

SHILLINGSTONE NEIGHBOURHOOD PLAN – SUBMISSION DRAFT

RESPONSE OF NORTH DOREST DISTRICT COUNCIL

North Dorset District Council provided detailed comments on the pre-submission draft version of the Shillingstone Neighbourhood Plan in October 2015. The following comments are based on those previous comments, taking into account amendments made to the NP following the pre-submission consultation exercise.

Introduction

Plan focus

NDDC is supportive of a focused and concise plan and welcomes the three broad areas for which the plan is seeking to introduce locally specific policies for Shillingstone.

Plan period

The Plan period of 2016 to 2031 is supported by NDDC, the adopted North Dorset Local Plan Part 1 period being 2011 to 2031.

Local Character

Policy 1: Local Green Spaces

NDDC supports the policy intent within the proposed wording of Policy 1 to protect designated areas from development. It is considered, however, that, whilst noting the table on page 6, clarity for the reader would be improved if the policy itself listed the designations in addition to referring to the LGS being shown on the Policies Map.

Whilst supporting the policy intent, NDDC does have a concern regarding the process of designation of LGS within the Plan. Basic Condition A requires the neighbourhood plan to have regard to national policies and advice contained in guidance issued by the Secretary of State. Paragraph Ref ID 37-019-20140306 of the Planning Practice Guidance, 'Does land need to be in public ownership?', states that qualifying bodies should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. It would appear from the Shillingstone NP Consultation Statement and the Shillingstone Local Green Spaces evidence base document (SUP06) that this has not happened in certain, at least, of the proposed designations (LGS-HRC, LGS-POR and LGS-MAN).

The supporting text to Policy 1 suggests that the Important Open and Wooded Area protection in the parish will be withdrawn on the making of the Plan. This is not possible, the policy remaining 'saved' until it can be deleted/replaced through the review of the adopted Local Plan Part 1. As part of that process all IOWAs are being reviewed. Where neighbourhood plans are in existence, the policies of the plans will be taken into account in the IOWA review.

Policy 2: Rural Lanes and Tracks

Policy 2 is considered to be in line with the policies of the adopted Local Plan Part 1, specifically Policy 24 Design.

Policy 3: Character and Design

Policy 3 is considered to be in line with the policies of the adopted Local Plan Part 1, specifically Policy 24 Design. However, further consideration should be given to the exact wording of the policy as the 3rd paragraph reads as though new development can remedy negative features associated with adjoining buildings. This is not possible. In addition, the section on the central character area (The conservation area) describes its distinctive features as a mixture of house styles and sizes. This combined with the suggested policy essentially opens the door to any form of development. Whilst the policy seeks to secure a high quality of development this could be undermined by the supporting text. It may be better, if the policy is to be fairly generic, to be more precise within the general text to enable a potential developer to clearly understand what is required. As an example, one could divide the central area into buildings of a lesser scale which reflect the local vernacular together with more polite buildings of the 18th or 19th centuries which reflect architectural fashion. If then seeking new buildings which fit within this context there is more to draw from in terms of influence.

Community Facilities

Policy 4: Important Community Facilities

NDDC supports the policy intention within Policy 4 to safeguard community facilities and acknowledges the amendment to the policy in light of the Council's previous comments. However, it is still considered that the involvement of the local community is a procedural matter, not a land use or planning requirement, and so reference to such should be excluded.

Locations of New Development

Plan Housing Target

NDDC notes that the Neighbourhood Plan evidence suggests that about 40 new homes over the plan period would be a good amount of development for the area. It is understood that this indicative Plan target is based on the 'Housing Needs Analysis' for Shillingstone as prepared by URS in March 2015 and updated by Jo Witherden in July 2015 to take account of changes to the Local Plan Part 1. This analysis is acknowledged.

Nevertheless, it should be noted that the Local Plan Part 1 does not set out a figure for the number of new dwellings to be built at Shillingstone over the Plan period. It should also be noted that the 825 homes to be provided in the countryside (including Stalbridge and the 18 larger villages) is only a minimum figure, this distinction having been endorsed in the Planning Inspector's Report for Local Plan Part 1 in his consideration of whether the District's housing needs have been properly identified and will they be met. In relation to this it should further be noted that a consequence of the Planning Inspector's Report is the District Council's commitment to an early review of the Local Plan which will necessarily reassess housing needs.

The Council would also point out that housing needs' data is constantly evolving as circumstances change. For example the 2015 Eastern Dorset Strategic Housing Market Assessment sets out a revised objectively assessed housing needs figure in respect of North Dorset. New evidence regarding housing needs, including at the parish level, could be considered through any possible future review of the neighbourhood plan.

Affordable Housing Definition.

NDDC considers that the definition of affordable housing should be consistent with the definition contained in current national planning policy and guidance.

Policy 5: Development within Settlement Boundary

Policy 5 is considered to be in general conformity with the strategic policies of the adopted Local Plan Part 1, specifically Policy 2 Core Spatial Strategy. It is noted that in addition to the sites allocated in the Plan for up to 44 new dwellings, additional sites may also come forward within the settlement boundary, thereby providing further scope and flexibility in terms of meeting housing needs.

Policy 6: Housing types and sizes

NDDC notes that the local evidence suggests a greater need for smaller dwellings which is the opposite to the district-wide position set out in Local Plan Part 1 Policy 7 - Delivering Homes which seeks 40% market housing as 1 or 2 bed and 60% 3 or 4 bed. The reverse split being sought for affordable housing i.e 60% 1 or 2 beds.

Possible Development Sites

Policy 7: Antell's Haulage Yard

Policy 11 of the adopted Local Plan Part 1 provides support for economic development in the countryside by enabling rural communities to plan to meet their own local needs, including through neighbourhood planning. However, it also seeks to protect existing employment sites from other forms of development. Policy 11 also supports enhancement to the local economy and employment opportunities.

The loss of an existing employment site in use is of concern. It should be noted that part of the site was recently granted planning permission (2/2015/1910/FUL) for the change of use to a secure storage facility by an existing business operating outside of the District. In determining the planning application the Council considered that the proposal would not reduce the level of employment based on the existing site and the reduction in operational space would not prejudice the long term viability of the existing business.

It is noted that the proposed use is for housing and that live-work units would be supported.

Policy 8: Land off Candy's Lane

The site is a designated IOWA, justification for its lack of inclusion as a proposed Local Green Space being provided in the submitted evidence base.

Policy 9: Land adjoining the Cobbles

It is noted that the existing settlement boundary has been amended to include what is considered to be a sensitive site due its location within the setting of a listed building and the conservation area, together with the undeveloped nature of this part of the village.

Policy 10: Hine Town Lane North of the Old Ox

Together with Policies 11 and 12 this site forms a single IOWA, its lack of inclusion as a proposed Local Green Space being provided in the submitted evidence base. The site is considered to have scope for a comprehensive development and provides opportunity to

meet a substantial amount of Shillingstone's housing needs over the plan period. Development on this site is likely to have a negative impact on the NP objective of retaining the rural character of Hine Town Lane, therefore careful consideration needs to be given to the conflict between the two policies. A planning application (2/2015/0382/FUL) for 5 dwellings at the north western extent of the site was refused on grounds which include that it would represent an inappropriate form of piecemeal development resulting in a detrimental impact on the character and appearance of the area.

Policy 11: Land at the Old Ox

Together with Policies 10 and 12 this site forms a single IOWA, its lack of inclusion as a proposed Local Green Space being provided in the submitted evidence base. Planning consent (2/2015/1494/FUL) has recently been granted for 3 dwellings and holiday accommodation to support the viability of the Old Ox.

Policy 12: Hine Town Lane South of the Old Ox

Together with Policies 10 and 11 this site forms a single IOWA, its lack of inclusion as a proposed Local Green Space being provided in the submitted evidence base. In addition the site is in close proximity to the sites being put forward for development under Policies 10 and 11.

Policy 13: White Pit Farm Buildings

The site is beyond the settlement boundary but could provide some significant public benefit in terms of house numbers, affordable housing provision, links to the settlement, investment in non-designated heritage assets ensuring their long term retention and re-use of redundant farm buildings increasing the sustainability of development.

