

Milton Abbas Neighbourhood Plan - Submission Plan –Summary of Representations

Milton Abbas Parish Council submitted the Milton Abbas Neighbourhood Plan (2019–2031) to Dorset Council for independent examination in December 2019. People were given six weeks from Friday 31 January to Friday 13 March 2020 to comment on the content of the plan or how it was produced. At the close of the public consultation 13 representations were received. Two further representations (MA14 and MA15) were received during the following week and were accepted.

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/milton-abbas-neighbourhood-plan

Rep ID	Respondent	Summary
MA01	Highways England	We are satisfied that the plan’s proposed policies are unlikely to result in development which would adversely affect the SRN and therefore we have no comments to make. However, this does not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.
MA02	Wessex Water	Wessex Water has existing apparatus passing through the proposed Local Green Spaces. The Policy (MA7) prohibits development taking place “which would harm the enjoyment of these spaces or would undermine their importance”. This policy must not constrain maintenance or improvement programmes, which are critical for the efficient and safe operation of Wessex Water services.
MA03	Chris Skinner	<p>The plan submitted reflects a realistic and balanced approach to housing development in Milton Abbas. It also very clearly reflects the consensus views from the various stages of consultation.</p> <p>It is eminently sensible that the bulk of new housing development should be on the land owned by the Parish Council that sits between Damer Close and the GP surgery. This land has no current use and is in danger of simply degenerating into scrubland and a sympathetic housing development would be much better use for it and was provided for when Damer Close was constructed.</p> <p>There are significant disadvantages to all of the other larger sites put forward with the vast majority having a detrimental visual impact and / or contributing to village ‘sprawl’.</p>
MA04	Historic England	In our response to the Regulation 14 consultation we highlighted to the community the desirability of securing in writing confirmation from the Council’s heritage team of the suitability of the heritage evidence base to support the proposals and policies in the Plan, particularly as far as site allocations are concerned. This could then form part of

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		<p>the formal evidence base.</p> <p>Having looked on the Council’s website at the suite of documents submitted with the Plan we can find no indication of the written confirmation we recommended. The Consultation Statement refers to our Regulation 14 response and states that “<i>Dorset Council have been consulted and have not raised any heritage-related issues in terms of the site allocations</i>”. However, it is not clear from this whether it is a reference to previous consultation with your authority, its own Regulation 14 response, or an exercise carried out subsequent to our response.</p> <p>The absence of access to or lack of availability of your authority’s Regulation 14 response makes it difficult for us to clarify the situation for ourselves. But in any case, an absence of comment on heritage-related issues is not the same as a positive or demonstrable confirmation that none exist, nor as worded in the Consultation Statement, confirmation that your authority’s heritage team has been involved.</p> <p>We would therefore reiterate our previous advice that your authority provide or make more explicit written confirmation that its heritage service is happy with the site allocations from a heritage perspective so that it can form part of the evidence base.</p>
MA05	Jacqui Cooper	<p>I support the Plan as it makes sense to use the Parish Council land for small development, it has a low impact on the area. The village cannot support a huge development.</p>
MA06	Jim Boylan	<p>The Neighbourhood Plan has been put together by the people of the neighbourhood with relevant external professional advice.</p>
MA07	Robert Kelso	<p>This excellent comprehensive piece of work in my view represents the views of nearly all villagers to whom I have spoken.</p> <p>The NDP team should be congratulated for their hard work and professionalism. It is important that we rally as many people as possible to vote if/when we get to the referendum stage.</p>
MA08	Gerald Dale	<p>Based on the recommendations following the Referendum of Village residents and the various stages of consultation on the Draft NDP the proposed Sites meet the overall parameters required for housing developments in Milton Abbas. The Sites are within or immediately adjacent to existing residential housing and the services infrastructure required is conveniently placed for the development.</p> <p>The NDP as submitted has my support.</p> <p>However, in my opinion Site 7 in The Plan is better suited and would be a single Site to meet all the housing requirements. This Site would affect the least number of residents especially during the construction phase with movement of heavy plant and equipment, has the advantage of direct vehicle access from/to the main through road thus avoiding increase in traffic movements on the already heavily congested side roads to the proposed Sites. This</p>

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		Site would be screened from the road by existing hedgerows. Views across the countryside would be compromised if the NDP proposed Sites are developed.
MA09	James Farnham	The Milton Abbas NDP has been published following very wide consultation throughout the parish over several years. Additionally, a rigorous, evidence-based approach has been made in constructing the plan with very thorough adherence to due process throughout.
MA10	Chris Burdett-Clark	<p>There is a grave inaccuracy to this document, and to the previous document used at the time of consultation. "Important Views"</p> <p>I refer to the important views assessment document where View Points have been taken from Private land has been used to secure vantage points as being of import when as in the case of View 4 it has been inaccurately listed as having been taken from a "Restricted Byway" near to St Catherine's House when in fact this land is owned by my Wife and remains to this day a "Permissive Footpath" It clearly does not fall under the definition as set out in the section Methodology7, as it is neither a public highway, public footpath or bridleway.</p> <p>During the period of consultation, I had repeatedly attempted to ask that the NDP committee do acknowledge this inaccuracy but they have refused my requests and ignored their inaccuracies.</p> <p>Further more our own piece of land put forward to participate in the requests to find suitable building land has been eliminated from the list because of its categorized</p> <p>Following a CALL FOR POTENTIAL land sites suitable for development, October 2018, we nominated our own poor-quality grazing land, which later became referenced as" site 12" in what was the Milton Abbas Neighbourhood Development Plan 2019-2031", "Consultation Plan" as printed in July 2019</p> <p>In the report all sites were independently assessed for their suitability by national expert consultants AECOM. Strict. The report states,</p> <p>Site 12" Potentially", (Potentially suitable for development) "Providing the existing constraints can be overcome, the eastern section of the site is considered potentially suitable due to its proximity to the road network, and to residential properties within the settlement."</p> <p>In addition to this a Further Ecological Assessment of the sites was conducted by Bryan Edwards, of the Dorset Environmental Records Centre. (March 2019)</p> <p>Mr. Edwards report can be seen online, but he identified Site 12 as a large field located to the north west of the village, of "Grassland is best described as semi-improved and species poor.</p> <p>In summary he concluded that there were,</p>

		<p>No Bats</p> <p>No Badger</p> <p>No Hedgehogs</p> <p>No Dormouse</p> <p>No Great Crested Newt</p> <p>No Otter or Water Vole.</p> <p>So, there was no reason in his opinion, from an ecologist viewpoint that the site was unsuitable.</p> <p>In May/ June 2019 the committee consulted the local community again this time on a number of potential views from public vantage points that had been initially identified by the Steering Group, in an attempt to establish whether these views were valued and if any other views should be added to this list. They published their results. Important Views Assessment.</p> <p>This document details in its findings view no: 6 and view no: 5 both looking across site 12 from different vantage points.</p> <p>View no: 5 detailed as,</p> <p>E380438.51, N102041.00 “From the track near St. Catherine's House looking south across fields”</p> <p>This specific Track is Privately owned, by my wife, and is a permissive Footpath Only! It is not a restricted byway, as claimed in the final submitted document of the NDP.</p> <p>This remains a Private View Not a Public View. There is no Public right of way on this land or from this location.</p> <p>View no: 6 Looking out across the Amber "Possible" section of site 12, detailed as,</p> <p>E381049.62, N102174.99 “Looking west from the path to Jane's Wood across pasture.....</p> <p>This is again Privately owned land belonging to my wife, so this remains a Private View and not a Public View. There is no Public Right of Way from this point over this property. This location is not visible from either view No 5 or from any public highway, byway, public route or public space. It remains only visible from the properties backing onto the site including our own home in Athelstan Way, A total of just four properties!</p> <p>In the explanation notes of the Important Views Assessment document, it states under section Methodology, P2 section 7, “Criteria used for defining important Public view.”</p> <p>"The Steering Group ensured that the views were public rather than private and visible either from the public</p>
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		<p>highway, public footpath, bridleways, public open spaces....."</p> <p>This was in my opinion a wholly inaccurate and misleading statement given the fact that this land is Privately owned, it can-not be seen from any such place as given above, and only in case of view 5 can that be enjoyed only by way of the generous consideration and permission of the landowner.</p> <p>These views polled negative feedback and this was taken into account. It is therefore my opinion that this document effectively eliminated the chances of our land being "fairly "considered for inclusion in the final version of the Neighbourhood Development Plan in fact at this point our site no: 12 disappears altogether, it's withdrawn from the document and plays no further part in any further consideration.</p> <p>I have made my concerns known to the responsible parties involved, but to no avail, in fact in my opinion there appears to be a complete disregard and apparent unwillingness to accept the true facts or to allow a correction of the facts and thus allowing a fair continuance of unbiased consideration of this section of nominated land.</p> <p>(A trail of correspondence can be made available if required.)</p> <p>In conclusion I am more than surprised that such a small number of written comments (70) should be allowed to shape the conclusion of the entire Neighbourhood Development Plan. Furthermore, if one considers that there were approximately 12 members of the parish involved who formed the various committees, (as confirmed in an email to me) then that by deduction leaves just 58 members of the parish, out of a possible 800+ that have shaped the outcome of the report.</p> <p>The report does nothing to address the probability of outsiders or "new comers" to the village given the opportunity of additional properties to purchase at affordable prices.</p> <p>Finally, an observation of how easily any NDP could be influenced, shaped or manipulated.</p> <p>Since the two committees working on the NDP working are in parallel one recovering the data information from feedback forms and then redacting personal information, such that this resulting information is then passed forward anonymously to the second committee for completion and amassing of the resulting information.</p> <p>With a little imagination one can easily see how this information passed forward could be vulnerable to unscrupulous censorship and nobody would be any of the wiser.</p> <p>Now I am not suggesting that this has happened with our NDP. Just something I am aware that someone sitting on the steering group committee reportedly said to a third party that they made sure that the land they overlook from their home which was nominated and classified as "Orange Potential for development" as one of the possible sites was effectively eliminated by their own deeds!</p> <p>That site was our land, Site 12</p>
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MA11	Gleeson	<p>Policy MA1 Spatial Strategy</p> <p>Supporting text</p> <p>1. Table 1: Development Site includes “conversions of existing buildings” in the supply of homes for the village. This should not be included, as it relies on permitted development rights, the tests for which may or may not be satisfied.</p> <p>Housing requirement</p> <p>2. The NPPF in paragraph 29 states “Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”. It also states in paragraph 65:</p> <p>“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”</p> <p>3. National policies post-date the development plan, therefore the North Dorset local plan does not provide a figure for the designated area, but provides the minimum number of homes for two levels of settlements. These are ‘Market Towns’ (which each have a separate minimum), and ‘Stalbridge and the Larger Villages’, (which have an overall minimum). Milton Abbas falls into the latter category, and a minimum figure of 825 dwellings is provided for this category of settlements in total.</p> <p>4. How the housing requirement for Milton Abbas has been arrived at for the Neighbourhood Plan is set out in the Milton Abbas Housing Needs Assessment. This in effect simply relies upon the 825 dwelling minimum figure applied pro-rata to the number of homes in the village, and various percentage uplifts on this. It is important to understand the context why the figures are minima in the local plan, and why planning for too few new homes would undermine the strategic policies of the local plan contrary to national guidance.</p> <p>5. The North Dorset Local Plan was adopted in 2016 with the clear acknowledgement that the housing requirement was below need, and a review was required almost immediately upon adoption. This was because the 2015 SHMA was published in the final stages of examination, and indicated that housing need had increased to 330 dwellings per year from the 285 dwellings proposed in the local plan.</p> <p>6. The inspector’s justification for finding it sound, notwithstanding evidence showing the housing need was much higher, included the following:</p> <ul style="list-style-type: none"> • “The Council’s commitment to an early review of the local plan” • “The fact that the Housing Trajectory identifies a significant over-supply of dwellings (when assessed against the
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		<p>annual target) for all years up to 2020”</p> <ul style="list-style-type: none"> • “The high levels of housing delivery achieved in North Dorset in the previous plan period (1994 to 2011)” <p>7. There is now a material change in circumstances:</p> <ul style="list-style-type: none"> • The early review of the plan was anticipated (as set out in paragraph 15 of the IR) to have started by the end of March 2016 with adoption of the revised plan by the end of November 2018. This has not taken place, and a new plan is now not anticipated to be adopted until 2024, six years later. • The anticipated housing delivery did not occur. From 2015 to 2019 only 744 dwellings were delivered in the four-year period when 1,692 dwellings were projected, only 44% of that projected and 65% of the local plan requirement. • The previous high levels of housing delivery achieved are now irrelevant, superseded by four years of under delivery, with some of the lowest levels of housing delivery in the past 25 years occurring in 2016/17 and 2017/18. <p>8. The other justifications the inspector provided for finding the local plan to be sound at that time despite the housing requirement being less than the most recent SHMA were:</p> <ul style="list-style-type: none"> • “The confirmation in modified paragraph 5.14 that the Council would not seek to restrict the supply of additional housing, provided any proposal would accord with the agreed spatial approach” • “The level of flexibility already embedded within the policies of LP1 – for example the housing figures are preceded by ‘at least’ and references are made to potential future areas of growth (for example at Blandford Forum and Shaftesbury)” • “The opportunity provided by Neighbourhood Plans to identify sites for housing” <p>9. The above indicates that, notwithstanding that much more housing was anticipated to have been delivered in the first four years of the plan period than actually has been, the inspector was very much anticipating:</p> <ul style="list-style-type: none"> • The housing requirements to be minima with additional housing not being restricted • That the policies provided flexibility to be exceeded • That neighbourhood plans would identify more sites for housing, over and above these minima. <p>10. It is therefore not appropriate to simply take the 825 minimum and apply it pro-rata to the size of settlement, as the local plan inspector was anticipating neighbourhood plans identifying more sites for housing.</p> <p>11. It is also relevant to look at the 2015 SHMA, given the local plan housing requirement was based upon the 2012 SHMA.</p> <p>12. Milton Abbas falls within the ‘south’ area of the 2015 SHMA. The SHMA recommended 3,820 new dwellings for</p>
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		<p>need of the village, and therefore also should not be used to reduce the requirement. Completions should therefore total eight since 2011 (six of which were affordable).</p> <p>20. Irrespective of the precise figure, completions should not be used to reduce the requirement because:</p> <ul style="list-style-type: none"> • The plan period for the neighbourhood plan is from 2020, therefore should not reflect delivery from 2011 but is in effect a new plan period • The Local Housing Need figure takes into account any previous over/underdelivery as part of the affordability calculation. Therefore, reducing the requirement on the basis of past delivery would be the incorrect approach • The public consultation is about planning for the new homes needed in the future, not what homes were needed from 2011. <p>21. In respect of the public’s views, the consultation statement key findings are:</p> <p>“there is widespread community acceptance of the need for new development, but that this should be limited to 30 new homes or less”.</p> <p>22. Given the government imperative to significantly boost the supply of housing as set out in paragraph 59 of the NPPF, and the public support for 30 new homes, irrespective of completions from 2011, the proposed allocations should be for at least 30 dwellings to be allocated. Additional sites, or reserve sites should be considered to boost the supply of housing up to 74 dwellings to reflect the more recent housing need information.</p> <p>23. By not allocating sufficient new dwellings, the neighbourhood plan would quickly be overtaken by the new Local Plan which would likely need to make additional allocations in the village.</p> <p>24. As set out elsewhere in these representations, we have fundamental concerns in respect of the sites which are allocated. We consider that only 4 dwellings are deliverable on site 5 and none on the other allocated sites, resulting in a significant shortfall that can only be addressed by making other allocations, otherwise the housing need of the village will not be met.</p> <p>25. Additionally, irrespective of the site-specific issues, the lack of any trajectory or deliverability information is contrary to the NPPG meaning the plan cannot comply with the basic conditions.</p> <p>Settlement boundary</p> <p>26. The supporting text at 6.19 states:</p> <p>“The settlement boundary in the adopted Local Plan does not cover the whole settlement as it is centred on St Catherines Well and excludes The Street. The only change to the boundary is to include Sites 5 and 6, as shown on Figure 2, which immediately abuts this area. It would not make sense to include Site 8 within its own settlement boundary, or to extend the settlement boundary arbitrarily to link to it, but its allocation should not be seen as</p>
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		<p>conflicting with the general ‘countryside’ policies that would otherwise apply to this area”</p> <p>27. If the settlement boundary is to be reviewed, it should be on a consistent, methodical and logical basis. As proposed:</p> <ul style="list-style-type: none"> • Two allocations are proposed for inclusion in the settlement boundary, one is not • The more recent completed development at Damers Close is not included in the settlement boundary, which is odd and illogical • We question why the houses around and including New Close Cottages in the north of the village are not proposed for inclusion, or the Street itself. <p>28. The current boundary dates from January 2003, and does require review, but simply including two of the allocations in an updated settlement boundary is not sufficient.</p> <p>Site 7</p> <p>29. Site 7 is in the control of Gleeson Strategic Land, and has not been allocated for development. We consider that the site should have been allocated.</p> <p>30. From the initial stages of the neighbourhood plan process, Gleeson has been open about the potential development of the site. Some details of this engagement with the neighbourhood plan group do appear to have been used in the promotion of the neighbourhood plan as set out in the Consultation Statement. In particular, we note the inclusion of a screenshot of a post on Facebook dated 29 June 2018 which states:</p> <p>“The Neighbourhood Development Plan (NDP) Group has just met with a developer about a proposal for 60-100 new homes within the red line boundary of this image”.</p> <p>31. However, in actual fact, at our meeting with the group on 29 June 2018, it was made clear that Gleeson was considering a development comprising 40-60 homes, as reflected in our subsequent letter dated 31 July 2018, which was published on the Parish Council website and reads as follows:</p> <p>“We subsequently met on 29 June 2018 at which I explained that Gleeson was considering promoting this site for the development of around 40 to 60 dwellings (including affordable housing) and open space, and that because of the site’s size, there was potential to accommodate additional community facilities should there be a local need for something specific and if such facilities could be viably provided. I confirmed that Gleeson did not have fixed plans for the site and that they were open to suggestions concerning community infrastructure. Members of the steering group indicated that whilst there had been an ambition for a new village hall, an application for such a facility at the village sports ground had been refused in 2006. It was now felt that there was less need for a village hall, but that a replacement doctor’s surgery and a skatepark were items of infrastructure that would be worth considering, but that</p>
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		<p>it was important to gather the views of all local residents”</p> <p>32. The poster included on page 4 of the consultation statement produced to advertise the 23rd July open meeting includes the statement:</p> <p>“100 new homes in the field across the road from Catherine’s Well? 200 more cars and bikes using local roads? 300 extra residents....”</p> <p>33. Again, at an early stage in the plan making process, there is further evidence of sensationalist and incorrect information about Gleeson’s intentions being uploaded to social media.</p> <p>34. The most recent consultation which assessed site 7 (alongside various other sites) was in February/March 2019. The outcome of this was that 65% of responses considered site 7 to be suitable or highly suitable (7% neutral, and 25% unsuitable or highly unsuitable). A majority therefore considered the site suitable for development.</p> <p>35. One of the reasons the site was discounted was that it was ‘too large’, yet other sites put forward for consideration were subdivided, such as site 5. It is evident to us that Gleeson’s site has not been considered accurately or fairly throughout the neighbourhood plan preparation process. The SEA has always acknowledged the suitability of the western part of the site for allocation.</p> <p>36. As set out in other representations, the allocations at sites 5 and 8 should be deleted for the plan to meet the basic conditions, whilst the capacity of site 6 needs to be significantly reduced to four dwellings in order to meet the basic conditions.</p> <p>37. Site 7 should be allocated for development. It is a suitable and sustainable site, it is recognised as having development potential within the LUC landscape and heritage assessment (October 2019) that forms part of the evidence base for the emerging Dorset Council local plan, it received significant public support through the neighbourhood plan process and delivers better accessibility to existing facilities in the village than the allocated sites. The site is in the control of a developer, with a current planning application seeking the development 30 dwellings awaiting determination (reference 2/2019/0824/OUT). The application is in outline with appearance and landscaping reserved for future approval, albeit that a detailed landscape parameter plan has been submitted for approval. A copy of the site layout is appended for information, showing how an allocation of 30 dwellings could be accommodated on site 7.</p> <p>38. In the SEA (November 2019 addendum) the justification for not allocating the site includes comments that have been provided in response to Gleeson’s planning application for up to 58 dwellings, in particular, the AONB officer comments and conservation officer comments. Notwithstanding that the application has been amended to address these comments, the approach the neighbourhood plan group has taken with site 6 is to amend the allocation in response to the AONB comments (not simply delete it). Furthermore, the Heritage Assessment of the neighbourhood plan sites by Kevin Morris Heritage Planning (February 2019) confirms that there is no heritage reason why site 7</p>
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		<p>should not be allocated. The local green space assessment and important views also do not identify any constraints.</p> <p>39. There was a highways objection to the planning application in respect of site 8, which shows this site is entirely undeliverable, yet this site has not been deleted from the plan.</p> <p>Summary</p> <p>40. This policy does not meet the basic conditions because:</p> <ul style="list-style-type: none"> • It does not assist with “significantly boosting the supply of housing” as required by national policy as the housing requirement is too low, and should be at least 30 dwellings and up to 74 dwellings • There is no evidence of how the settlement boundary has been reviewed, does not represent the built extent of the village, and does not include all of the proposed allocations • The spatial strategy should allocate site 7 which adjoins the existing settlement boundary for residential development. <p>Policy MA 2 Low Housing Density</p> <ol style="list-style-type: none"> 1. Paragraph 122 of the NPPF requires efficient use to be made of land, yet proposed policy MA2 does not support this and does not help achieve sustainable development. 2. The policy proposes a maximum density of 15 dwellings per hectare (dph). 3. Whilst on some sites in the village 15 dph may be a suitable maximum density, on others it may not. The Housing Density Assessment that forms the evidence base acknowledges that densities in the village range from 1.3 to 53.6 dph, and recognises that seven out of the 19 parcels assessed in the village already exceed 15 dwellings per hectare. It is therefore clear that the appropriate density of a site will very much depend upon its context. 4. The Milborne St. Andrew Neighbourhood Plan included a similar policy, but the examiner required its removal to meet the basic conditions. The examiner’s report¹ in respect of a maximum density policy stated: “the requirements for the density of housing to be below 20dph and for rear garden lengths to be a minimum of 20m are too prescriptive and should both be deleted. Reliance should instead be placed on a case- by-case assessment of schemes against the overall policy objectives and the supporting material”. 5. In order for there to be consistency between other neighbourhood plans in North Dorset, and to achieve sustainable development we consider that the maximum density policy should be deleted from the Milton Abbas Neighbourhood Plan to meet the basic conditions. <p>Policy MA9: Affordable and local housing</p>
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		<p>1. The policy states:</p> <p>“The provision of affordable homes above the level set in the Local Plan is encouraged. Housing sites of 6 or more dwellings will be expected to include bungalows or similar property types designed specifically with older people’s needs in mind, as well as making provision for affordable housing.</p> <p>Legal restrictions such as Section 106 will be included to ensure that any affordable housing provided is prioritised and remains affordable to local people (with a connection to the Parish) in perpetuity. A minimum of 50% of the total number of affordable homes on each housing site should in the first instance be offered to be controlled by a Milton Abbas Community Land Trust (if one exists), or equivalent body, for which an appropriate lettings policy will be agreed between the Trust and Dorset Council”.</p> <p>2. Whilst the aspiration of the policy is acknowledged, it is not considered compliant with national policy or the strategic policies of the adopted local plan. The ownership of land is not a planning matter and the policy cannot specify who the affordable housing units should, or should not be, made available to.</p> <p>3. To meet the basic conditions, the following text must be deleted:</p> <p>“A minimum of 50% of the total number of affordable homes on each housing site should in the first instance be offered to be controlled by a Milton Abbas Community Land Trust (if one exists), or equivalent body, for which an appropriate lettings policy will be agreed between the Trust and Dorset Council”</p> <p>Policy MA10 (site 5) and supporting text</p> <p>1. The allocated site is in part of an open agricultural field within the AONB. This field forms the immediate context of views from a bridleway to the north and west that is also identified in the neighbourhood plan as an important view. There are no boundaries to the north and west of the site and as such it forms the character of the wider area.</p> <p>2. However, whilst recognising that the allocated site is within the boundaries of the Dorset AONB, the Aecom assessment of site 5 states that, “views into and out of the site are screened by the hedgerows/trees located along the site boundaries.” This is factually incorrect as there is currently no landscaped edge to the north or west.</p> <p>3. Under landscape, the site assessment table in appendix A of the submission draft neighbourhood plan describes the landscape as being of “medium sensitivity to development” and observes that, “the site is sufficiently screened from view by the hedgerows/trees located along its boundaries.” The site is then given a ‘neutral’ score. Given that the site is extremely open in views from the north and west, we consider that attributing a neutral score to this site was incorrect, and that the site should have been assessed as having high sensitivity, comparable with Aecom’s assessment for site 4.</p> <p>4. Had Aecom’s landscape assessment of this site been correct, we question whether the site would have been taken forward for further assessment as a potential development site.</p>
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		<p>extend beyond the existing area of settlement, changes have been made to the policy to ensure that the northward extension to the settlement is kept to a minimum, and further guidance included on the appropriate scale of development and landscaping of the site.” We do not believe that the policy responds to the AONB team’s concern and that there are additional landscape, visual and highway safety concerns that have not been addressed, as set out above.</p> <p>14. Paragraph 6.44 of the draft plan explains that buildings are generally 2 storey and states that, “the relatively recent homes built at Damer Close, at between 8.5m to 9.5m to the ridge, appear overly tall (compared to surrounding development) because of their more elevated position, the storey heights and how the land was built up (rather than dug into) in response to the slope. It is therefore proposed that building heights are carefully examined particularly in relation to those of existing dwellings in the surrounding area and whether they may have an undue visual impact.” Policy MA5 therefore states that:</p> <p>“New homes in Milton Abbas should not generally exceed two storeys and the ridge heights should be harmonious with and not notably exceed those within the Milton Abbas Settlement Boundary and in the immediate area of the planned development.”</p> <p>15. The height of the proposed development for site 5 is considered in detail in paragraph 6.75 which states that “Given that the eastern end of the site is also slightly elevated in relation to the road, it will also be important that the overall height of dwellings is not particularly tall in this location. As such, the site is likely to lend itself to single storey dwellings or possibly one-and-a-half storey cottages. The ridge heights of Nos 1 and 2 New Close Cottages and Stonecroft (as measured AOD) provide useful guidelines in this context.”</p> <p>16. Such sentiments are not followed through into the policy as it does not state that dwellings should be bungalows or one and a half storeys high.</p> <p>17. Our analysis has determined that Nos 1 and 2 New Close Cottages and Stonecroft are set at approximately 188m AOD and are 195m to their ridgelines¹. The site extends from approximately 188m AOD in the south east corner to 195m AOD in the north west corner and the majority is above 192m AOD the contour of which generally follows the rear garden of Stonecroft² meaning that everything west of the rear garden boundary of Stonecroft is at a height of above 192m AOD. Allowing for a bungalow of 6m high and a one and a half storey dwelling of 7.5m high, the only location where they would not exceed the height of Nos 1 and 2 New Close Cottages and Stonecroft is immediately adjacent to Blandford Road. Elsewhere within the site, a 6m high bungalow would be at a height of between 197m AOD and 201m AOD and a one and a half storey dwelling would be at a height of between 198.5m AOD and 202.5m AOD. This is shown on the submitted drawing SK021.</p> <p>18. Buildings could therefore be between 2m and 7.5m higher than the existing adjacent buildings depending upon where they are located within the site, notably higher than existing dwellings even as single storey/one and a half</p>
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		<p>storey buildings. Therefore:</p> <ul style="list-style-type: none"> • Development of the allocated site cannot come forward and is undeliverable, unless this part of the policy is deleted, and • If this policy is deleted it will have an even greater impact on the landscape. <p>19. As set out in the response to Policy MA6 Important views, the site allocation for site 5 is contrary to the neighbourhood plan’s policy on important views and particularly on view 12b, and the height of development will exacerbate impacts.</p> <p>20. We note there does not appear to be any landscape assessment of the sites proposed for allocation. The most recent evidence in relation to potential development in Milton Abbas is set out in the Strategic Landscape and Heritage Study for North Dorset Area, Assessment of land surrounding the larger villages. This was prepared by LUC for Dorset Council October 2019 as part of the evidence base to inform the new local plan (extract at appendix 2). This states that:</p> <p>“Development is located on lower ground, meaning that skylines are undeveloped and often marked by woodland.” It goes on to state under guidance and opportunities that “The only feasible area identified is that within and adjacent to the existing modern development to the north of the conservation area. Here there may be the potential for some infill development, but to avoid/ minimise harm it should ideally not be permitted to extend further upslope than it already does e.g. beyond the 190m contour.”</p> <p>21. Allocation of site 5 is entirely above the 190m contour, completely contrary to this evidence. Planning policy guidance states:</p> <p>“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development” (emphasis added)</p> <p>22. Clearly this evidence has not been considered or informed which sites have been included in the submission neighbourhood plan. Solely on this basis, the allocation of site 5 should be deleted.</p> <p>23. In terms of pedestrian access, whilst the requirement for a footpath to be provided to site 6 is acknowledged, this requires site 6 to be delivered first (which is not guaranteed), and the policy for site 6 does not require access through the site. This does not in fact even provide a convenient route to The Street with facilities including post office, pub, Reading Room, church, or to the bus stop at Catherine’s Well.</p> <p>24. Finally, it is not clear as to when the development will come forward.</p>
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		<p>Policy MA11 – Site 6</p> <p>1. Paragraph: 009 Reference ID: 41-009-20190509 of the NPPG states:</p> <p>“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development” (emphasis added).</p> <p>2. Whilst the submission draft neighbourhood plan is not accompanied by a supporting landscape assessment of the sites proposed for allocation, the landscape impacts of potential development around Milton Abbas have been considered as part of the evidence base to support the emerging Dorset Council Local Plan.</p> <p>3. In October 2019, LUC produced its Strategic Landscape and Heritage Study for North Dorset Area: Assessment of land surrounding the larger villages. As can be seen from the attached extracts of this report, under the section entitled guidance and opportunities for mitigation, part of the seventh bullet point states that:</p> <p>“Due to the nature of its special interest, development should not take place within or near the conservation area and opportunities for development in the wider area that do not result in harm to the historic environment will be very limited. The only feasible area identified is that within and adjacent to the existing modern development to the north of the conservation area. Here there may be the potential for some infill development, but to avoid/ minimise harm it should ideally not be permitted to extend further upslope than it already does e.g. beyond the 190m contour.”</p> <p>4. The site that is identified as having potential for development in landscape and heritage terms is the site being promoted by Gleeson.</p> <p>5. Sites 5 and 6 represent two of the highest pieces of land around the village. The development of these two sites would clearly lead to development breaching the 190m contour, identified in LUC’s report as being significant.</p> <p>6. Clearly, the LUC report has not been considered as part of the preparation of the submission draft neighbourhood plan and the development of sites 5 and 6 conflict with its findings. To accord with its findings, the allocation of site 6 should be reduced to that part of the site below the 190m contour, and the quantum of development should be reduced to around four dwellings if the requirement for parking is also retained below the 190m contour, and the density remains 15 dwellings per hectare.</p> <p>7. Policy MA11 site 6 states that up to 15 dwellings will be supported. Notwithstanding the 190m contour issue above, we do not believe (that even with development above the 190m contour) 15 dwellings will be achievable at the required density (not exceeding 15 dwellings per hectare as stated in policy MA2).</p>
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		<p>for development should fall within the settlement boundary.</p> <p>3. Whilst the submission draft neighbourhood plan proposes to amend the settlement boundary of Milton Abbas in order to accommodate other site allocations, the plan is not proposing to amend the settlement boundary to incorporate this allocation, which is clearly an inconsistency in approach. This would mean that the allocation is in conflict with the strategic Policy 20 – The Countryside in the adopted development plan, which states:</p> <p>“Development in the countryside outside defined settlement boundaries will only be permitted if: a) it is of a type appropriate in the countryside, as set out in the relevant policies of the Local Plan, summarised in Figure 8.5; or b) for any other type of development, it can be demonstrated that there is an ‘overriding need’ for it to be located in the countryside”</p> <p>4. The justification for not amending the settlement boundary is contained in paragraph 6.19 of the plan, which states that:</p> <p>“It would not make sense to include Site 8 within its own settlement boundary, or to extend the settlement boundary arbitrarily to link to it, but its allocation should not be seen as conflicting with the general ‘countryside’ policies that would otherwise apply to this area”.</p> <p>5. We suggest that if it is appropriate to allocate the site, then the settlement boundary should be extended to include it. Other made neighbourhood plans in North Dorset have included all their allocated greenfield housing sites within amended settlement boundaries including:</p> <ul style="list-style-type: none">• Fontmell Magna• Hazelbury Bryan• Pimperne• Shillingstone• Sturminster Newton <p>6. Notwithstanding the site being located outside of the proposed new settlement boundary, the allocation of the site is also problematical in terms of the provision of a safe vehicular access. A planning application for the erection of one dwelling on this site was submitted to Dorset Council in 3 July 2019 (reference: 2/2019/0869/OUT). When commenting on the application, Dorset Council Highways stated:</p> <p>“The available visibility to the south of the junction of the private access road with the C31 is sub-standard and does not comply with the guidance provided by Manual for Streets, which requires that a 2.4m by 43m sight line be provided for a road subject to a 30mph speed limit. For this reason, the Highway Authority recommends that permission be REFUSED for the following reason:</p> <p>The existing junction of the private access road with the C31 lacks adequate visibility and its increased use would be</p>
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		<p>likely to cause additional danger to road users”.</p> <p>7. On behalf of Gleeson, i-Transport has prepared drawing ITB14082-SK-002 to illustrate the visibility splays and adopted highway at the junction of the private access road with the C31, and this drawing is attached to this representation.</p> <p>8. The planning application was subsequently withdrawn and to date has not been resubmitted. The neighbourhood plan acknowledges in paragraph 6.84 that:</p> <p>“The Transport Development Management Team at Dorset Council has advised that the junction onto the C31 Blandford Road is currently substandard in relation to visibility splays for a 30mph speed limit area. It will therefore be important that the splay is improved as necessary (which may require the cooperation of adjoining landowners), taking into account the typical vehicle speeds along this section of road”.</p> <p>9. From a deliverability perspective, no evidence exists that the adjoining landowners on both sides of the junction are willing to make land available for the access to be widened in order to satisfy the requirements of the highway authority, or that there is an alternative solution. The allocation cannot therefore comprise sustainable development, does not meet the basic conditions and should be deleted.</p> <p>10. Gleeson is promoting a site which is fully below the 190m contour line, which can provide 40% affordable homes, has an access that can be safely provided with minimal hedgerow loss, and which is located within the existing village envelope. This site should be allocated for 30 dwellings in order to meet the village’s housing need.</p>
MA12	Environment Agency	<p>We support Policy MA10: Site 5 and MA11:Site 6 in terms of your selection of sites and understand that detailed Flood Risk Assessments will be conducted. The Lead Local Flood Authority would need to review any application for planning permission. Further guidance on the approach to individual development proposals, or where a Neighbourhood Development or Community Right to Build Order is proposed, in an area at risk of flooding can be found at: https://www.gov.uk/guidance/flood-risk-and-coastal-change</p> <p>Biodiversity The National Planning Policy Framework (NPPF) is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution. Similarly the Government’s 25 Year Environment Plan (February 2018) has policy for embedding an ‘environmental net gain’ principle for development, including housing and infrastructure.</p> <p>We are pleased that Policy MA1 : Spatial Strategy makes reference to new residential development needing to avoid giving rise to any adverse impacts on the integrity of Poole Harbour European site and we support your position regarding this nutrient neutrality.</p> <p>Neighbourhood Plans have the potential to affect biodiversity or geodiversity therefore they should seek</p>

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		<p>opportunities to work collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Equally, they should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area.</p> <p>Biodiversity enhancement in and around development should be led by a local understanding of ecological networks, and should seek to include:</p> <ul style="list-style-type: none"> • habitat restoration, re-creation and expansion; • improved links between existing sites; • buffering of existing important sites; • new biodiversity features within development; and • securing management for long term enhancement. • Green/blue infrastructure and recreational opportunities <p>Further guidance can be found at: https://www.gov.uk/guidance/natural-environment</p> <p>Water Quality and Resources Adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.</p> <p>Protecting and improving water bodies may be relevant when drawing up a neighbourhood plan or considering a neighbourhood development order. It is always useful to consult the local planning department and the local sewerage infrastructure provider about whether water could be a concern. This is especially prevalent as you have identified that Policy MA10: site 5 and MA11: site 6 are within the consultation zone identified by Wessex Water to minimise risk of development contributing to groundwater inundation of sewers.</p> <p>Water efficiency measures should be incorporated into development as this conserves water for the natural environment and allows cost savings for future housing occupants.</p> <p>Further information can be found at: https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality</p>
MA13	Dorset Council	<p>Vision and Objectives:</p> <p>Milton Abbas is one of Dorset’s most recognisable villages, with some notable history (as outlined on page 6 of the submitted plan). The long street of near identical estate workers’ cottages is an iconic scene of rural Dorset. In spatial terms, the parish includes an extensive range of historic and environmental constraints, including being in the Dorset AONB, a conservation area (designated in 1970), a large number of listed buildings / structures (including Grade I), a registered park and garden (Grade II*), and various scheduled monuments. The parish also falls in the Poole Harbour</p>

catchment area meaning any new development must not lead to a net increase of nitrates running into Poole Harbour. It is also noted that the village is extremely rural in feel, being off the beaten track and located over two miles from the nearest main road (A354). None of this is to say that new development is not appropriate; the village has a number of services including a doctors’ surgery and a pub, and these community facilities are part of the reason Milton Abbas is identified as one of North Dorset’s 18 ‘larger villages’. However, it is clearly necessary to ensure that new development is done sensitively, and meets the needs of the community. With this in mind, Dorset Council recognises the ambitions of the community to produce a plan that aims to meet local housing need but at the same time ensuring it is in keeping with the rest of the village. The Vision on page 11 states: “Our vision is to meet the local housing needs of Milton Abbas in a positive way that is appreciative of our unique landscape, heritage, distinctive rural features and residents.” This, and the 5 objectives listed below it, appear to be entirely apt given the context.

Figure 2 and Policy MA1

It is noted that Figure 2 shows a proposed revised settlement boundary. However, in order for this to carry full weight, reference should be made to it in policy text. We suggest that Policy MA1 is amended so that after “settlement boundary” (on the 4th line) it states: “(as amended by Figure 2)”.

We would also suggest that a larger scale map is used to show the revised settlement boundary and allocated sites, overlaid on an OS Mastermap.

Policy MA2

This policy requires a residential density lower than what is typically used by Dorset Council for estimating site capacity. In recent SHLAA work we are using an estimated density of 20-30dph for Dorset villages. It is recognised that the policy is a result of detailed work that has considered existing densities in the village, and that the producers of the plan are assumed to be aware of the implications (more land is required). Despite this, Dorset Council feels such a policy is overly prescriptive as there may be valid reasons for building at higher densities on certain sites, so long as the development is generally in keeping with its surroundings. The criteria set out in Policy MA4 (particularly “The design should have regard to the local prevailing scale, massing and spacing”) seems more than adequate to prevent incongruous design and overdevelopment.

Policy MA3

We appreciate that on-street parking is an issue for many Dorset villages, and this has led many neighbourhood plans to propose policies on parking. We note that on many occasions, the examiner has recommended that such policies should be struck out where they deviate from the County standard (e.g. Milborne St Andrew and Motcombe). However, it is noted that Policy MA3 closely resembles Policy HB22 of the Hazelbury Bryan NP, which has been examined and made.

		<p>Policy MA4</p> <p>This policy sets out a number of criteria for ensuring that new development is in keeping with the existing layout and urban grain of the village. As such it is supported and as noted above, this approach is preferred to the more quantitative approach set out in Policy MA2.</p> <p>Policy MA5</p> <p>This policy establishes a reasonable compromise between prescription and flexibility. For example, “The choice of materials should help a new development to fit harmoniously with its surroundings but does not have to exactly match...” and “New homes in Milton Abbas should not generally exceed two storeys...” As such, it is supported.</p> <p>Policy MA6</p> <p>This policy establishes a number of important views valued by the local community. As noted above, the village is recognised for its large number of historic/heritage assets, and for its views as part of the wider AONB. Such a policy therefore is entirely appropriate and is supported.</p> <p>Policy MA7</p> <p>This identifies a small number (9) of Local Green Space in the village which are identified for being important to the local community. As it is understood that the respective landowners have been identified and consulted, these are supported.</p> <p>Policy MA8</p> <p>As the village is situated in the Dorset AONB, and as noted above, lies off the beaten track, a dark skies policy seems appropriate. The policy also appears to have strong local support (para 6.64 refers to 84% local support for such an approach). It seems appropriate to allow external lighting in certain exceptions (e.g. health and safety). However, the word “absolutely” on the third line possibly makes this part of policy difficult for a planning application to reasonably demonstrate. Suggest amend the beginning of the third sentence to: “External lighting schemes should be avoided unless required for health and safety or security reasons...”</p> <p>Policy MA9</p> <p>This policy seeks to go beyond the affordable housing requirements of the local plan. As such, there will be concerns among some regarding the viability of any additional requirements. In addition, although Dorset Council is largely supportive of Community Land Trusts, it does not seem appropriate to prescribe them in a planning policy and the planning system does not usually consider ownership a material consideration.</p> <p>Policies MA10, 11, and 12</p> <p>These policies allocate land over three sites for housing to meet local need. They are a result of a call for sites process</p>
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		<p>and a documented site selection/scoring process (summarised in Appendix A). They also consider design and access issues for each site and state how these matters should be addressed in the policy text (plus illustrative diagrams). As such, these policies are supported as an appropriate method to meeting the housing needs of the parish.</p>
<p>MA14</p>	<p>Dorset AONB</p>	<p>Overall – we welcome the production and submission of this Plan which, on the whole, appears to be well written and considered. The Plan makes positive connections with the Dorset AONB with a number of the policies being complimentary to the conservation and enhancement of the designated area, such as:</p> <p>POLICY MA4. THE PATTERN OF DEVELOPMENT AND STREET SCAPE</p> <p>To ensure that any new development respects the rural character and historic distinctiveness of Milton Abbas within an Area of Outstanding Natural Beauty</p> <p>POLICY MA5. BUILDING DESIGN</p> <p>POLICY MA6. IMPORTANT VIEWS</p> <p>Local Important Views (listed in Table 2) have been identified as valued by the local community and should be respected. Development that would significantly intrude and impact on their enjoyment, by virtue of scale, massing, design or location, will be resisted.</p> <p>POLICY MA7: LOCAL GREEN SPACES</p> <p>Local Green Spaces (listed in Table 3) have been identified as important to the local community. Other than in very special circumstances, no development may take place which would harm the enjoyment of these spaces or would undermine their importance</p> <p>POLICY MA8: DARK SKIES</p> <p>Development should be designed to conserve and enhance the intrinsic quality of the dark night skies.</p> <p>In line with the previous consultation advice provided by the AONB Team the following policies within the AONB Management Plan are highlighted along with Guidelines contained within the AONB’s Landscape Character Assessment:</p> <p>AONB Management Plan Policy C1.a states: “Support development that conserves and enhances the AONB, ensuring sensitive siting and design respects local character. Development that does not conserve and enhance the AONB will only be supported if it is necessary and in the public interest. Major development decisions need to include detailed consideration of relevant exceptional circumstances.”</p> <p>Policy C2.c states that: “Local and Neighbourhood Plans must be supported by a robust landscape evidence base.”</p> <p>Policy C2.d states that: “The key test of a proposal against the statutory purpose of the AONB will be its ability to</p>

		<p>demonstrate that the proposed change would conserve and enhance landscape and scenic beauty.”</p> <p>Policy C2.f states that: “Proposals that are harmful to the character and appearance of the area will not be permitted unless there are benefits that clearly outweigh the significant protection afforded to the conservation and enhancement of the AONB. Where impacts cannot be mitigated, planning gain and compensatory measures will be considered.”</p> <p>Policy C4.h states that: “Avoid large scale and/or high-density housing and employment development at settlement edges when such development weakens the character and appearance of the countryside.”</p> <p>The LCA Planning Guidelines for the type of landscape in which the village is based state we should:</p> <ul style="list-style-type: none"> • Conserve the pattern of tight knit villages and views of key landmarks. • Ensure new housing development is complimentary to settlement scale, form and density and secure appropriate mitigation measures. Promote the use of previously developed land before greenfield sites, where this is well connected to settlement form. Require appropriate materials and architectural detailing, recognising the variable viability issues affecting market and affordable homes. Reduce the impact of associated features, including lighting, parking and access. <p>With regards the previous comments submitted in July 2019 and associated ‘concerns’ over Sites 5 and 10 – we are satisfied that Site 10 (Land at Windmill Clump) has been withdrawn from the Plan.</p> <p>With regards Site 5 (Land at Langham Farm) informal advice was provided in October 2019 with regards accommodating a small number of dwellings within this area. Concern was raised about the constraints of the Site – given its sensitive village ‘edge’ location and its relationship with existing dwellings.</p> <p>The Plan, in para. 6.74 states that “views into and out of the Site are screened by the hedgerow/trees located along the boundaries”. This is not entirely accurate – as there are clear views across the Site from the bridleway that runs to the immediate west.</p> <p>Figure 6 within the Plan illustrates a new landscape edge treatment to the north of the Site – but it is unclear as to what is proposed for the existing hedge that divides the Site from the Community Gardens area? This hedge, as existing, is an important local boundary feature and should be retained and protected. This would entail providing a ‘buffer’ between the hedge and any new development – creating a rather ‘linear’ and disconnected site.</p> <p>Taking the above into account there remain concerns over the suitability of this Site in relation to the following AONB Management Plan policies:</p> <p>C1a “Support development that conserves and enhances the AONB, ensuring sensitive siting and design respects local character. Development that does not conserve and enhance the AONB will only be supported if it is necessary and in the public interest”</p>
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		<p>C2f “Proposals that are harmful to the character and appearance of the area will not be permitted unless there are benefits that clearly outweigh the significant protection afforded to the conservation and enhancement of the AONB. Where impacts cannot be mitigated, planning gain and compensatory measures will be considered”.</p> <p>The AONB Landscape Character Assessment planning guidance for this landscape states;</p> <p>“Ensure new housing is complimentary in scale, form and density and secure appropriate mitigation measures”. The linear development of 6 dwellings along this ‘edge’ would appear to go against the thrust of this guidance.</p> <p>We are, therefore, unable to see how the small number of houses could be comfortably accommodated at this settlement edge – given the constraints of the existing hedgerows/levels/ and poor relationship with the existing built development.</p> <p>With regards Site 6 it is acknowledged that the number of dwellings that could be accommodated within this area has been adjusted from 12 to 15. We are happy to support the proposals for this area.</p>
MA15	Natural England	<p>Natural England support the policies to protect valued green infrastructure within and around the urban setting of the village.</p> <p>Natural England acknowledge that the SEA has adequately assessed the allocation sites with reference to the need to provide mitigation for likely impacts to internationally designated wildlife sites under the Habitat Regulations 2017, such compliance with the Poole Harbour Nitrate Supplementary Planning Document and the need to consider Greater Horseshoe Bat foraging zones from Bryanston Site of Special Scientific Interest. However, this is not reflected in the identified policies and does not mutually support the policies at a former district local plan level.</p> <p>Whilst the international and nationally designated sites were assessed and ruled out in the SEA. Sites of Nature Conservation Interest are present within the neighbourhood boundary, have not been identified in the SEA or reflected in the plan and have the potential to be directly or indirectly adversely impacted by windfall development coming forward within the plan period. Furthermore, it is recognised that the allocation sites have received a plan appropriate level of survey however, should windfall development come forward, there is no environmental policy to assess applications against at a local level. The parish council may wish to specify encouraging the use of the Dorset Biodiversity Protocol to take account of SNCI’s and biodiversity if a development triggers certain thresholds.</p> <p>In conclusion, Natural England agree with the assessment process informing the NP but do not believe that the environmental assessments have adequately fed through to policy to support the North Dorset Local Plan nor is it in line with National Planning Policy Framework to be silent on environmental considerations.</p>