQ9</p> <p>JOINT RESPONSE: The extract from the Joint Retail and Commercial Leisure Study was included in the District Council’s response to make available the most up to date evidence relevant to Sturminster Newton town centre. It was considered that doing so would provide an opportunity for the advice within the study to be reflected in the neighbourhood plan, if it was considered appropriate to do so. The Town and District Councils are in agreement that development of the Station Road area would benefit from the preparation of a planning and development brief, as advised in the Study.</p> <p>SUGGESTED CHANGE: Add the following standalone sentence to the end of Policy 20: ‘Development of the Station Road area would benefit from the preparation of a planning and development brief.’</p> <p>COMMENTS ON RESPONDENT SUBMISSIONS:</p> <p>STREETERS CARPETS AND BEDS LTD (SN07-1) - With regard to the point made about consultation, the Town Council considers that the neighbourhood plan has been subject to extensive consultation as it has been developed. The consultation that has taken place is evidenced in the Consultation Statement submitted with the plan.</p> <p>In respect of the other comments made, the Town Council notes these. In particular, the Town Council can advise that the redevelopment of the Station Road area is aspirational and any ‘proposals’ referred to only illustrative; if a scheme was to be</p>

Rep no	Respondent	Summary
		put forward then it would be subject to full consultation, including with landowners and traders.
	NDDC & SNTC	<p>EQ10: JOINT RESPONSE: As previously outlined, the extract from the Joint Retail and Commercial Leisure Study was included in the District Council's response to make available the most up to date evidence relevant to Sturminster Newton town centre.</p>
	NDDC & SNTC	<p>EQ11: JOINT RESPONSE: As previously outlined, the extract from the Joint Retail and Commercial Leisure Study was included in the District Council's response to make available the most up to date evidence relevant to Sturminster Newton town centre. The Town and District Councils are in agreement that development of the Clarkes Yard area and land at Bath Road/Old Market Hill junction area would benefit from the preparation of a planning and development brief, as advised in the Study.</p> <p>SUGGESTED CHANGE: Add the following standalone sentence to the end of Policy 22: 'Development of Area 6 on Map 10 would benefit from the preparation of a planning and development brief.'</p>
	NDDC & SNTC	<p>EQ12 JOINT RESPONSE: The Town Council acknowledges the tension between Policy 38 in the neighbourhood plan and LPP1 Policy 11 in respect of potential hotel/catering use at the North Dorset Business Park.</p> <p>SUGGESTED CHANGE: Amend the 1st bullet point of Policy 38 as follows: 'the primary use falls within B1/B2/B8 type use or is for education/training facilities, ancillary retail of bulky goods and other uses whose main focus is business support'</p>
	NDDC & SNTC	<p>EQ13 TOWN COUNCIL RESPONSE: The Town Council acknowledges the objections raised by Historic England and the concerns raised by North Dorset District Council. However, the Town Council remains of the view that the Sturminster Newton Neighbourhood Plan should retain the land allocation outlined in the proposed policy 39. The Town Council believes that enabling the development of the land adjoining the Bull Tavern is essential to ensure the long term viability and maintenance of the listed public house.</p> <p>The Town Council remains of the view that sites allocated for development should remain outside the settlement boundary until such time as they are built out.</p> <p>DISTRICT COUNCIL RESPONSE: NDDC acknowledges that the Bull Tavern is valued as a community asset and also notes the issues that have been raised by the owner that are considered to impact upon the viability of the business, and which have led to the allocation of the land by the Town Council for 'enabling development' to secure the long-term viability and maintenance of the public house. The District Council therefore fully appreciates the intention behind the inclusion of Policy 39. NDDC also acknowledges that the plan identifies the sensitivity of the allocation site, including due to its location in the conservation area and between the listed public house and other historic buildings.</p> <p>NDDC, however, wishes to reiterate the importance of the contribution the land makes to the character of the conservation area</p>

Rep no	Respondent	Summary
		<p>and the significant harm to both that heritage asset and that of the listed public house which would result from the development proposed through the allocation. Indeed, NDDC considers that the very fact that the land, together with the adjacent cemetery, is designated in the adopted local plan as 'Important Open or Wooded Area' to be protected from development is an indication of the significant contribution it specifically makes to the character of the area.</p> <p>As Historic England and NDDC have each identified in their representations to the neighbourhood plan, evidence is required to justify the level of significant harm to the heritage assets and demonstrate that the proposed development, the 'enabling development', is necessary – and, as Historic England states, the only way - to ensure the delivery of public benefits, i.e. securing the future of the Bull Tavern. However, such evidence, as is specifically required under paragraphs 133 – 135 of the NPPF (2012) and in general terms under Planning Practice Guidance paragraph 040 Reference ID: 41-040-20160211, has not been submitted in support of the neighbourhood plan. It should be noted that Table 4 'Housing Allocations' of the neighbourhood plan gives an indicative capacity for the site of 10, meaning that affordable housing would not be required to be provided under the adopted Local Plan Part One Policy 8: Affordable Housing.</p> <p>As stated earlier, it is appreciated that the Bull Tavern is a valued community asset and that concerns exist about securing its future. To this end, as outlined in Historic England's representation it is considered that there is potentially scope for ancillary development to the public house, so designed that it would not cause undue harm to the conservation area or the setting of the Bull itself, such a level of harm being offset by the public benefits.</p> <p>The District Council's view, therefore, is that such development proposals, simply to support the viability of the listed Bull Tavern and as such limited in scale and operationally linked to the public house, can adequately be assessed under neighbourhood plan Policy 10: Important Community Buildings and Associated Land (subject to any proposed modifications) in conjunction with national and local policies that protect the historic environment. In this respect Policy 10 identifies the Bull Tavern to be of 'critical' importance to the social well-being of the community and establishes the principle that it should be retained and allowed to modernise and adapt, whilst the matter of harm to heritage assets and justification for enabling development would be appropriately assessed under LPP1 Policy 5: The Historic Environment and Section 16 of the revised NPPF.</p> <p>In addition to the significant concerns that the District Council has in respect of the harm to the heritage assets that would result from the allocation, NDDC also reiterates that development at Newton is inappropriate due to the distance to local services and facilities which are located in the town centre at Sturminster but which are not easily accessible for pedestrians due to severance issues caused by the A357.</p> <p>It is interesting to note that, in respect of Newton, paragraph 10.1.3 of the neighbourhood plan says: 'However, its status as a settlement could usefully be reconsidered as part of the Local Plan Review if it is not an appropriate location for the town's future growth.' This statement appears to suggest that there is recognition of the differing role Newton has to Sturminster, and the very fact that Policy 39 states that the allocation is for enabling development to secure the future of the Bull Tavern, clearly indicates that the site is not suitable for speculative development, which the development proposed by the allocation cannot</p>

Rep no	Respondent	Summary
		<p>primarily be considered as anything else other than.</p> <p>For the above reasons the District Council considers that Policy 39 – Land adjoining the Bull Tavern should be deleted. It should also be noted to do so would not prevent housing needs at Sturminster Newton being met.</p> <p>DISTRICT COUNCIL’S SUGGESTED CHANGE: Delete Policy 39 (Land adjoining the Bull Tavern), supporting text from paragraphs 10.5.7 to 10.5.12 inclusive and Figure 10. Amend the text accordingly throughout the plan.</p> <p>DISTRICT COUNCIL’S COMMENTS ON RESPONDENTS’ SUBMISSIONS:</p> <p>HALL & WOODHOUSE LTD (SN03-1) – Hall & Woodhouse Ltd has submitted one objection to the neighbourhood plan under section 6 of its representation and this is in respect of the deletion of the settlement boundary to exclude land the subject of Policy 39 (Land adjoining the Bull Tavern). The District Council considers that its suggested deletion of the allocation renders the objection invalid.</p> <p>However, irrespective of the fact that NDDC considers the allocation should be deleted, and despite the District Council’s stated preference for allocations to be included in the settlement boundary, in this instance it considers that excluding the site from the settlement boundary until built out would be the correct approach, the allocation of the land being specifically for enabling development to support the Bull Tavern.</p> <p>NDDC also wishes to comment on paragraph 6.2 of H&W’s representation which refers to the Bull and adjacent land being included in the existing local plan settlement boundary, and so, in principle, are subject to the policies relating to development in the four main towns. In this respect the District Council considers it important to note that the land adjacent to the Bull Tavern, together with the cemetery, is designated an Important Open or Wooded Area and under saved policy 1.9 of the 2003 North Dorset District – Wide Local Plan is therefore protected from development. As referred to earlier, the IOWA designation reaffirms the important contribution the land adjoining the Bull Tavern makes to the character of the conservation area and the village of Newton as a whole.</p> <p>HISTORIC ENGLAND (SN10-01) – Historic England’s comments, made by David Stuart, are acknowledged and the deletion of Policy 39 is suggested by the District Council. The alternative suggestion that the policy be reworked to simply highlight the desirability of ensuring the future of the Bull Tavern, etc, is considered unnecessary for the reasons outlined in the District Council’s response above.</p>
	NDDC & SNTC	<p>EQ14:</p> <p>JOINT RESPONSE: In principle the District Council considers that residential development at Newton is inappropriate due to poor access to the services and facilities at Sturminster. However, given the need for housing and the site’s proximity to the North Dorset Business Park employment area the District Council agrees that a sensitively designed housing scheme can be supported at this particular site, subject to the additional planting being identified as ‘native’.</p>

Rep no	Respondent	Summary
		<p>SUGGESTED CHANGE: Amend the 2nd bullet point of Policy 40 as follows: ‘the frontage onto the A357 retains the existing mature trees and includes additional native planting to retain the semi-rural character of this section of road’</p>
	NDDC & SNTC	<p>EQ15: JOINT RESPONSE: The Town Council acknowledges the present status regarding the adoption and implementation of a CIL Charging Schedule for North Dorset. In turn, the District Council acknowledges the Town Council’s frustration at not having direct responsibility for funding to support the identified local infrastructure projects.</p> <p>SUGGESTED CHANGE: Delete existing paragraphs 12.1.1 and 12.1.2 in the plan and replace with the paragraph below to reflect the current position regarding CIL/planning obligations. ‘Although a Community Infrastructure Levy (CIL) Charging Schedule for North Dorset has been subject to examination, and the examiner who examined the Charging Schedule concluded it is an appropriate basis on which the District Council could introduce CIL, the District Council has not adopted and implemented the Charging Schedule. Consequently, the District Council continues to make use of planning obligations , in line with the tests set out in the CIL regulations and repeated in paragraph 56 of the revised NPPF, in terms of securing contributions in respect of proposals for new development. To this end any monies collected will be spent on infrastructure and other qualifying projects at Sturminster Newton. It is anticipated that CIL will be reviewed at an appropriate time by the new Dorset unitary authority.’</p>
		<p>EQ16 JOINT RESPONSE: The Town Council considers that the key points raised by Gladman Developments Ltd (SN02), Hall & Woodhouse Ltd (SN03) and Wyatt Homes (SN09) have been dealt with in the previous responses above.</p>
		<p>EQ17: JOINT RESPONSE TO DCC SUBMISSIONS:</p> <p>DORSET COUNTY COUNCIL (SN01-1) – The Town Council notes the points raised by Dorset County Council (Flood Risk Management) in respect of the benefit that would result from a general policy being inserted into the plan against which development proposals and flood risk or mitigation could be assessed. However, the Town Council considers that there is no need to duplicate national or local policies that deal with flood risk, and there are no specific local issues which would suggest a need for a more bespoke policy in the neighbourhood plan. Section 4.1 of the neighbourhood plan makes clear that the plan should be read in conjunction with national policy and local policy (set out in LPP1).</p> <p>DORSET COUNTY COUNCIL (SN01-2) – The Town Council notes the suggestion that the submitted plan does not appear to have taken on board comments made by Dorset County Council (Natural Environment) as part of the consultation on the pre-submission version of the plan. As set out in the Consultation Statement a number of changes have been made to the plan in light of comments made by Dorset County Council at the pre-submission consultation stage; for example, with regards to the issues of ‘biodiversity gain’ and referring to the Dorset Biodiversity Protocol, the Consultation Statement details that a number of policies, and their supporting text, have been amended to take account of the principle of ‘biodiversity gain’ and what is set out in the Dorset Biodiversity Protocol. Within the plan specific references are also made to the Dorset Biodiversity Protocol.</p>

Rep no	Respondent	Summary
		<p>However, it is now considered that further changes could appropriately be made to address Dorset County Council (Natural Environment)'s concerns.</p> <p>SUGGESTED CHANGE: Relevant policies and supporting text be amended to reflect the concerns surrounding biodiversity outlined by Dorset County Council (Natural Environment) in its representation SN01-2.</p> <p>DORSET COUNTY COUNCIL (SN01-3) – Matters relating to Policy 10, including suggested re-wording, have been considered above. The Town Council does not consider that any further changes to the policy are needed to address the concerns expressed by Dorset County Council (Property). In exceptional specific circumstances an exception to the policy could be made by the decision maker on the basis of taking into account material considerations.</p>
SN02-h	Gladman	<p>Housing Requirement</p> <p>In respect of the issue of housing numbers, Gladman note the Town Council's response to our comments regarding the housing requirement being expressed as a minimum. We do however continue, for the purposes of consistency, to consider it appropriate that Policy 7 explicitly expresses any requirement as a minimum, and do not consider that the first sentence of the policy makes it clear that the figure of 395 dwellings per annum is not to be considered a cap on development.</p> <p>Further we note that the Town Council, as part of the joint response, consider that the matter of housing numbers, is a strategic issue that should be dealt with by the District Council. Therefore, we are concerned, that from the response to the Regulation 14 consultation on the pre-submission version of the SNNP, the District Council's concerns regarding the use of the most appropriate and up-to-date housing need evidence, have seemingly been disregarded.</p> <p>We do not believe, from the joint response received that this issue has been sufficiently addressed and see no evidence to suggest that the District Council are fully supportive of the decision to continue with the 395 dpa figure derived from the LPP1.</p> <p>Gladman have previously recommend that sufficient flexibility should be written into the SNNP's policies to respond to changing local circumstances, and to address the district's strategic development needs. The SNNP should acknowledge the aspirations of the Council's emerging Local Plan, including its preferences for the future direction of growth within the town and indeed the latest evidence surrounding housing need in the area. We remain concerned that the SNNP does not include that required flexibility within its policies.</p> <p>Gladman note the proposed amendments to paragraph 4.3.4 of the SNNP (replacing part of the current text with "...one or more of the provisions set out in paragraph 14 of the revised NPPF do not apply"), however we are unclear on what this change is expected to achieve, when read in conjunction with the purpose of the paragraph as a whole.</p>
SN02-i	Gladman	<p>SEA and Deliverability</p> <p>Gladman continue to express significant concerns in respect of the submitted SEA and in particular, the assessment of reasonable alternatives.</p> <p>We are not satisfied that our concerns in respect of Policy 31 of the SNNP have been sufficiently addressed, and still consider</p>

Rep no	Respondent	Summary
		<p>that insufficient commentary is provided within the SEA to demonstrate why some of the decisions have been made. We would like to reiterate our previous submissions, in so far as these emphasised that the decision making and scoring of the SEA should be robust, justified and transparent and should be based on a comparative and equal assessment of each reasonable alternative. We do not consider that the scoring of the SEA has been carried out in this manner.</p> <p>Beyond this, we note from the joint response, that North Dorset District Council are clearly still not fully satisfied that detailed assessment of the policies contained within the plan has been undertaken. The joint response states that ‘following discussions with the Town Council the District Council is satisfied that there is unlikely to be significant problems in terms of deliverability’.</p> <p>Gladman are concerned that neither the Town Council or the District Council have any evidence to support this and consider that until such evidence is provided to robustly demonstrate the deliverability of allocated sites, the policies contained within the Neighbourhood Plan cannot be considered to meet basic conditions. We have previously identified that a number of the SNNP’s proposed allocations have been in the pipeline for several years, and have still failed to deliver any homes.</p> <p>It is important to remember that the SEA process must adhere to the legal requirements of SEA Regulations 2004. If there are doubts in respect of compliance (with specific reference to statements such as “...Ideally detailed assessments should have been undertaken”), we query whether it is possible to conclude that compliance with the SEA Regulations has been achieved.</p>
SN02-j	Gladman	<p>Settlement Boundaries</p> <p>Whilst Gladman’s concerns regarding the proposed settlement boundary did not relate specifically to the exclusion of allocations from the defined boundary, we note that within the response provided by the Town and District Councils regarding the issue, there continues to be some apparent discord between both parties preference, with it being clear that the District Council would prefer a standard approach to be adopted. We suggest that an approach that is consistent with national policy and guidance and strategic policies should be adopted within a neighbourhood plan. As such, we are concerned that the Examiner’s question has not been addressed sufficiently within this response.</p>
SN03	Hall and Woodhouse	<p>Impact on the Character of the Area</p> <p>NDDC and Historic England appear to have reached a view that anything other than very minor, ancillary development related directly to The Bull would be unacceptable in this location. Detailed evidence for reaching this conclusion is not provided. The two reasons for this appear to relate to the loss of the open area and the impact on the designated and undesignated heritage assets as a result of development in this location. The two matters are separately considered.</p>
SN03	Hall and Woodhouse	<p>Important Open or Wooded Area</p> <p>There is no disagreement that under the North Dorset District-Wide Local Plan 2003, the site is allocated as an Important Open or Wooded Area in conjunction with a larger area to the east. However:</p> <ul style="list-style-type: none"> ii) as set out at paragraph 7.135 of the North Dorset Local Plan Part 1 2016 (LP1), at the examination into the 2003 Local Plan the Inspector recommended a review of these designations and in particular of their contribution in visual or amenity terms to the public areas within a town or village, with a view to deleting those which do not require complete protection. This review has never been undertaken. iii) Policy 4 on The Natural Environment of LP1 seeks, amongst other things that the landscape character of the District will

Rep no	Respondent	Summary
		<p>be protected through retention of the features that characterise the area and Policy 15 looks to retain and enhance green infrastructure, including in association with new development. The Plan sets out that Neighbourhood Plans, where produced, should review and seek the enhancement of green infrastructure (para. 7.134) as well as review Important Open or Wooded Areas (IOWAs) (para. 7.135) carried forward from the 2003 Local Plan.</p> <p>iv) In accordance with LP1, and in particular Policy 15, the Neighbourhood Plan has reviewed and set out proposed Important Open Spaces and Local Green Spaces which will supersede the IOWA designations in the 2003 Local Plan. The policy site is not proposed as such an area, although the adjoining Sturminster Newton Town Cemetery to the east of the site is included with the following description:</p> <p style="padding-left: 40px;"><i>Cemetery on rectangular sloping site incorporating Chapel of Rest and car parking. Quiet and peaceful area. Some significant trees and hedgerows and attractive views towards the town and Piddles Wood.</i></p> <p>The District Council has not sought to object to this assessment and the resultant proposals. They have not therefore raised a concern about this site being removed from IOWA (or its replacement) status.</p> <p>v) The landowner undertook its own separate landscape and visual appraisal of the opportunity to develop the site in the light of the IOWA designation. This was appended to the Submission made by Hall & Woodhouse Ltd to the Neighbourhood Plan in May 2018.</p> <p>vi) Whilst it is appreciated that the planning application is separate from the Neighbourhood Plan proposed allocation it is relevant to note that the Landscape Officer from NDDC made the following comments in relation to the application and the IOWA:</p> <p style="padding-left: 40px;"><i>Regarding the saved Policy 1.9 Important Open or Wooded Areas, the Local Plan Inspector required that a review of all IOWAs be undertaken as part of Local Plan Part 2 or through neighbourhood plans and in the interim, where a robust review of the contribution of a designated site is undertaken to support a planning application. The Draft Sturminster Newton neighbourhood plan has reviewed the IOWA found on the proposed site and deemed it not suitable for designation as a "local green space" that are proposed as replacements for the IOWA designation. Further, a robust review of the IOWA designation on the proposed site has been provided with this application via the Landscape and Visual Impact Assessment. I find no reason to object to the conclusions in either document.</i></p> <p>The current status of the land as an IOWA dates back to 2003 but it has never been reviewed, despite the recommendation of the Local Plan Inspector at that time. In accordance with the Local Plan Part 1 the Neighbourhood Plan team has undertaken a detailed review as part of the preparation of the Neighbourhood Plan and it is concluded that the site is not worthy of continued protection in this regard or allocation as a protected green space. No objection has been raised to this conclusion by any party including NDDC.</p> <p>The continuing reliance of NDDC on the significance of the designation of the IOWA to the future of this site is strongly contended to be misplaced. The Neighbourhood Plan follows the guidance in the National Planning Policy Framework and Local Plan Part 1 and there is no conflict with the basic conditions tests in this regard.</p>

Rep no	Respondent	Summary
SN03	Hall and Woodhouse	<p data-bbox="488 137 703 169">Heritage Issues</p> <p data-bbox="488 172 2145 268">In the first draft of the Plan (Pre-Submission Draft November 2016) the proposals for the Bull Tavern were covered by Policy 41. The relevant heritage issues relating to the development of the site have been identified from the outset and relevant studies commissioned by the landowner at an early stage and shared with the Town Council.</p> <p data-bbox="488 309 2145 469">It should be noted that Historic England were consulted on this earlier draft of the Plan. Historic England made no specific comments at that time on the proposed policy and allocation although they did comment on other policies and stated generally: A most impressive document in its depth and scope of coverage that draws extensively on an understanding of the historic character of the area and seeks to use this constructively positively inform change and reinforce its distinctive local identity. This is the best Plan of its kind that we have seen in the south west.</p> <p data-bbox="488 510 2047 574">The District Council had raised concerns at the previous and earlier stage of the draft Neighbourhood Plan and the Town Council responded by amplifying the policy with particular reference to heritage issues.</p> <p data-bbox="488 616 2145 839">The policy wording itself and the supporting text ensure that any proposed development must take full account of the heritage issues including the siting of the land within the designated heritage asset of the Conservation Area as well as adjoining the designated heritage asset of the pub building and non-designated heritage asset of the Chapel and adjacent buildings related to the cemetery grouping. It therefore sets out a robust framework within which the development proposals will need to be designed and subsequently assessed. The policy has therefore been very carefully drafted to ensure that explicit recognition is given to the importance of the designated and non-designated heritage assets and the need to ensure that the design solution ensures that full account is taken of each of them.</p> <p data-bbox="488 880 2145 976">It is therefore contended that the policy sets out stringent parameters for the development; there is no justification for reaching an in principle objection to the inclusion of the policy in the neighbourhood plan. There is no evidential basis to conclude that the harm would be so significant that the site is not suitable, in principle, for development.</p> <p data-bbox="488 1018 2145 1114">To reiterate the findings from the detailed analysis undertaken, and in terms of specific buildings and structures, there would be no direct impacts on statutory listed buildings or non-designated heritage assets as a result of the provision of new housing on the field or improvement works related to the Bull Tavern.</p> <p data-bbox="488 1155 2145 1390">It is acknowledged that there would be development near to The Bull and depending on the details of the proposed scheme, and the relationship of the proposals to the pub building itself, the effect upon the setting of the Bull which is a contributor to its significance will be a relevant consideration. However, it should be noted that the asset is not solely dependent upon it; its significance is also dependent upon the interest of the fabric of the building and its historic, architectural, archaeological and artistic interest. The majority of that interest will remain unaffected. Furthermore, detailed consideration of the siting of the development together with the opportunity for landscaping of the site will protect the setting of this designated heritage asset. Moreover, the proposals are to secure direct benefits for The Bull pub itself to help to secure its future.</p>

Rep no	Respondent	Summary
		<p>The same heritage considerations apply, albeit to a lesser extent, to the chapel and adjacent buildings related to the cemetery grouping. However, it is strongly contended that detailed consideration of the siting of the development together with the opportunity for landscaping along this eastern boundary of the site will protect the setting of these non-designated heritage assets.</p> <p>With regards the conservation area, it is a fact that there will be a direct effect given that development is planned within its boundary. However, the relevant consideration as made clear under <i>South Oxfordshire DC v SSE & J Donaldson</i> (March 1991, CO/1440/89) is in relation to the conservation area as a whole and not to a smaller part within or sub-area of a Conservation Area. Sturminster Newton is an extensive conservation area but there is no Conservation Appraisal undertaken by the District Council in relation to it.</p> <p>When looking at the conservation area or asset as a whole, which is the relevant basis of consideration, the degree of impact will be slight given the broad characteristics and features of this large and varied Conservation Area. The field is one small component of a very extensive Conservation Area and high quality development of part of that one field cannot be regarded as leading to substantial harm to or total loss of significance when account is taken of the Conservation Area as a whole.</p> <p>Whilst there may be some loss of openness, this can be mitigated with sufficient respect being paid to existing assets, including their setting, through appropriate design, layout and landscaping.</p> <p>The reference to enabling development in the supporting text has perhaps been interpreted by Historic England and NDDC in the narrow sense of the term. In this particular context it refers to the opportunity for the pub improvement works to be undertaken and financed through the proposed residential development on the balance of the field. The costs of developing the field are significant and the cost of the access; pub car park; access to and services for the manager's house as well as construction costs for the house as well as provision of the pub garden and flood alleviation works for the pub total some £700,000. Development is needed to secure this funding and in turn to secure the future of this pub.</p> <p>The local community values the pub but also recognises the shortcomings of the pub and the need to address these.</p> <p>Hall & Woodhouse Ltd is first and foremost a brewer and owner of an estate of over 200 pubs, primarily across the South East of England. It is not a property developer. As well as looking for opportunities to open new pubs, it keeps its existing estate under constant review. Many of the historic pubs need considerable work and updating to meet modern demands and the Company seeks to use its surplus land and sites to generate funds to reinvest in its pubs and business. This is the approach to this site, that is, to generate funds from the vacant field adjoining the public house to reinvest in improving the Bull Tavern and elsewhere in the local area as appropriate.</p> <p>As already stated the policy in the Neighbourhood Plan sets a very clear framework for the development to come forward. If there is any harm arising, and on the basis of the detailed assessments undertaken to date, such harm would be less than substantial and then it will be necessary to follow paragraph 196 of the Framework 2018 (paragraph 134 of the Framework</p>

Rep no	Respondent	Summary
		<p>2012) and to weigh any harm against the very clear public benefits: a) Helping to secure the future for the pub – a valued local community facility and designated heritage asset; b) Given the known flood risk issues, there may not be any clear alternative use for the building; c) Development of the site would make a valued contribution to much needed housing in Sturminster Newton and across district; there is no dispute that the district is unable to meet its five year housing land supply; d) In addition there is the potential for affordable housing to be provided, depending on the overall housing numbers.</p> <p>Table 4 in the Neighbourhood Plan shows an indicative capacity for the site of 10 – it cannot be said that there would be no affordable housing coming forward to add to the list of potential benefits of the site. The final number of housing units and its mix will be a matter for discussion under the terms of a specific application.</p> <p>On the basis of applying the relevant test from the Framework, it is clear that there are a number of significant and important public benefits that would more than outweigh any limited harm, should any such harm arise. The policy and supporting text are specifically written to ensure that the relevant heritage issues are set out in the clearest terms, in order to protect the significance of the designated and non-designated heritage assets.</p>
SN03	Hall and Woodhouse	<p>Sustainable Development</p> <p>The Council has raised a concern that the site is not suitable for residential development given its location and distance from the facilities in Sturminster Newton. The facts simply do not support this argument. The officers at NDDC in respect of the planning application before them for the same site have confirmed the following distances:</p> <ul style="list-style-type: none"> • Immediately adjacent the Bull Tavern and opposite the Car repair garage • 600m to the William Barnes Primary School • 700m to the Sturminster Fish and Chip Bar • 850 m to the facilities in the town centre; • 300m to playing fields • 500m to equipped play area • 650m to the North Dorset Business park and 1.2 km to the employment area off Station Road to the north. <p>Furthermore, this location is comparable if not better placed in terms of its general accessibility to Sturminster Newton’s facilities, compared with a number of the other proposed allocations, to which the Council has not raised the same concern.</p> <p>One obvious example is the proposed allocation No 12 for residential development on Land adjoining Barton Farmhouse, Newton. NDDC earlier raised an objection to this proposed allocation but have since accepted that given the need for housing and the site’s proximity to the North Dorset Business Park employment area, the District Council agrees that a sensitively designed housing scheme can be supported at this particular site, (Response to Point 14).</p> <p>NDDC appears to have raised no objection to Site allocation 10 on Map 5 and Policy 26 (land at Yewstock Fields) or to the</p>

Rep no	Respondent	Summary
		<p>largest allocation for 100 houses Site Allocation 3 and Policy 29 (North Honeymead Fields: Land North of North Fields) which are in fact further from the centre of Sturminster Newton (The Exchange) than the land at The Bull Tavern.</p> <p>Sturminster Newton is a dispersed settlement, and extends to include the communities to the south of the River Stour, at The Bridge and at Newton. From the field adjoining The Bull, there is a continuous lit, footpath, albeit of different widths, along the A357, across The Bridge and into the main centre of Sturminster Newton. Taking into account the rural location, this site is as sustainable and accessible in terms of walking and cycling to the centre of Sturminster Newton as many other parts of this settlement.</p> <p>Not only is the land at The Bull site accessible to the centre of Sturminster Newton it is also very much more accessible than the sites to the north of the settlement area to the employment opportunities at the Business Park and the community facilities at The Bull Tavern to name but two examples.</p> <p>No weight should be given to this objection. The site is within the settlement boundary of one of the major towns where development is directed and is as sustainable as many other existing and proposed residential development sites within the settlement. There is absolutely no conflict with the basic conditions in this regard.</p>
SN03	Hall and Woodhouse	<p>Housing Supply</p> <p>It is noted that the District Council has raised concerns regarding whether the Town Council is using the appropriate housing figures (minimum target of 395 as opposed to 457 being a pro rata figure taken from the 2015 SHMA). The District Council has further indicated that it is working to a higher figure than the 2015 SHMA figures for the purposes of calculating housing need for the Local Plan Review. The District Council further acknowledges the significant shortfall in housing land supply across North Dorset.</p> <p>Hall & Woodhouse do not wish to comment directly on this matter but it is clear that there is an urgent need for deliverable housing sites across the Neighbourhood Plan area and the wider district. The opportunity to bring forward this site for a number of housing units, potentially to include market housing as well as affordable housing, should be regarded as a positive public benefit.</p> <p>It is agreed that whether or not affordable housing is brought forward will depend on the final housing numbers promoted, but there is the potential for the site to contribute to the local area and wider district's urgent need for affordable housing.</p>
SN03	Hall and Woodhouse	<p>Settlement Boundary</p> <p>The points raised regarding the settlement boundary are noted, but it is confirmed that the site, as existing, lies within the settlement boundary and we remain of the view that it should continue to be an allocated site within the settlement boundary, for the reasons set out in the earlier representations and for the same reasons raised by others, including North Dorset District Council.</p> <p>The proposed allocation accords with Policy 19 of LPP1 which sets out its Sustainable Development Strategy that : Sturminster Newton will continue to function as the main service centre in the rural west of the District through: a) development and redevelopment within the settlement boundary; and</p>

Rep no	Respondent	Summary
		<p>It is acknowledged that NDDC has sought to argue a different case in respect of The Bull and argued for its exclusion from the settlement boundary but this is inconsistent with the general approach it has advocated for other sites and allocations. There is no planning justification to remove a site from within the settlement boundary which is promoted for development and with an allocation for development which is already within the settlement boundary in the adopted Local Plan.</p>
SN04	Highways Agency	<p>It would appear that the main issue that is likely to be of interest in highways terms relates to the matter of a disparity between potential future housing provision referenced in the NP of 395 dwellings compared to the 2015 SHMA figure of 457, and the identification of development sites. However, as you say the SRN is located some distance from the Sturminster Newton plan area. Trips generated by housing development of this scale, whichever figure is agreed upon, will be dispersed by the intervening local road network and therefore unlikely to have a material impact upon any given junction with the SRN. Therefore I don't think we will need to see the Councils' response in this case.</p>
SN08	Mr D Wingate	<p>Whilst I appreciate that the Town and District Councils are being put under enormous pressure by central government to achieve housing targets, my reservations remain the same. I, and many of my fellow residents of Sturminster Newton are very concerned about the town's ability to support such an increase in population, and that some of the areas being considered will impact very severely upon our quality of life. I can only hope that our feelings are considered sympathetically should plans be submitted</p>
SN09	Wyatt Homes	<p>PDF page 17; Plan page 10; Para/Section/Policy: Text Box</p> <p>The NDDC and SNTC joint response has not resolved the conflict between the strategic policies of the adopted North Dorset Local Plan Part 1 (LP1), which clearly identify Sturminster Newton as a location for strategic growth, and the emerging Neighbourhood Plan (NP), which seeks to restrict growth to local needs.</p> <p>The key strategic policies of the adopted LP1 that set the direction of growth across the District are summarised as follows:</p> <ul style="list-style-type: none"> • Policy 2: Core Spatial Strategy. The core spatial strategy at Policy 2 clearly identifies the four main towns of Blandford, Gillingham, Shaftesbury and Sturminster Newton as the key strategic settlements that are the focus for the vast majority of the District's growth. • Policy 6: Housing Distribution: Minimum housing targets for each town are set out in Policy 5, although it is recognised that the housing targets in the plan are out of date and actual needs are considerably higher. • Policy 19: Sturminster Newton: This policy aims to ensure that Sturminster Newton will continue to function as the main service centre in the rural west of the District. Housing needs are stated as a minimum, and locations for development and north and east of Sturminster Newton are identified. <p>The NP's attempt to restrict future development above the LP minimum housing requirement to local growth is at odds with the spatial strategy and clearly identified role of Sturminster Newton in meeting the strategic growth needs of the District.</p> <p>The NP therefore does not comply with the basic condition of being in general conformity with the strategic policies contained in the development plan.</p>

Rep no	Respondent	Summary
SN09	Wyatt Homes	<p data-bbox="488 137 2136 201">Wyatt Homes consider that this significant discrepancy between the NP and LP requires modification, with the focus of the NP changed to support and deliver the core spatial strategy of accommodating strategic growth at Sturminster Newton.</p> <p data-bbox="488 204 1406 236">PDF page 34/38; Plan page 27-31; Para/Section/Policy: Section 4.3</p> <p data-bbox="488 239 2069 271">This suggested change is a serious concern as it appears to ‘move the goalposts’ for the early release of the reserve sites.</p> <p data-bbox="488 309 2047 405">Throughout the preparation of the NP, there has been a clear understanding that one of the factors that would trigger the release of the reserve sites would be the District’s housing land supply falling below five years and the accompanying presumption in favour of sustainable development.</p> <p data-bbox="488 443 2136 507">The District Council has contended that the second scenario in the submission draft NP for the release of the reserve sites does not add anything to national policy, and has sought further clarification.</p> <p data-bbox="488 545 2114 641">However, the NDDC & SNTC proposed change does not provide clarification and instead has simply proposed a reference to paragraph 14 the July 2018 NPPF. The consequence of this change is a more onerous set of circumstances for the release of the reserve sites, including the 3 year land housing land supply and 45% housing delivery tests.</p> <p data-bbox="488 679 2114 775">Wyatt Homes considers that the second scenario in the submission draft NP provides an important differentiation to national policy, stating: ‘There is a significant shortfall in housing land supply across the district as a whole, triggering a presumption in favour of sustainable development as set out in national policy.’</p> <p data-bbox="488 813 2069 909">The NDDC and SNTC suggested change of replacing this with a reference to national policy is a step backwards that will frustrate the delivery of sustainable sites for housing development that are urgently needed to address a serious shortfall in housing land supply across the District.</p> <p data-bbox="488 948 2069 1011">Wyatt Homes would welcome the retention of the second scenario as worded in the submission draft NP, with some further wording to explain that this relates to the five year land supply.</p> <p data-bbox="488 1050 2136 1254">Wyatt Homes are concerned that NDDC and SNTC appear to be relying heavily on the Local Plan Review as a means of addressing the pressing housing need and land supply issues. The Local Plan Review is well way behind schedule; the previous Local Plan Inspector recommended an immediate LP review to address housing requirements, with a new plan being in place by November 2018. The LP review has not progressed to timetable, the Local Development Schedule is out of date, and officers have been unable to provide a revised timetable for the review. A new unitary council for Dorset comes into force in April 2019, and the transitional arrangements in relation to adopted and emerging Local Plan policies remain unclear.</p> <p data-bbox="488 1292 2136 1423">Wyatt Homes consider that the combination of out of date LP housing requirements, slow progress on the LP review, and uncertainty over future strategic plan-making arrangements, are such that the NP examination process should re-test the housing requirement figure for the area as set out in paragraph 65 of the NPPF. The 457 dwellings identified in the SN housing needs paper represents a useful starting point for a minimum requirement.</p>

Rep no	Respondent	Summary
SN10	Historic England	<p>Wyatt Homes consider that the status of the reserve sites and their criteria for release are central to whether or not the NP can be considered to meet the basic conditions. The suggested changes appear to have been hastily drawn up and the consequences not fully thought through. Wyatt Homes requests that the suggested change is not made. Should the Examiner be minded to consider it further, we would welcome the opportunity for a hearing session.</p> <p>We do not feel that the responses now made generate new issues upon which further comment from us is required.</p>

Representations received to the Examiner's further question, EQ18 (October 2018)

Note: Relevant documents, including the Examiner's Questions and the responses in full, are available to view via www.dorsetforyou.gov.uk/sturminster-newton-neighbourhood-plan

Rep no	Respondent	Summary
	SNTC	<p>i) Am I right in my understanding of Policy 4, about which I have no representations, that it supersedes IOWA in the SNNP area?</p> <p>Sturminster Newton Town Council (SNTC) confirms that the intention of Policy 4 (Local Green Spaces) in the submission version of the Sturminster Newton Neighbourhood Plan 2016-2031 is for it to supersede Important Open or Wooded Areas (IOWAs), as set out in the North Dorset Local Plan (2003)s. IOWAs and other open areas were assessed against the criteria in the National Planning Policy Framework (NPPF) relating to Local Green Spaces (LGSs) and the most valued spaces designated as LGS, and, as outlined in paragraph 4.2.13 of the neighbourhood plan, effectively replace the IOWA policy areas that were carried forward from the previous Local Plan.</p> <p>SNTC advises that the NP team assessed the land adjacent to the Bull Tavern, and its importance as an open space, when they carried out the assessment of each proposed housing site. The outcome of this assessment was then considered in the public consultation events in November 2015 and February 2016.</p>
	NDDC	<p>i) Am I right in my understanding of Policy 4, about which I have no representations, that it supersedes IOWA in the SNNP area?</p> <p>North Dorset District Council (NDDC) considers that, in terms of Policy 4 superseding the IOWA designation in the plan area, a neighbourhood plan policy cannot delete a local plan policy. Land that is already designated as an IOWA in the neighbourhood plan area will retain such a designation until the point at which the designation is possibly deleted or replaced as part of the North Dorset Local Plan Review process.</p> <p>In any event NDDC considers it should be noted that although the evidence base document reference 13C.1, Local Character Summary Report (January 2017), states that all previously designated open/wooded areas were assessed, the evidence submitted alongside the neighbourhood plan indicates this not to be the case with IOWAs comprising private gardens excluded. The land adjacent to the Bull Tavern, the subject of the proposed allocation Policy 39 was also not included in the assessment.</p> <p>Paragraph 185 of the NPPF (2012), against which this neighbourhood plan is being examined, sets out, amongst other things, that once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Paragraph 30 of the NPPF (2018) makes the same point.</p> <p>NDDC therefore accepts that Policy 4 in the neighbourhood plan would take precedence over the relevant local plan policy, however this would only be in respect of those IOWAs that have been assessed by SNTC and identified as Local Green Space.</p>
	NDDC	<p>ii) How does NDDC wish me to view its representation regarding Policy 5? In this regard it does seem to me that there is too close an association in terms of its submission title that may confuse it with IOWA.</p>

Rep no	Respondent	Summary
		NDDC confirms that the Examiner was correct in his initial assumption that its representation reference 'PDF page 31, Plan page 24, Policy 5' was simply highlighting the need for a change to policy name to avoid confusion with the local plan designation title IOWA. In that representation, NDDC suggested that 'Sturminster Newton' could be added to the neighbourhood plan Policy 5 title. Bearing in mind, however, that, as outlined previously, the neighbourhood plan has not assessed all existing IOWAs at Sturminster Newton and as such neighbourhood plan Policy 4 'Local Green Space' does not take precedence in their respect, NDDC considers that a policy title 'Other Green Spaces' might be more appropriate for Policy 5.
	NDDC	<p>iii) Please will NDDC confirm that it has no objection to Policy 4?</p> <p>NDDC confirms that it has no objection to Policy 4. However it is of note that the land adjacent to the Bull Tavern has not been assessed in terms of LGS criteria.</p>
	NDDC	<p>iv) Saved Policy 1.9 states "Important Open or Wooded Areas - Designated Important Open or Wooded Areas will be protected from development." SNNP Policy 4 is titled Local Green Spaces (a policy title that carries a presumption similar to Green Belt). It is not titled as Saved Policy 1.9 and therefore can it over-ride that designation and remove an area from the grip of saved Policy 1.9?</p> <p>Please see NDDC's comments above in respect of (i). NDDC considers that Local Plan Saved Policy 1.9 remains part of the development plan until deleted or replaced as part of the Local Plan Review process. Consequently, Policy Saved Policy 1.9 would continue to apply to each of those IOWAs that have been designated as LGS by Policy 4 in the neighbourhood plan. In respect of the land designated by Policy 39, Policy 4 would not, in any event, take precedence over the IOWA designation because it has not been assessed under LGS criteria.</p>
	NDDC	<p>v) Have other Neighbourhood Plans in the District reviewed IOWAs, and if so by what designation?</p> <p>Yes. NDDC advises that other neighbourhood plans in North Dorset, including plans that have been 'made' (adopted), have considered whether IOWAs should be designated as Local Green Spaces. A number of IOWAs have been designated as Local Green Spaces in other neighbourhood plans.</p>
	NDDC	<p>vi) Please will NDDC clarify its attitude to the development covered by Policy 39 in the light of its development management officer's reported endorsement: <i>this document</i> (the 'Landscape and Visual Appraisal' that was commissioned (March 2017) and submitted at regulation 16 stage) <i>is a robust review of the IOWA designations and (she/he) found no reason to object to the conclusions in either document, (the Landscape and Visual Appraisal and the SNNP Local Green Space Policy) ?</i></p> <p>NDDC is aware of the landscape comments made by the Specialist Services Manager, referred to by Hall & Woodhouse Ltd, in respect of the current application (2/2017/1912/OUT) relating to the land adjacent to the Bull Tavern. However NDDC wishes to reiterate that the main harm resulting from development arising from the proposed allocation would be on heritage assets including the Sturminster Newton Conservation Area. NDDC's previous comments, in terms of its response to the submission version of the neighbourhood plan and its response to the Examiner's question EQ13, provide detail regarding its concerns, outlining the contribution that the land adjacent to the Bull Tavern as an open space contributes to the character of the conservation area. Historic England shares these concerns regarding the harm to heritage assets. The reasons for refusal, set out in a recent officer report for consideration by NDDC's Planning Committee, set out these concerns in terms of heritage assets.</p>

Rep no	Respondent	Summary
		<p>As a consequence of these concerns NDDC considers that Policy 39 in the plan fails to meet basic conditions relating to the production of a neighbourhood plan including: (i) the need for a plan to have regard to national policy and advice issued by the Secretary of State; and (ii) the need for the plan to be in general conformity with the strategic policies in the development plan for the local area.</p>
		<p>vii) Any Party to which this document is sent may also let me have any other relevant comment or analysis regarding the questions that I raise.</p> <p>NDDC notes that the Examiner's introductory paragraph 6 to EQ18 includes H&W's reference to the response received from Historic England (HE) at the pre-submission draft stage (Reg 14). NDDC considers that it is important that HE's comments are put into context. As indicated in paragraph 6, HE's comments related to the draft plan as a whole. However, as confirmed in the HE response to the submission plan, the need was also highlighted for the evaluation of potential allocation sites to demonstrate that appropriate account had been taken into account of the significance of, and potential for impact upon, relevant heritage assets.</p> <p>NDDC would like it to be noted that it is clear from the landscape comments made in respect of planning application 2/2017/1912/OUT that it had been assumed that the land adjacent to the Bull Tavern had been reviewed by SNTC as part of the assessment of potential sites for LGS designation, however as previously referred to this IOWA was not included.</p>
	Hall & Woodhouse	<p>Question i) Am I right in my understanding of Policy 4, about which I have no representations, that it supersedes IOWA in the SNNP area?</p> <p>Yes. Policy 4 sets out the Local Green Spaces which the Neighbourhood Plan seeks to protect and paragraph 4.2.13 sets out that they effectively replace the Important Open and Wooded Area policy areas that were carried forward from the previous Local Plan. This approach fully accords with Policies 4 and 15 of North Dorset Local Plan Part 1 (LP1) as referenced at 3.3 a) and b) of the Hall & Woodhouse Ltd representations dated 10 September 2018. Hall & Woodhouse Ltd supported Policy 4 of the NP in its representations in April 2018 (at the Pre-Submission Stage). It should again be confirmed that the land adjoining The Bull is not shown as a Local Green Space under Policy 4 and Map 3.</p>
	Hall & Woodhouse	<p>Question iv) Saved Policy 1.9 states "Important Open or Wooded Areas - Designated Important Open or Wooded Areas will be protected from development." SNNP Policy 4 is titled Local Green Spaces (a policy title that carries a presumption similar to Green Belt). It is not titled as Saved Policy 1.9 and therefore can it over-ride that designation and remove an area from the grip of saved Policy 1.9?</p> <p>It is firmly contended that SNNP Policy 4 on Local Green Spaces can and indeed should override and replace Policy 1.9 from the 2003 NDDC Local Plan. Paragraphs 7.132 through to 7.135 of the LP1 sets out the Council's approach to Local Green Spaces. The text notes that local green spaces can only be designated through local or Neighbourhood plans. Paragraph 7.135 specifically sets out that the review of IOWAs will be undertaken as part either of Local Plan Part 2 or Neighbourhood Plans. As already set out, the Neighbourhood Plan has undertaken this review and has set out its proposed Local Green Spaces at Policy 4. The land adjoining the Bull which was previously an IOWA is not included.</p>
	Hall & Woodhouse	<p>Question v) Have other Neighbourhood Plans in the District reviewed IOWAs, and if so by what designation?</p> <p>The Examiner is referred to the Shillingstone Neighbourhood Plan which was made on 9 February 2017 following a successful referendum. Policy 1 (page 8) is entitled Local green spaces. The preceding paragraphs on page 7 explain that as well as new</p>

Rep no	Respondent	Summary
		<p>designations, the NP reviewed the IOWAs as designated in the 2003 NDDC Local Plan. It further states: <i>“Once this neighbourhood plan is made, those areas within Shillingstone which are presently identified by the saved policies of the North Dorset Local Plan as Important Open and Wooded Areas but which are not included within the local green spaces will no longer be specially protected.”</i></p> <p>The Bourton Neighbourhood Plan was made in January 2018, after a successful referendum. It has also reviewed the IOWAs in its Neighbourhood Plan area as set out originally in the North Dorset Local Plan 2003. In the case of this Neighbourhood Plan it has decided to retain all of the allocations but to include them as Local Green Spaces (Policy 9).</p>