

Chickerell Town Neighbourhood Plan - Submission Plan – Summary of Representations

Chickerell Town Council submitted the Chickerell Town Neighbourhood Plan (2019–2036) to Dorset Council for independent examination in May 2020. People were given eight weeks from 21 August to 16 October 2020 to comment on the content of the plan or how it was produced. At the close of the public consultation 12 representations were received.

The following table is a summary of the representations received, as required by Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendums) Regulations 2012. Copies of the original, full representations as they were submitted to Dorset Council are available online from:

www.dorsetcouncil.gov.uk/chickerell-neighbourhood-plan

Rep ID	Respondent	Summary
CH01	Highways England	We are satisfied that the plan’s proposed policies in themselves are unlikely to result in development which will adversely impact on the SRN. It is noted that only one new housing allocation is being promoted within the neighbourhood plan, given the scale of existing Local Plan allocations within the Parish to address existing local housing need and the potential for further allocations to come forward as the new Dorset Council Local Plan emerges. Highways England looks forward to continuing to work with Dorset Council in developing the necessary transport evidence base to support the emerging Local Plan and the identification of any necessary infrastructure required to accommodate further growth. It is accepted by all parties that the A35 junctions, including the A35/A354 Stadium and Monkey Jump roundabouts, experience congestion particularly at peak times, and this has the potential to be further impacted by growth in and around Chickerell and Weymouth. It will therefore be important that any large scale development proposals coming forward which have the potential to impact on the operation of the A35 include a suitable assessment of traffic impact and mitigation measures, in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development.
CH02	Historic England	There are no issues associated with the Plan upon which we wish to comment.
CH03	Darren and Claire Taylor	The town is increasing rapidly in size and the local amenities for the children to be able to play and socialise is not currently sufficient. Please find the link below for the current petition which shows the interest of many residents of Chickerell for a much needed skatepark to be constructed in the town. (Petition end date currently stands at 30/09/2020 and the final tally will be forwarded to the relevant decision makers.) https://www.change.org/ChickerellTownSkatepark
CH04	Natural England	Policies CNP2 and CNP7 We support these policies which seek to protect the local green spaces.

		<p>Policy CNP3/Site allocation at Montevideo House</p> <p>Based on the information previously provided we advised (in June 2019) that a Habitats Regulations Assessment (HRA) of the plan is not required. Since that date further evidence has come to light which has led to the development, with your Authority, of an interim strategy for mitigation of impacts on Chesil and the Fleet. In light of the information regarding the site allocation it seems unlikely that it would increase residential occupation of the site, as any new dwellings would replace residential park homes. On that basis we continue to advise that an HRA of the plan is not required but the plan may like to refer to the emerging strategy.</p> <p>Policies CNP4 and CNP8</p> <p>We welcome these policies and in particular welcome recognition of the importance of the area as functionally linked habitat for the Crookhill Brick Pits SAC/SSSI.</p> <p>Policies CNP9, CNP10 and CNP12</p> <p>We support these policies in respect of the Heritage Coast, AONB and biodiversity enhancement.</p>
CH05a	Persimmon Homes South Coast	<p>Objection to Policy CNP4 owing to the potential affect the policy could have on the delivery of the allocated site of CHIC2 Land east of Chickerell in the adopted West Dorset and Weymouth Local Plan (2015). Policy CNP 4 of the CNP states that;</p> <p><i>"The undeveloped Chickerell Wildlife E-W Corridor (as shown on Map 5) forms an important network of multifunctional green space capable of delivering a wide range of environmental benefits. Development that would detract from this function will be resisted."</i></p> <p>It is noted that the Dorset Environmental Records Centre (DERC) data shown in the CNP at page 6 on Map 2 'Ecological Networks' identifies a small parcel of land to the north of the Chickerell Link Road with a 'Wildlife Corridor & Stepping Stone' annotation. Given the annotation is just a small parcel it cannot be a corridor and can only comprise a 'stepping stone'. However, paragraphs 4.23 - 4.25 of the CNP go on to describe '<i>an important wildlife corridor and open space between the Chickerell Link Road and Weymouth Football Stadium</i>'.</p> <p>Paragraph 4.26 states that;</p> <p><i>" The Local Plan's allocation east of Chickerell includes the requirement for the development to connect to the Chickerell Link Road, which will inevitably impact on this wildlife corridor. Great care will be needed in the design of this route in order to ensure that this new road does not create a significant barrier for many species."</i></p> <p>Map 5 'Map of Wildlife Corridors and sites' annotates a wildlife corridor running to the north of the Chickerell Link Road over land required to provide an access to the CHIC2 allocation in the adopted local plan.</p> <p>Paragraph 10.6.3 of the adopted West Dorset, Weymouth and Portland Local Plan (2015) states that;</p>

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		<p>"A new vehicular access onto the Chickerell Link Road will be required, linking through the development to School Hill and across to Floods Yard and onto Chickerell Hill. This will need to be able to accommodate a bus route and be phased with the development."</p> <p>The policies map for the adopted West Dorset, Weymouth and Portland Local Plan (2015) does not show the proposed CNP Wildlife Corridor as being an area protected for ecological or biodiversity purposes. Only the Bennetts Water Gardens are annotated as a Site of County/Local Importance for Nature Conservation in the vicinity of CHIC 2 to the north of the Chickerell Link Road.</p> <p>It is considered therefore that the CNP is not in general conformity with the strategic policies of the adopted Local Plan and therefore it fails to meet the Basic Conditions required in order to proceed to referendum as described in Planning Practice Guidance.</p> <p>Moreover a recent appeal decision (APP/D1265/W/20/3254642) dated 29th September 2020 with regard to land owned by Mr and Mrs Wiltshire found at paragraph 13 that failure to deliver the Link Road required by Policy CHIC2 'would unacceptably harm the delivery and environmental sustainability of the Chickerell Urban Extension.' The Inspector found therefore that weight should be given to ensuring the CHIC2 allocation could be delivered.</p> <p>Our clients have evidenced through the preparation of an Environmental Statement, to accompany the imminent submission of an outline planning application at the CHIC2 allocation, how biodiversity and ecological matters will be addressed and mitigated, however they particularly object to the negative wording of Policy CNP4 which seeks to 'resist' development that would detract from the function of 'Chickerell wildlife E-W corridor'.</p> <p>A new access into CHIC2 from the Chickerell Link Road sufficient to provide a bus route and walking and cycling corridor will require a land take that will sever the 'Chickerell wildlife E-W corridor' however this new road is required as part of the adopted Local Plan.</p> <p>It is considered therefore that the Chickerell Neighbourhood Plan should not contain a policy that could be used to 'resist' the delivery of the Chickerell Link Road and therefore the CHIC2 allocation.</p> <p>Our clients object to proposed Policy CNP4 in so far as it may unnecessarily delay the delivery of the vehicular access road to the site, the delivery of new market and affordable homes, public open space, including playing pitches and a skate park at an existing allocated site, when biodiversity considerations and mitigation will be thoroughly considered and addressed through an upcoming outline application at the CHIC2 site. Policy CNP4 should be amended to expressly state that the infrastructure, access road and public open space required to be delivered by Policy CHIC 2 of the adopted Local Plan are exempt from the provisions of the policy.</p>
CH05b	Persimmon Homes South	<p>Objection to Policy CNP10 owing to the potential affect the policy could have on the delivery of the allocated site of CHIC2 Land east of Chickerell in the adopted West Dorset and Weymouth Local Plan (2015).</p>

<p>Coast</p>	<p>Map 5. Map of Wildlife Corridors and sites illustrates the extent that land of Local Landscape Importance wraps around the allocated CHIC2 site.</p> <p>The CNP fails to illustrate the extent of the CHIC 2 allocation on any of its maps, therefore an excerpt from the adopted polices map of the West Dorset and Weymouth Local Plan (2015) is attached at Appendix 1 to provide the CNP Examiner with certainty over the area covered by the CHIC 2 allocation.</p> <p>It is clear that the CHIC2 allocation abuts land shown as of Local Landscape Importance in the CNP.</p> <p>Our client has been engaged since 2015 with both the local community and the Council in preapplication discussions concerning the form of development to be brought forward at CHIC2, including the community facilities to be provided which comprise a new two form entry primary school for Chickerell and playing pitches and a skate park to the south of the site.</p> <p>During early discussions with the Highway Authority it became apparent that in order to achieve the technical standards required by the highway authority with regard to the north access it would be necessary to locate the northern access into CHIC2 partly outside the allocated site, therefore a small part of the planning application submitted to the Council on 16th October 2020 falls outside the allocation and within land shown as of Local Landscape Importance by the CNP.</p> <p>Given that the Local Plan was adopted in 2015 and our client began detailed negotiations on the site with the Council in 2014/2015 the matters relating to the northern access, highway safety and the land required to safely deliver this were not precisely ascertained until after the formal adopted of the Local Plan.</p> <p>At no point in pre-application discussion with the Council was any concern raised about the proposed new access requiring land slightly beyond the allocated site owing to the highway safety matters involved.</p> <p>Moving the access slightly north also overcomes historic landownership issues and therefore helps to facilitate the delivery of the site.</p> <p>A recent appeal decision (APP/D1265/W/20/3254642) dated 29th September 2020 with regard to land owned by Mr and Mrs Wiltshire found at paragraph 13 that failure to deliver the Link Road required by Policy CHIC2 'would unacceptably harm the delivery and environmental sustainability of the Chickerell Urban Extension.' The Inspector found therefore that weight should be given to ensuring the CHIC2 allocation could be delivered.</p> <p>Our clients raise concern that emerging CNP Policy CNP10 could be interpreted by decision makers, once it begins to carry weight in the decision making process, as a reason to not accept or approve the northern access into the CHIC2 site as submitted, owing to the fact that a very small part of the application site falls within the Locally Valued Landscape north and east of Chickerell as defined by the CNP.</p> <p>Any obstruction to the delivery of the adopted CHIC2 allocation will undermine the five year housing land supply of the authority and the delivery of open market and affordable housing when the Government is committed to a target of delivering 300,000 new homes per annum.</p>
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		<p>The CNP should acknowledge the location of the adopted CHIC 2 strategic allocation and provide mapping to show the extent of the allocation to the north and east of the settlement.</p> <p>Policy CNP10 should acknowledge that development required to facilitate the delivery of the new Chickerell Link Road for the purpose of delivery strategic allocation CHIC2 where it may be located within the Locally Valued Landscape north and east of Chickerell to the north of CHIC2, should be looked upon favourably where it is required for the purposes of meeting highway safety technical standards required by the Highway Authority.</p>
CH05d	Persimmon Homes South Coast	<p>With regard to the site known as the 'Former Tented Camp' which is located to the south of Mandeville Road at Wyke Regis, within the Chickerell Neighbourhood Plan Area. Paragraph 7.4 of the CNP states that the former West Dorset Council had proposed limited development of the site in their 2018 Preferred Options consultation and that previously it had been considered as a traveller site.</p> <p>The CNP states at p. 21 that the site is "not actively being promoted through this Neighbourhood Plan (in the absence of any identified local need), in light of the adjacent warehouse site being developed for housing, it is accepted that the site is probably suitable for some limited residential development."</p> <p>Paragraph 7.4 of the CNP continues;</p> <p style="padding-left: 40px;">"If accepted through the Dorset Local Plan, the Town Council will ask that any development in this location should be limited to a single line of housing fronting the road between the existing properties and the Value House development. This would ensure the wildlife inhabiting the Fleet side of the site (e.g. wintering Short-eared Owls) are afforded some protection by restricting access, and that development does not impinge into the wildlife corridor linking through to Little Francis. As this site will be viewed from the South West Coast Path any development should be appropriate to that setting, for example, Fleet historic coast guard cottage style and not flat roofed square blocks."</p> <p>Our clients object to the CNP approach to this site which is not based in evidence and request that the site be allocated for residential development in the CNP for the following reasons;</p> <p><u>Housing Need</u></p> <ul style="list-style-type: none"> • The CNP states at paragraph 3.2 that it has been written to cover the period from April 2019 to March 2036. • The existing adopted Local Plan, the West Dorset, Weymouth and Portland Local Plan has a plan period until 2031. • The allocations in the adopted local plan were made to meet housing need until 2031 not 2036 – as currently written the CNP does not account for 5 years of local housing need. • The CNP should be written to be in general conformity with the strategic policies of the adopted local plan in order to meet the basic conditions test of the planning practice guidance. • The adopted West Dorset Weymouth and Portland Local Plan (2015) has a plan period until 2031, however in order

		<p>to not require immediate review after the adoption of the new emerging Dorset Local Plan which will cover the period until at least 20382, the CNP could allocate additional development sites to meet emerging local needs.</p> <ul style="list-style-type: none"> • The Government has recently consulted on changes to the Standard Method for calculating local housing need, and the Housing White Paper has consulted on the Government providing housing need figures directly to Council's having taken local constraints into consideration. • It is clear that the Government is ambitious with regard to its aspirations to deliver 300,000 new homes nationally per annum. • Initial calculations for Dorset Council based on the Governments consultation methodology for changes to the standard method indicate that the Council will need to provide over 285 dwellings per annum more than would be required by the current standard method in the NPPF (2019). • It is clear therefore that additional housing sites will be required across the authority moving forward, including within the CNP area. <p><u>Previously Developed Land</u></p> <ul style="list-style-type: none"> • The Tented Camp site comprises previously developed land meeting the definition in the glossary in the NPPF (2019); " Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape." • The National Planning Policy Framework NPPF (2019) is clear at Section 11 that planning policies should make the best use of land. Paragraph 118c) states that planning policies should; " give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land" • The former West Dorset, Weymouth and Portland Council consulted on the Tented Camp as a draft allocation in the 2018 Preferred Options consultation for approximately 30 new homes. • The Chickerell Background Paper for the Preferred Options consultation (August 2018) (attached at Appendix 1) states with regard to Wyke Regis that there is ; "Potential for small scale development adjacent to built up area. Impact on Heritage Coast needs to be given consideration." • Section 10.2 of the Chickerell background paper for the Preferred Options consultation (August 2018) identifies the site (CH3) as a preferred option for development stating that; " This development option is a brownfield site known as the former Tented Camp at Mandeville Road. The option came forward during the Issues and Options consultation. The site is in close proximity to the Chesil and the Fleet SSSI and Heritage Coast. However, redevelopment offers an opportunity to improve the character of the area leading to landscape benefits and an
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		<p>enhancement to the Heritage Coast designated area."</p> <ul style="list-style-type: none"> • Further analysis of the site is provided at paragraphs 10.16 – 10.19 of the background paper which states that the site would be suitable for approximately 30 new homes. A draft Policy CHIC5 was provided; Table 10.5 stated the mitigation measures the Council considered necessary and an indicative layout/concept plan was provided at paragraph 10.22. • It is quite clear therefore, that West Dorset, Weymouth and Portland Council considered the site suitable for development, not only to assist in meeting housing need, including affordable housing, but also in terms of securing enhancements to the special character of the Heritage Coast by providing informal public open space, footpath connectivity and biodiversity enhancements. • The site has also been promoted to Dorset Council and included in the 2020 SHELAA (Site ref: LA/CHIC/011) and considered suitable for development, acknowledging that redevelopment could offer an opportunity to improve the character of the area leading to landscape/environmental benefits and an enhancement to the designated Heritage Coast. Studies undertaken by Persimmon to support the promotion of the site consider that a greater number of new homes can be accommodated with appropriate mitigation and without resulting in adverse impacts on ecology and landscape. • Given the emerging draft allocation prior to local Government re-organisation in Dorset our clients have continued to undertake further detailed evidence base studies which in turn have informed the production of a comprehensive Site Deliverability Statement which is attached at Appendix 2. This document demonstrates that the site can deliver approximately 130 new homes while retaining substantial areas for open space and recreational purposes and a green gap for wildlife corridor connectivity across the northern and western part of the site. • Such a scheme will assist in meeting new housing need arising from changes to the Standard Method, including new affordable homes, it will bring environmental enhancements to this part of the heritage coast and will provide enhanced public open space provision in perpetuity for the existing community. • The site is suitable, available and deliverable and owing to its size and the fact that it does not require extensive new infrastructure to deliver, can also contribute to the Council's five year housing land supply. <p><u>Ecology</u></p> <ul style="list-style-type: none"> • The site specific Ecology report submitted with these representations does not identify Short Eared Owls as using the site, contrary to the findings and text of the CNP. • The site will not impinge on the Wyke Regis wildlife corridor adjoining the western boundary of the site as the site proposals include a large area of public open space adjacent to the wildlife corridor which could be used to expand or enhance the corridor. • It is considered that Policy CNP8 as currently written is not positively prepared. It is suggested that the wording should be amended to read "Development that would enhance....would be supported". <p><u>Design</u></p>
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- The Site Deliverability Statement provides the design rationale for our client's proposals for the site, including the fact that development has been concentrated to the eastern edge of the site in order to preserve the gap between any new built development and the Value House site to ensure green infrastructure connectivity is maintained for ecological purposes.
- The CNP provides no site specific evidence to demonstrate that a 'single line of housing fronting the road between the existing properties and the Value House development' is a better design solution for development at the Former Tented Camp site than that proposed by our client in their Site Deliverability Statement, which is supported by a site specific Landscape and Visual Impact Assessment and submitted with these representations.
- Our client considers that the reference in the CNP to any development at the site being "Fleet historic coast guard cottage style and not flat roofed square blocks" should be removed from the text of the CNP as any new development at the site would respond to its local context, including existing development to the north and east of the site.
- It is considered unreasonable of the CNP to be overly prescriptive with regard to the design of any potential new homes at the site.

Landscape

- The CNP provides no site specific evidence base to demonstrate that the site can only support 'limited development'.
- The NPPF supports development that is 'compatible' with the 'special character' of heritage coasts and the glossary of the adopted West Dorset Weymouth and Portland Local Plan (2015) defines heritage coast as; " A non-statutory designation defining areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors." (emphasis added)
- The adopted West Dorset Weymouth and Portland Local Plan (2015) does not state that residential development in the heritage coast is considered to be inappropriate.
- The West Dorset, Weymouth and Portland Strategic Landscape and Heritage Study Stage 2 Assessment: Chickerell (July 2018) identifies that the perceptual and experiential qualities of the area are 'degraded by the holiday park, barbed wire and structures associated with the military training camp, and views to the nearby development'.
- By delivering a scheme that is compatible with the heritage coast our client would not only enhance the perceptual and experiential qualities of the area but would also deliver enhanced connectivity to the heritage coast and the Wyke Regis Wildlife Corridor in perpetuity.

Conclusions

The CNP is unnecessarily restrictive with regard to its descriptions of the quantum and location of development that could come forward at the former Tented Camp site.

Our clients have demonstrated with site specific evidence submitted to the Regulation 16 consultation that that the site can deliver approximately 130 dwellings without impacting on the heritage coast or the Wyke Regis wildlife corridor. Accordingly,

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		<p>it is considered that the site should be allocated in the Neighbourhood Plan for up to 130 new homes.</p> <p>The position of the CNP with regard to the Former Tented Camp site is not based in site specific evidence nor is the plan 'positively prepared' in accordance with the NPPF (2019) with regard to any changes to housing need that may emerge through Government consultations and the preparation of the new Dorset Local Plan.</p> <p>The CNP fails to acknowledge that this is a substantial brownfield site with considerable development potential within the Neighbourhood Plan Area.</p> <p>The CNP proposes a plan period 5 years longer than the current adopted local plan without an associated significant increase in housing numbers to meet local need (the only housing allocation in the CNP proposing a small low density housing scheme under Policy CNP3 Land to the rear of Montevideo House).</p> <p>The Former Tented Camp off Mandeville Road, Wyke Regis should be allocated for residential development purposes for development by the CNP (the site was proposed as an allocation in the former West Dorset, Weymouth and Portland Council 2018 Preferred Options). Where site specific studies and evidence demonstrate that an increase in the development can be satisfactorily accommodated while providing the mitigation previously sought by the Council at the site; the CNP policy should allow for the site to deliver up to 130 new homes.</p>
<p>CH05 D</p>	<p>Persimmon Homes South Coast</p>	<p>The last two criteria points of the policy CNP11 as stated below are overly onerous. Unless they are evidenced and demonstrated by a Design and Access Statement to be necessary they should not be mandatory requirements of all new development within the Neighbourhood Plan Area.</p> <p>The last two criteria points of the policy state the following local priorities;</p> <ul style="list-style-type: none"> " -Emphasis on cottage-style properties within the housing mix, particularly within Chickerell Village and Charlestown, with clusters of cottages positioned around informal greens and drives - Using a mix of materials, including use of local stone as part of this mix" <p>Such a prescriptive requirement around design potentially stifles innovation and creativity and does not allow for the possible use of modern methods of construction or new materials.</p> <p>The NPPF (2019) and the National Design Guide (Oct 2019) both ensure that new development takes design cues from its proposed locality. This process is evidenced through the use of Design and Access Statements which are a mandatory requirement of the planning application validation process.</p> <p>It is also necessary that new development ensures the best use of land with public open space and parking standards being set by the local planning authority and implemented through the consideration and determination of planning applications.</p> <p>The proposed emphasis on cottage-style properties would not be the best use of land given that being generally single storey dwellings, they are land intensive. Cottage-style properties would, in general, only cater for smaller 1 and 2 bed properties</p>

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		<p>with all living accommodation on the ground floor which is not what most purchasers of modern housing aspire to. In addition, it is considered 'cottage-style' properties are not the overarching dwelling design within the NP area. Moreover the delivery of affordable housing requires a mix of housing to be provided in accordance with the requirements of the Council.</p> <p>The use of local stone could limit construction methods and would add cost to new developments which may adversely impact on viability and comprise delivery to the detriment of the local community, especially where this involved the delivery of new affordable housing.</p> <p>CNP11 also encourages designs that;" exceed the minimum building regulation standards for energy and water efficiency,". The national planning practice guidance¹ is clear that all new homes have to meet the mandatory national standard of 125l/person/day and that where there is clear local need local authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regs optional requirement of 110l/person/day, however part of establishing a clear need is the consideration of impact on viability.</p> <p>The CNP has not undertaken a viability appraisal to evidence that such development can be supported within the Chickerell Neighbourhood Plan area, these are matters that should not be addressed through the CNP but by Dorset Council through the emerging Local Plan review.</p> <p>Careful consideration should be given to the appropriateness of the two criteria points of Policy CNP11 listed above. These criteria should be amended to be less onerous to allow for creativity and innovation in new development.</p>
CH06	CG Fry (local housebuilder)	<p>It is welcomed that the wording of paragraph 1.1 has been altered from our area required protection of a Neighbourhood Plan to would benefit from having a Neighbourhood Plan.</p> <p>However, whilst this wording has been changed the Neighbourhood Plan still overly focuses on protection, without grasping the issues the area faces in terms of housing need, demand and requirements. Dorset Council faces finding a considerable amount of housing land to meet government requirements in terms of housing numbers. There is also a strong possibility that the Council's requirements could increase in the near future, as the government reviews its methodology for calculating those requirements.</p> <p>The Neighbourhood Plan presents an ideal opportunity to assist the Council in meeting its housing requirements by spreading development across the Council area in sustainable locations. Unfortunately there is no evidence in the Plan that meaningful liaison has taken place with the Council on how the Neighbourhood Plan could help achieve this within the Neighbourhood Plan area.</p> <p>Paragraph 1.10 of the Submission version still states that:</p> <p style="padding-left: 40px;">The 2006 and 2015 Local Plans allocated significant sites in Chickerell (in the 'Village') for over 1,100 new dwellings.....As such this strategic level of growth should more than meet any anticipated local need for housing development.</p>

This statement looks back and not forward. There is no evidence that the Neighbourhood Plan has investigated current needs, demands and requirements for the Neighbourhood Plan’s long plan period. A lot of up to date background evidence, particularly on housing need, should be available from Dorset Council, as it gets very close to going out to consultation on its Local Plan Review early in 2021. This evidence should be available in advance of when the Neighbourhood Plan is due for examination.

The land west of Southill was included as a Preferred Option in the draft West Dorset Local Plan in 2018. When that Plan was stopped in favour of preparation of the Dorset Local Plan, the site has continued to be promoted by CG Fry who now have an option on the land with the landowners.

In September, Dorset Council published its 2019 Strategic Housing Land Availability Assessment (SHLAA). This rated the suitability of the land west of Southill as follows:

Much of the site has potential for built development. However, the uppermost parts of the site are elevated and exposed. Residential development here would result in unacceptable landscape impacts though the land could contribute to open space provision. A suitable site subject to mitigation. (Our underlining)

This up to date information on the suitability of the site should be recognised by the Neighbourhood Plan, alongside additional information required on housing needs, demands and requirements.

Once this has been done the, Neighbourhood Plan’s current conclusions about the site would be seen to be flawed.

Paragraph 10.5 of the Submission Plan still states:

Although not actively being promoted through this Neighbourhood Plan in the absence of any local need, it is accepted this site could be developed subject to suitable landscaping. [Our underlining]

If the Neighbourhood Plan Group were to liaise with Dorset Council, it would become more apparent that there is local housing need and that this site would form valuable contribution to Dorset Council’s housing requirement.

If the Plan were to allocate the site, the Neighbourhood Plan could set out guidelines for how it would wish to see development proceed.

It is also noted that in paragraph 10.6 of the Submission Plan it is stated that:

Some 58% of responses to the Neighbourhood Plan questionnaire agreed the site to be suitable, [Our underlining] but given the significant sites already allocated in the near vicinity 88% of respondents thought this development should await completion of the majority of the existing allocated Chickerell sites.

Bearing in mind that the Neighbourhood Plan covers the period to 2036 and the West Dorset, Weymouth & Portland Local Plan 2015, which allocated the sites referred to above, only covered the period to 2031, this is not a justifiable reason not to consider this site in the Neighbourhood Plan.

One part of the Submission Plan that has significantly changed from the Pre-Submission version is Policy CNP 10. This appears to have been expanded to protect a larger area of landscape.

The original version covered The Landscape Ridge north of Chickerell including Coldharbour. The Submission Plan now covers the Locally Valued Landscape north and east of Chickerell Village. Map 5 is referred to in this Policy. This defines Land of Local Landscape Importance (LLLI).

The change to Map 5 and proposed designation of an LLLI is objected to. This designation covers the northern part of Land West of Southill and the golf course land to the west. The policy seeks to protect the area for the following qualities:

- Long views to the Dorset AONB to the north;
- Rural setting for Chickerell and Radipole villages and wider rural backdrop to north-west Weymouth;
- Green wedge between Chickerell and Southill/ Radipole; and
- Part of the north-south wildlife corridor from Radipole Lake SSSI.

Whilst some parts of this policy may be justified, that part which covers the northern part of the land West of Southill is considered to be excessive. Any development of this land should be required to be accompanied by a Landscape and Visual Assessment, which would help determine how far north any development could go. The landowners have already has such a document prepared which concurs that the upper part of the site would be best used for open space to protect views. This report does not require such a significant amount of land to be kept free as the Neighbourhood Plan requires however. Additionally, CG Fry are also having their own landscape assessment undertaken.

Equally the Plan’s reference to:

The green space of the Wessex golf centre forms an essential part of green gap when viewed from the south

is also considered to be excessive control, without proper justification. The justification given in the preceding text to the policy is not clear and convincing. It also fails to recognise that the existing Local Plan has defined development boundaries to settlements with development outside those boundaries strictly controlled. The proposed additional level of control to safeguard green gaps is neither justified nor warranted.

Our conclusion on the Submission Version of the Neighbourhood Plan is similar to that given for the Pre-Submission version:

As currently drafted, we conclude that the Neighbourhood Plan does not meet the Basic Conditions for Neighbourhood Plans in that it fails to properly take into account national planning policy in the form of the NPPF and NPG, particularly in respect of ensuring a proper supply of housing. In not doing so it fails to deliver sustainable development and is at odds with the direction of travel for strategic policies being formulated for the emerging Dorset Local Plan. Additionally, it also attempts to introduce landscape controls that are neither properly justified nor warranted.

<p>CH07</p>	<p>Bourne Leisure</p>	<p>1. Vision and Objectives (observation)</p> <p>In our February 2020 representations we highlighted the importance of Littlesea Holiday Park as an important employer in Chickerell and as such this should be recognised through references to the tourism sector in the Vision and Objectives.</p> <p>The Consultation Statement states:</p> <p><i>“The penultimate objective is “To support the local economy through its existing businesses, by encouraging new enterprises and facilities which enhance commercial effectiveness and employment opportunities”. The tourist industry is mentioned under the fourth bullet point (in reference to the importance of protecting the beauty of our coast).</i></p> <p><i>On this basis references to tourism are considered sufficient and it would not be appropriate to major on this sector as a key driver for the plan. Whilst the 2011 Census shows that the accommodation and food services accounts for about 14% of jobs in Weymouth and Portland, it is not such a major factor (accounting for about 6% of jobs) in the plan area.”</i></p> <p>There are three points to make:</p> <p>Firstly, the reference to the tourism industry with respect to the coast is not one that supports the tourism industry. The reference instead is one that highlights the importance of the coast to the sector. The coast is clearly important to the tourism sector. However, simple reference to the tourism sector by conflating the two points cannot replace reference to the importance of the tourism industry through support for further investment.</p> <p>Secondly, the Consultation States that the accommodation and food sector only accounts for about 6% of jobs in the Parish. We assume this figure has been taken from the 2011 census, which concludes that 6.4% of those resident in Chickerell Parish are employed in this category of jobs. This is different to how many jobs there are in Chickerell in this sector and the proportion of accommodation and food jobs as a proportion of total jobs available in the Parish.</p> <p>The best source of data on jobs in a local area is the Business Register and Employment Survey. It is not a complete record of employment levels but is the most reliable data set that we have. The most recent data is for 2018. This data set is provided for the Chickerell ward as the data not available at Parish level - although much of the area is the same. The data shows that, of the 5,000 jobs in the ward, 8% are in the accommodation and food sector and 2% in arts, entertainment and recreation – so 10% of employment in tourism and leisure related activities. At one in ten jobs, this is not insignificant.</p> <p>Thirdly, whilst the Consultation Statement dismisses the relationship between the Parish between Weymouth and Portland to Chickerell, it is undeniable, due to proximity and the reliance of jobs, services, and facilities for residents in the Parish.</p> <p>We note that the Consultation Statement says the references to tourism in the vision and objectives are sufficient but that has been based on a misunderstanding of the role of tourism, and specifically Littlesea Holiday Park, is to Chickerell, and to the wider area. That said, we welcome the indirect suggestion in the Consultation Statement that Littlesea Holiday Park would fall within the category of ‘existing businesses’ and as such the Neighbourhood Plan will encourage proposals that provide new enterprises and facilities which enhance commercial effectiveness and employment opportunities. The</p>
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remaining policies through the emerging Plan should be consistent with this position.

2. Paragraph 8.2 (objection)

Reflecting our representations earlier this year, Bourne Leisure welcomes the inclusion of a reference to the parking concerns around Lynch Lane and also welcomes the text stating,

“The parking provision for any future development proposals at the Estate, including both extensions and intensification of uses, should therefore be carefully scrutinised (rather than simply adhering to the generic standards) to ensure that this situation is not exacerbated, and support will be given to proposals that may remedy this situation (for example through the provision of additional parking or appropriate car park management and travel plan measures).”

However, Lichfields suggests that this would be given appropriate weight in the decision-making process if it was set out as a policy.

In addition to the new text, the emerging Neighbourhood Plan should include the following policy:

“Any development that gives rise to an increased demand in parking provision must clearly demonstrate that it will not rely on on-street car parking and it will not displace existing parking arrangements. Support will be given for additional parking provision.”

3. Paragraph 8.3 (support)

The emerging Neighbourhood Plan states,

*“8.3 Off Lynch Lane is the **Littlesea Caravan site**, within the Heritage Coast (the designation extends up to the edge of the Lynch Lane Estate). Based on the Local Plan policies, further caravan and camping in the Heritage Coast is unlikely to be supported.”*

Reflecting our representations earlier this year, we welcome agreement in the Consultation Statement that the previous text was inconsistent with the adopted Local Plan and that there may be opportunities to improve the visual impact of the site.

4. Policy CNP12 (object)

In our earlier representations, we raised concerns that the emerging Neighbourhood Plan was including a policy requirement that was 1) covered by the Council’s validation requirements and 2) would not be proportionate to the development proposed. The Consultation Statement responds,

“The policy is considered proportionate (for example it would not be triggered on previously developed sites unless there were features of obvious interest) and is supported by Natural England. The Council’s validation requirements are not policy.”

Bourne Leisure recognises the wider policy and legislative context for net biodiversity gain and its importance. We suggest that given that context, the Council’s validation requirements are sufficient. The introduction of further requirements is

unnecessary. However, if the Examiner disagrees and considers the general requirement in emerging Policy CNP 12 acceptable, we note that the extract from the Consultation Statement is incorrect. It says that the policy is proportionate as for example it is not triggered on previously developed sites unless there were features of obvious interest but draft CNP 12 states that the Policy requirements are triggered for developments on a brownfield site in excess of 0.1ha.

In the context of the Council’s validation requirements and wider legislative changes, the majority of the emerging policy should be removed as follows:

Policy CNP 12. Enhancing Biodiversity

~~Development should protect and, wherever practicable, enhance biodiversity, through an understanding of the wildlife interest that may be affected by development, and the inclusion of measures that will secure an overall biodiversity gain. To demonstrate this is achieved, a certified Biodiversity Plan as required by the Dorset Biodiversity Appraisal Protocol where a development would involve any of the following:~~

- ~~– the development of a greenfield site~~
- ~~– the development of a brownfield site in excess of 0.1ha;~~
- ~~– the loss of a hedgerow (in whole or part) or the loss of a mature native tree specimen;~~
- ~~– the loss of a dry stone wall (in whole or part);~~
- ~~– works involving a rural barn (including barn conversions) or other building (rural or urban) where barn owls or bats are known, or are suspected to be present;~~
- ~~– works within 50 metres of a pond or watercourse; or~~
- ~~– works within 50 metres of the existing ecological network (as shown on Map 2) or within a wildlife corridor (as identified on maps 5 and 7)~~

~~Where developments do not trigger the need for a Biodiversity Plan, as required by the Dorset Biodiversity Appraisal Protocol, ecological enhancements, such as bat, bird or bee boxes, and native planting schemes, should be incorporated into the development if at all feasible. Site plans should clearly show the provision of any wildlife corridors and biodiversity features that are to be retained or provided as part of the layout and design of the development.~~

5. Policy CNP9 (object)

Policy CNP9 states,

“Policy CNP 9. The Fleet and Heritage Coast

Development within the Heritage Coast to the south side of the Coast Road in Chickerell will be strictly controlled in recognition of the need to protect the landscape character and enjoyment of the Heritage Coast, including views across the

area from the Coast Road (where it adjoins the Heritage Coast) and views from the South West Coast Path, and to avoid disturbance to protected species on the Fleet.

All development proposals should protect, and where appropriate enhance, the biodiversity of the countryside, the Heritage Coast and The Fleet.”

In its consultation response, Dorset Council highlights that there is insufficient evidence to justify the approach taken to development in the Heritage Coast in this policy. The Consultation Statement dismisses this response by the Council. However, the comment is consistent with our previous representations that state that development should be considered on a case by case basis, particularly where there are opportunities to provide overall benefits.

We note paragraph 9.2 which states that “there are caravan and camping sites along the Heritage Coast which benefit from existing approvals. Arguably their existence has had an adverse impact on the wildlife and tranquil coastal landscapes”. This is simply an assertion which has not been justified through evidence nor has there been any understanding of the establishment of the caravan sites in the context of the Heritage Coast designation. Statements such as this are unhelpful particularly when the caravan sites, such as Littlesea Holiday Park, have a wider role in the local economy. This also appears to be at odds with the approach now taken at Paragraph 8.3 which recognises there cannot be a blanket restriction on all development within the Heritage Coast.

Bourne Leisure recognises the importance of the Heritage Coast and its designations. There is a careful balance needed and there may be strategic opportunities through the review of the Local Plan to adopt measures to enhance the Heritage Coast. In the meantime, in order to meet the basic conditions for a neighbourhood plan as set out in the legislation, the emerging policy should be amended to be in general conformity with Policy ENV1 of the adopted Local Plan,

“Development which would harm the character, special qualities or natural beauty of the Dorset Area of Outstanding Beauty or Heritage Coast, including their characteristic landscape quality and diversity, uninterrupted panoramic views, individual landmarks, and sense of tranquillity and remoteness, will not be permitted.”

The emerging policy should also be amended to reflect the requirements throughout the NPPF to prepare plans in a positive way, which includes the need for plans to be set out with a positive strategy for the conservation and enjoyment of the historic environment (Para 185). Paragraph 192 of the NPPF states,

“In determining applications, local planning authorities should take account of:

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

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		<p>The policies that underpin the decision-making process must be consistent with the requirements for decision-making. The emerging policy falls foul of having regard to national policy. Planning Practice Guidance explains that having regard means that a neighbourhood plan must not constrain the delivery of important national objectives (Paragraph 69, ID:41-069-20140306). The approach taken in the emerging policy therefore does not meet one of the basic conditions set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act.</p> <p>The emerging policy should be amended as follows:</p> <p>“Development within the Heritage Coast to the south side of the Coast Road in Chickerell will be strictly controlled carefully assessed in recognition of the need to protect the landscape character and enjoyment of the Heritage Coast, including views across the area from the Coast Road and views from the South West Coast Path, and to avoid disturbance to protected species on the Fleet. <u>Where significant adverse impacts cannot be avoided, mitigation or compensation measures will be considered in the determination of applications in this area.</u>”</p>
CH08	Aileen Chittle	<p>Having read through the Neighbourhood plan I can find no reference for more land put aside for allotments. As Chickerell will be expanding its population and more than likely the gardens to the new build houses will be small, I feel that there will be a need for allotments. Many of the houses within Chickerell (especially the new builds) have gardens that are too small to cultivate and provide leisure space for children. and adults all at the same time. Due to Covid 19 it has become apparent that people need outside space with their homes more than ever.</p>
CH09	Weymouth and Portland Access Group	<p>The Group is particularly supportive of the policies which support the retention of local open spaces, wildlife corridors, landscape protection, and enhancing biodiversity. The Access Group works to support the interests of people with disabilities, and others who find their accessibility to goods, services and the environment generally, across Weymouth, Portland and Chickerell. The definition of disability covers people who are have mobility or sensory impairment, are affected by mental health impacts, have learning difficulties, or are suffering from long term illness or injury. It is known that ready access to open space and the natural environment is important to all but it is often of particular value to people with disabilities and to those caring for young or elderly people. It is important for good mental health, as has been additionally demonstrated during the 2020 Coronavirus Pandemic. The Group also supports those policies which seek to maintain the Local Retail Centre and Community Facilities but would wish to see opportunities taken to improve accessibility as some locations and buildings fall short of the accessibility standards that are desirable. With regard to General Design Principles the Access Group continues to press for improvements to planning legislation and building regulations facilities to achieve more homes which are easily accessible for people with disabilities. Also important is that people with disabilities can readily visit the homes of family and friends. Whilst we recognise that legislative change is needed we would encourage local planning authorities and town and parish councils to use their influence to secure the building of more easily accessible homes. This objective should not conflict with the objectives of the Neighbourhood Plan policy as set out.</p>

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CH10	Michael and Wendy Kelly	Particularly support the policies to safeguard local areas of open space, wildlife corridors, Policy CNP9 in respect of The Fleet and Heritage Coast, CNP10 Locally valued landscape to the north and east of Chickerell, and CNP12 Enhancing Biodiversity. In 9.3 it would appear that a reference to the B3167 should refer to the B3157 road.
CH11	Jurassic Coast Trust	<p>Policy CNP9 (observation)</p> <p>Whilst we would look to support the provisions within this policy, we note the distinct lack of any reference to the Dorset and East Devon Coast World Heritage Site, otherwise known as the Jurassic Coast. The World Heritage Site covers 95 miles of coastline and incorporates the entire area from the top of the Fleet shore cliffs, across the Fleet itself and on down to the mean low water mark on the seaward side of Chesil Beach. The designation is based on internationally important geological, palaeontological and geomorphological features that are considered to be of Outstanding Universal Value. Within the National Planning Policy Framework World Heritage Sites are considered as Designated Heritage Assets and are provided the highest level of protection. World Heritage Sites also function as an international designation and represent the commitment of the UK government to the protection of the World's Heritage through the World Heritage Convention. The Jurassic Coast is described as a natural world heritage site, as its features of interest are based in the natural world, rather than being human-made / culturally derived. The protection and conservation of World Heritage Sites involves the preservation of the features of interest within the Site boundary and also the Site's setting i.e. the surrounding area. For further information please refer to the Jurassic Coast Partnership Plan 2020-2025, available online at www.jurassiccoast.org We recommend that the Chickerell Neighbourhood Plan be amended to include information about the World Heritage Site and its conservation needs in all relevant sections, but most especially in policy CNP 9. We also recommend that wider geological interests around Chickerell be reviewed, especially the Local Geological Site of Crook Hill Brick Pit and the use of local stone in preferred building design / landscape character. For more information on Local Geological Sites refer to dorsetrigrs.org</p>
CH12	Dorset Council	<p>General</p> <ul style="list-style-type: none"> • In terms of style, the submitted neighbourhood plan includes a number of sections that discuss locally specific planning issues, and even potential solutions to those issues, but do not directly link to any of the proposed policies. While for the planning authority it is relatively easy to distinguish policy from supporting text, lay readers may be confused by this approach. • In this respect, we wish to draw attention to paragraph 4 of the NPPG on Neighbourhood Planning. This states: “Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan.” • As such, we suggest that these ‘wider community aspirations’ which go beyond the supporting text of the proposed policies should either be deleted or separated out and presented in a companion document or annex.

Para 1.13

- We commented on the Reg 14 consultation that we felt the first sentence of this paragraph was not quite correct. We suggested it should be amended to: “When the Chickerell neighbourhood Plan is made, planning applications approved after this date will contribute 25% of the CIL (Community Infrastructure Levy) money received to Chickerell Town Council (with the exception of self build approvals).” We wish to reiterate this point.

Para 2.5

- The first sentence could be a bit more specific and say that the AONB crosses the parish boundary in two small areas.
- To help the reader, it might be useful to add something along the lines of “as shown on Map 1” as this map clearly shows the AONB in relation to the parish.

Map 3

- This map shows the spatial extent of several proposed neighbourhood plan policies. It also shows some designations (such as LNR, SSSI, AONB, Heritage Coast, Listed building) which come from external sources. It would be useful to the reader if the key to this map could state which policy each designation relates to, and this would help to distinguish which designations are new and which are existing designations. Likewise, it would be helpful if all subsequent policy maps could clearly indicate which policies they relate to.
- Crookhill Brickpits is also a Special Area of Conservation (SAC) as well as LNR and SSSI. SAC is the highest tier in the hierarchy of wildlife sites and therefore affords the site considerable protection. For clarity we suggest this designation is shown on the key.
- While this map (and others in the Plan) include Listed Buildings (and other constraints such as Heritage Coast and AONB), it does not include the Chickerell Conservation Area. While this isn’t a requirement, we feel it is an omission. Most neighbourhood plans include conservation areas on their policy maps as it is an important heritage asset. In our opinion it would help users of the document understand where this constraint lies.

Para 4.2, p. 10

- We believe there are 8 listed buildings/structures within the CA, rather than 7 – as shown on Dorset Explorer: <https://explorer.geowessex.com/?layers=4205,2787,51&basemap=26&x=364628.65&y=80688.31&epsg=27700&zoo m=16>
- The text here mentions 22 ‘unlisted buildings of character and group value’ identified in the CA Appraisal. Unfortunately, the draft NP appears not to propose any policy protection for non-designated heritage assets in the plan area, nor does it attempt to identify any additional non-designated heritage assets outside of the conservation area. We feel this is a missed opportunity which could be addressed as part of a future neighbourhood plan review.

		<p>Map 4</p> <ul style="list-style-type: none"> • While this appears to be a close-up of part of Map 3 (albeit with a different OS base map), it would help if a key was included. <p>Policy CNP1</p> <ul style="list-style-type: none"> • While our Reg 14 comments recommended that the policy should reference A class uses, the Government has since removed this group of uses from the Use Classes Order. Instead the new E Class has been introduced, which includes the former A1, A2, A3 and B1 classes, along with clinics, health centres, crèches and day nurseries from D1, and indoor sports and recreation facilities from D2. We therefore suggest amending the first sentence of the policy as follows: “Within the defined local retail centre in East Street (as identified on Map 4), retail and other E class or similar sui generis uses appropriate to a local centre will be supported.” • Similarly para 4.6 should be amended with regard to reference of A class uses. • The second part of the policy doesn’t appear to read correctly. The following amendments might help: “Development proposals to improve the provision of community facilities (including those listed below and shown on Map 3) will be supported, and every effort should be made to work with the local community and relevant authorities to investigate potential solutions to avoid <u>the any loss of any of the following facilities:</u>” • While we appreciate that the named facilities are shown on Map 3, we think it would help if the policy and the map could use identification numbers (or names) in order to allow the user of the document to clearly cross-refer between the two. • During Reg 14 we raised concern that Policy CNP1 overlapped adopted Local Plan allocations, and this could result in policy contradictions, particularly as far as the primary school site was concerned. For reference, LP Policy CHIC3 states: “The existing primary school site off Rashley Road in Chickerell ... may be developed for housing, provided that a replacement school, including school playing fields, sufficient to serve Chickerell has been secured as part of the Chickerell Urban Extension.” However, we (Dorset Council as the education authority for the neighbourhood plan area) have expressed a desire to retain the existing Chickerell Primary School site, and that the new primary school planned for at the Chickerell Urban Extension will be in addition to the current one. For this reason we do not intend to carry forward Policy CHIC3 into the forthcoming Dorset Local Plan and are content for the existing primary school site to be covered by proposed Policy CNP1. <p>Policy CNP2</p> <ul style="list-style-type: none"> • As with the previous policy and Map 3, it would be helpful for the reader if a system of identification names or numbers could be used. It would be sensible to use the same reference codes that were used in the supporting LGS assessment (May 2020).
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- We note that there appear to be three small areas of LGS marked on Map 3 which are not listed in Policy CNP2. These appear to relate to the grassed areas at Fishermans Close, Marshallsay Road, and May Terrace Gardens, and are described in para 4.9. It is not clear what their status is meant to be. As they do not appear to be covered by any NP policies, we suggest that they should be removed from any maps in the plan in order to avoid confusion.

Policy CNP3 ‘Land to the rear of Montevideo House’

- This policy allocates the existing caravan park, known as Montevideo Park, for housing. The stated reason for this is not to meet local needs or provide additional housing but to “improve the character of the local area” (paras 4.18, 4.19 and 4.22).
- The examiner should be aware that the site first got permission as a caravan / park home site in 1966, and a number of amended schemes have been approved since then. A decision on the most recent application (ref WD/D/19/001358) was issued on 22 Sept 2020, which granted permission to extend the site further eastwards in order to accommodate a further 10 park homes.
- It should be noted that the park homes on the site are considered permanent dwellings rather than temporary or holiday accommodation. This is an important fact to note as this allocation is unlikely to yield a net gain in dwellings; in fact, it could yield a net loss if there are fewer houses built than park homes removed (a point we raised at Reg 14).
- For reference, details of the most recent application, including the committee report that summarises the main points relating to this site can be found at https://planning.dorset.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=DCAPR_138599
- Knowledge of this latest application is required to understand why paragraph 4.19 specifies that the site allocation is limited to “the area on which caravans have been lawfully sited (as at January 2020), and does not include the undeveloped grounds to the rear.” The consequence of this is that the recently extended area of the caravan park falls within the proposed Wildlife Corridor (Policy CNP4).
- Chickerell Town Council put in an objection to this latest application, partly on the grounds that it falls outside the defined development boundary (as does the whole of the existing site). However, it has now been approved and this fact should be reflected in the supporting text to the neighbourhood plan. Ignoring the approval could lead to perverse outcomes and not result in achieving the overriding objective of this policy which is to improve the character of the local area.
- In addition to the above, the following comments are made by a Senior Conservation Officer at Dorset Council:
 - This is the only site allocation in the NP and the text refers to some comments ‘from the Conservation Team’ reflecting the possibility for development here. This might be the case, but the text could benefit from

		<p>greater clarification and perhaps some addition. The text states that ‘the residential park homes...are detrimental to its setting and affect its aesthetic value’ (4.20, p. 15), but it is not clear that it is understood exactly how the setting contributes to the significance of the Listed Building. Without this, it is then not possible to establish how replacing these with ‘low density housing’ would either improve the setting, or result in less harm than is caused by the smaller, less intrusive park homes. The text should make it clear that the significance is understood and the policy worded accordingly to reflect arising constraints/opportunities.</p> <ul style="list-style-type: none"> ○ The addition would be to make provision for the repair and retention of the barn and stable buildings, which are currently in poor order and only partly occupied. These certainly do contribute to the significance of the building and are likely to be considered curtilage-listed buildings. It is unlikely that any proposals that sought to demolish them would be considered favourably. ● Comments from an engineer in the Highways Safety team:- <ul style="list-style-type: none"> ○ Suitable vehicular and pedestrian access arrangements would need to be secured onto Chickerell Road. Given the carriageway and footway in the vicinity of the site sufficient vehicular visibility is likely achievable. The internal highway layout should be built to an adoptable standard. <p>Policy CNP4</p> <ul style="list-style-type: none"> ● As noted in para 4.26, the allocation east of Chickerell (adopted LP Policy CHIC2) includes a requirement for the development to connect to the Chickerell Link Road (B3157). This would involve a link road going directly across the proposed Wildlife Corridor. ● In addition, the proposed amended policy CHIC2 as set out in the Local Plan Review Preferred Options Consultation (August 2018) includes a requirement for: “a skate park, senior football pitch, and changing pavilion on land south of Green Lane.” This would also be on land included in the proposed Wildlife Corridor. ● Our concern lies in whether the proposed Wildlife Corridor could render this allocation undevelopable. As the allocation would deliver c. 490 dwellings on the area to the east of Chickerell, we consider it a large-scale allocation. Therefore our concern is that this policy could put the delivery of this allocation at risk. If this is the case then there is an issue of the proposed Neighbourhood Plan not being in general conformity with the strategic policies in the Local Plan, and therefore not meeting one of the basic conditions. We suggest that more detail is provided either in the supporting text or the policy to explain how this potential conflict can be overcome. ● As noted above (Policy CNP3) an application for a further 10 park homes has recently been granted on land to the east of Montevideo Park. This falls within the proposed Wildlife Corridor. We suggest that this area is removed from the proposed Wildlife Corridor. <p>Policy CNP5</p>
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- As with Policy CNP1, since the Reg 14 consultation the Government has removed the A class group of uses from the Use Classes Order. We therefore suggest amending the first sentence of the policy as follows: “Within the defined local retail centre in Charlestown (as identified on Map 6), retail and other E class or similar sui generis uses appropriate to a local centre will be supported.”
- The second part of the policy doesn’t appear to read correctly. The following amendments might help: “Development proposals to improve the provision of community facilities (including those listed below and shown on Map 6) will be supported, and every effort should be made to work with the local community and relevant authorities to investigate potential solutions to avoid the any loss of any of the following facilities:”
- While we appreciate that the named facilities are shown on Map 6, we think it would help if the policy and the map could use identification numbers (or names) in order to allow the user of the document to clearly cross-refer between the two.

Policy CNP6

- On page 24 there appears to be three different names given to Budmouth College (Budmouth School, Budmouth Academy and Budmouth College). While the institution might be referred to by all three names (and possibly others) it might help readability if there was less variation in naming this site.
- While Policy CNP6 reserves a specific parcel of land for school expansion (as identified in Map 6), paragraph 6.5 states: “Any undeveloped land adjoining the School should be reserved for such a purpose....” It appears that the supporting text does not correspond with the policy. We suggest that the supporting text is amended in order to align with the intentions of the policy.

Policy CNP7

- As with our comments to Policy CNP2, it would be helpful for the reader if a system of identification names or numbers could be used in Policy CNP7 and Map 6. It would be sensible to use the same reference codes that were used in the supporting LGS assessment (May 2020).
- We note that the proposed Cobham Drive LGS appears to comprise of five separate sections. As there is no obvious connection between these sections apart from the fact that they are part of the same housing estate, there is an argument to say that they should be assessed separately. For example, the small section adjacent to Stainforth Close has signs saying “No Ball Games” which presumably means it has a lower recreational value than other sections without this restriction.

Para 9.2

- Appears to be a small typo at the end of the second sentence – perhaps amend to “...increasing pressure on the

		<p>Heritage Coast’s wildlife and views.”</p> <p>Policy CNP9</p> <ul style="list-style-type: none">• It would be helpful if the policy could indicate which map(s) show the areas where this policy applies. <p>Policy CNP10</p> <ul style="list-style-type: none">• We note that the proposed Land of Local Landscape Importance (LLLI) designation overlaps to a small extent with CHIC2 and CHIC4. However, masterplans for these two areas illustrate that the areas that are overlapped are likely to be open space / green infrastructure, and therefore should be compatible with the proposed designation.• We wish to echo the concern expressed by Persimmon Hones that the proposed LLLI includes a small area of land to the north of CHIC2, east of School Hill, which is required for the delivery of CHIC2. Persimmon have been working with Dorset Council (and its predecessors) since 2015 to produce a suitable masterplan for the area. Early on it was agreed that in order for safe access to School Hill to be achieved, additional land to the north of ‘The Stables’ was required. We understand Persimmon have today (16 October 2020) submitted an outline planning application for this site. As with our comments with regards to Policy CNP4, we have concern over any policy that could risk the delivery of this large-scale allocation. We suggest that the extent of the proposed LLLI is reduced slightly to allow for the Persimmon scheme to make a safe link to School Hill.
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