Date: 18 January 2018

Edward Gerry North Dorset District Council

BY EMAIL ONLY



Dear Edward,

# **Local Plan Review – Issues and Options Consultation**

Thank you for consulting Natural England on the Issues and Options for the North Dorset Local Plan Review. Your consultation was received by this office on 20 November 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

## **Comment on Environmental Issues section**

Natural England recommends that the Map 2.2 Key Environmental Constraints Map is amended to include the areas of land included in the existing and potential Dorset Ecological Network. Please note the Dorset Ecological Network maps are now available for viewing on Dorset Explorer and the digitised layers available from the Dorset Environmental Records Centre (DERC). The need to identify an ecological network is set out in National Planning Policy Framework paragraph 109.

## **Comment on consultation questions**

Natural England has the following comments on the Issues and Options Paper. The numbering used follows that set out in the consultation:

Q1. Do you consider that a housing need figure of 366 dwellings a year is an appropriate figure on which to plan for housing growth in North Dorset? If not, please set out what you consider to be an appropriate figure and provide reasons for this.

No comment.

Q2. Do you consider that additional employment land should be allocated for development at Blandford as part of the Local Plan Review?

No comment.

Q3. Do you consider that there is a need to allocate additional employment land in any other part(s) of the District?

No comment.

Q4. Do you consider that the existing spatial strategy, as set out in LPP1, should be amended to allow for some limited growth at Stalbridge, beyond just meeting local needs?

No objection in principle to additional development at Stalbridge.

Q5. Do you think that the Council should consider implementing any other alternative spatial strategy through the LPR? If so, please explain your reasons why.

No comment.

Q6. Do you agree with the conclusions regarding the areas of search identified at Blandford?

## Areas A, B and C

These areas of search lie within, or partly within the Cranborne Chase AONB and may also affect the setting of the AONB. Given the strong presumption against significant development within the protected landscape of an AONB (NPPF paragraphs 115 & 116), Natural England recommends that proposals for significant development within the AONB are not carried forward *unless* your authority is satisfied there is a clear local need that cannot be met on sites outside the AONB. If development proposals are promoted that may harm the setting of the AONB then the strategy should include options for providing appropriate off site landscape moderation measures that would help mitigate any adverse impacts to the AONB. Natural England would be happy to discuss how this might be achieved.

These sites are also within the range of the Barbary Carpet Moth's Dorset stronghold in France Firs, the inclusion of barbary bushes would be a highly suitable way in which any developments in these search areas could contribute to the net gain requirements of the NPPF paragraphs (7, 109 & 118).

#### Area D

Natural England notes and shares the concerns regarding the setting of the AONB and has no further comment.

#### Area E

Additional development within the area of search may in combination with the existing permissions may harm the setting of the Cranborne Chase AONB. Any proposals should therefore seek landscape moderation measures that help screen the developments from views from the wider countryside.

## Area F

Any land allocated in the area of search must take account of its value to foraging greater horseshoe bats from the Bryanston SSSI. Development within this sensitive area will need to be limited and also ensure an over net gain in bat foraging opportunities within 2km of the Bryanston SSSI.

## Areas G, H and I

All three search areas also provide important foraging areas for greater horseshoe bats, particularly the wet meadows and woodland along the River Stour corridor. Natural England therefore supports the assessment that the areas have no or very limited scope for new development.

#### Area J

Any development proposals would need to consider how it might enhance foraging areas and flyways for greater horseshoe bats. For example extending the Milldown LNR with associated woodland and permanent grassland creation would be beneficial.

### Area K

Natural England notes and shares the concerns regarding impacts on the AONB and supports the area's exclusion from further assessment.

Q7. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

The section on constraints set out at para 6.15 should include impacts on the foraging areas and flight ways of the nationally important Greater horseshoe bat colony that occupy the Bryanston SSSI. Similarly, the section on opportunities set out at para 6.16 should include measures for the enhancement of Greater horseshoe bat foraging habitats within 5km of the Bryanston SSSI.

The constraints section should also include areas mapped as part of the Dorset Ecological Network.

Q8. What are the additional infrastructure requirements that are likely to result from potential future development at Blandford?

No comment

Q9. Do you agree with the conclusions regarding the areas of search identified at Gillingham?

#### Area A

Natural England has no concerns with the assessments.

### Areas B and D

The areas of search lie in close proximity to the Royal Forest. Potential for development is likely therefore to be limited and should be required to deliver enhanced public access and landscape character enhancement measures within the former extent of the forest.

## Areas C, E and F

Natural England has no concerns with the assessments.

#### Areas H and I

Natural England has no objection in principle to new development in the areas of search. Proposals should however seek ways of delivering a biodiversity net gain along with substantive new areas of natural public open space.

## Areas J and K

Natural England has no concerns with the assessments.

Q10. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

New development at Gillingham has the potential to secure significant high value public access to natural green spaces, including new access to the town's rivers. Local plan policies should seek to ensure this potential is identified and realised through any allocations. In particular, a link between any new allocations and the delivery of the enhancement of the former Gillingham Royal Forest should be a key consideration.

The constraints section should also include areas mapped as part of the Dorset Ecological Network.

Q11. What are the additional infrastructure requirements that are likely to result from potential future development at Gillingham?

No comment

Q12. Do you agree with the conclusions regarding the areas of search identified at Shaftesbury?

### Areas A and B

Natural England agrees that further development in these areas have the potential to harm the setting of the Cranborne Chase AONB. Important considerations for the further assessment will be any impacts on views to and from the AONB and the scope for enhancing the interface between the built environment and surrounding countryside.

Areas C, D E, H and I

Natural England has no concerns with the assessments.

Areas F and G

The Breach Fields SSSI and its associated buffer areas and ecological network areas represent significant constraints in search areas F and G.

Q13. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

The constraints section should also include areas mapped as part of the Dorset Ecological Network.

Q14. What are the additional infrastructure requirements that are likely to result from potential future development at Shaftesbury?

No comment

Q15. Do you agree with the conclusions regarding the areas of search identified at Sturminster Newton?

Areas A and B

Natural England agrees that the areas to the north and east of the town are likely to have more potential for significant development than the other Sturminster areas of search.

Areas C D to I

Natural England has no concerns with the assessments.

Q16. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

The constraints section should also include areas mapped as part of the Dorset Ecological Network.

Q17. What are the additional infrastructure requirements that are likely to result from potential future development at Sturminster Newton?

No comment

Q18. Do you agree with the conclusions regarding the areas of search identified at Stalbridge?

Natural England has no concerns with the assessments provided for the Stalbridge areas of search.

Q19. Are there any further issues relating to the areas of search that you think should have been considered as part of the assessment process?

The constraints section should also include areas mapped as part of the Dorset Ecological Network.

Q20. What are the most important infrastructure requirements that are likely to result from potential future development at Stalbridge?

No comment

Q21. Do you agree with the Council's proposed approach in relation to future development at the eighteen larger villages within the District or do you think that the Council should consider an alternative approach?

No comment

Q22. Do you consider that the existing reference to nine dwellings in Policy 9 of LPP1 should be removed from the policy to allow larger schemes to come forward where there is evidence of local need in excess of that which could be met by the provision of nine dwellings?

### No comment

Q23. Do you consider that the existing policy approach, which seeks to prevent exception sites coming forward adjacent to the four main towns within the District, should be amended?

#### No comment

Q24. Do you consider that the Council should continue with its existing policy approach, which allows for a small number of market homes on rural exception sites?

#### No comment

Q25. Do you consider that the Council should facilitate the provision of self-build housing by any, some, or all of the following options? a. Allowing serviced plots to come forward under the current development plan policies. b. Updating Policy 7 (Delivering Homes) in the Local Plan Part 1 to promote the provision of serviced plots of land for self-build housing. c. Requiring on sites above a certain size that serviced self-build plots should be made available as a proportion of the total number of dwellings permitted (with or without a minimum number being specified) on-site. d. Allowing a proportion (up to 100%) of self-build plots on exception sites (with controls over the resale value of the properties). e. Identifying land in public ownership which would be sold only for self-build development. f. The use of Local Development Orders to facilitate self-build development.

#### No comment

Q26. Are there any other approaches that could be used to meet the demand for self-build housing?

## No comment

Q27. Do you consider that the existing hierarchy and network of centres, as set out in LPP1, should be amended to include Stalbridge as a 'local centre'?

## No comment

Q28. Do you agree that those IOWAs, which are protected from development by other planning policies or legislation, should be deleted?

Natural England would have no objection to the removal of IOWAs protected by legislation. However, consideration should be given to ensure that other polices protecting the IOWAs are of similar or greater weight in terms of protecting the identified benefits that a particular IOWA serves to a local community.

Q29. Do you consider that the land which is identified and safeguarded for the Shaftesbury Outer Bypass and the Charlton Marshall and Spetisbury Bypass should continue to be identified and safeguarded for such purposes?

No comment.

For any queries relating to the specific advice in this letter only please contact Emily Greaves on
For any new consultations, or to provide further information on this consultation please
send your correspondences to

Yours sincerely

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Natural England - Dorset, Hampshire and Isle of Wight