

Puddletown Neighbourhood Plan – Regulation 16 consultation

Comments from Dorset Council

August 2020

Introduction

This document sets out the comments on the Puddletown Neighbourhood Plan Submission Draft (Regulation 16 – May 2020). This response considers the extent to which the Plan complies with National Policy and Guidance (primarily the National Planning Policy Framework 2019) and is in general conformity with the strategic policies of the development plan for the area (in particular the adopted Joint West Dorset, Weymouth and Portland Local Plan). The neighbourhood plan should also contribute to sustainable development and be compatible with EU obligations including the SEA Directive of 2001/42/EC.

West Dorset District Council (one of the predecessor authorities to Dorset Council) actively engaged with Puddletown Parish Council throughout the preparation of the Neighbourhood Plan. This engagement has helped to shape the Plan and as such this representation only contains commentary on the Plan where Dorset Council considers issues remain.

Within the comment below, recommendations and suggestions have been made. Recommendations are where the Council is of the view that a change needs to be made to the plan to ensure that it complies with national policy and in general conformity with the Local Plan. Suggestions are where the Council consider a minor change may aid with the interpretation or clarity of the plan.

Chapter 1: Introduction

Plan Period

Paragraph 1.1.12 and front cover state that the plan period will run from 2019 (when it was drafted) to 2031. Dorset Council support this proposed timeframe as it matches the Adopted West Dorset, Weymouth & Portland Local Plan 2015.

Monitoring & Review

Paragraph 1.1.13 outlines the monitoring arrangements for the Puddletown Neighbourhood Plan including indicators used for an annual review.

Dorset Council considers that monitoring and reviewing plans is important to ascertain whether or not policies are effective and to determine if actions or projects are being achieved.

Chapter 2: Local landscape character and the built environment

Policy 1. Local Green Spaces

Dorset Council is supportive of Policy 1 that cross refers to Table 1 which lists ten local green space designations alongside the reasons for their designation. The accompanying map 2 Local Green Spaces (Private and Public) then clearly depicts their location.

We are aware of several representations that have expressed concerns regarding the designation of private spaces as Local Green Spaces. Planning practice guidance (Paragraph: 017 Reference ID: 37-017-20140306) however states that “Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty).” The clarification within the Plan at the end of page 8 and under table 1 is therefore welcomed.

Policy 2. Local Landscape Features

Dorset Council is supportive of policy 2 which seeks to respect and enhance key local landscape characteristics.

Policy 3. Village character

Dorset Council is supportive of the objective of Policy 3 which is “to ensure that the village retains its links with the countryside and inherent feel as a rural-based community.”

Policy 3 bullet point 1 relates to “limiting infill development to the re-purposing and/or extensions of existing buildings within the defined development boundary, avoiding the loss of large areas of garden / paddock or other undeveloped spaces that make a positive contribution to the local character” Resisting all new build infill development within the Defined Development Boundary would be difficult.

Suggestion: Suggest amending the wording to “limiting infill development, where possible, to the re-purposing and/or extensions of existing buildings within the defined development boundary. New build infill development should be avoided if it would result in the loss of large areas of garden / paddock or other undeveloped spaces that make a positive contribution to the local character.”

Within paragraph 2.4.2, there is reference to earlier consultations and the desire of local residents to see incremental infilling resulting in the loss of large areas of garden and undeveloped land within the village stopped. If this is a direct quote, it should be identified as such. If this is however an aim of the Neighbourhood Plan, it should be reworded as it is not possible to stop infilling unless there is a clear harm that would result.

Recommendation: either identify the text as a quote (e.g. through the use of quotation marks and italics) or amend the wording to “should not be encouraged”.

The Council’s Conservation Officer has commented that within paragraph 2.5.2 there are references to ‘undesigned’ and ‘historic features’.

Suggestion: Consider replacing these with ‘non designated’ and ‘heritage assets’ respectively to reflect national and local policy language.

Policy 4. Respecting the history of Puddletown

Dorset Council is supportive of the broad aims of Policy 4 which requires development within and forming the setting of the Conservation Area to “respect its key characteristics and features of special interest” summarised in table 2. The Plan also helpfully lists and identifies locally important buildings within table 3. It is noted that the Puddletown Area has a strong connection with the

intentionally recognised author Thomas Hardy and the Tolpuddle Martyrs and we welcome support for proposals that raise wider awareness.

The Council's Conservation Officer has however made several specific suggestions to the supporting text to better reflect national policy wording.

Paragraph 2.5.5

Suggestion: 'Whilst these are not designated, these are nevertheless important non-designated heritage assets and a material planning consideration. Their significance and impacts on it need to be demonstrated in proposals to see if any harm is justified...' You may wish to consider adding a further sentence 'Other non-designated heritage assets could be identified through further research or through information arising in the planning process.' Again, this reflects policy and ensures that the identified 'locally important buildings' are not the only non-designated heritage assets that might exist.

Table 3 Locally Important Buildings

The Council's Conservation Officer is satisfied that this list broadly reflects the list in the Conservation Area Appraisal, although No. 16 Mill Street is included in the latter but not in the Neighbourhood Plan.

Suggestion: Adding No 16 Mill Street to Table 3 along with the former terrace of farm workers' cottages (now Northbrook Farm/Orchard Cottage) and 5-6 Northbrook. Both these buildings have architectural interest and historic interest owing to their associations with the development of Northbrook hamlet around Stafford Park Farm. It would also be prudent to include locally important buildings in the whole Neighbourhood Plan area, which extends considerably beyond Puddletown village, itself only one part of the whole 'neighbourhood'. In this sense, the policies and descriptions could benefit from a wider gaze to identify what is important and what pressures/opportunities there are in the area as a whole.

Boxed text p.17 The Council's Conservation Officer has suggested re-wording the text in the box.

Suggestion: '...changes that are possible under permitted development rights, subject to any restrictions arising within the Conservation Area or areas subject to current or future Article 4 Directions.'

Policy 5. Design

Dorset Council is supportive of the aims of Policy 5 to ensure development or alterations to existing development "integrate well with the surrounding area and reinforce local distinctiveness". We also welcome the cross reference to table 5 which sets out the principals of good design by element and explains what works well and what doesn't.

Table 5, Building Styles and Materials

The Council's Conservation Officer has suggested that it would be appropriate to insert uPVC as a 'what to avoid here'. This is consistent with HE guidance and concerns over the sustainability of plastic windows which have a relatively low shelf life. According to Historic England, 'replacement plastic windows pose one of the greatest threats to heritage value of historic areas' and they

highlight that their incongruous appearance and character makes them ‘unsuitable for older buildings, particularly in Conservation Areas.’ (Traditional Windows: Their Care, Repair and Upgrading (2015), p. 1)

Suggestion: Insert uPVC as a ‘what to avoid here’ in the Building styles and materials section

Other minor typographical corrections

- Paragraph 2.2.1 typo ‘So it is not appropriate for’
- Paragraph 2.2.3 typo ‘for designation’
- Paragraph 2.3.1 ‘south’ is repeated twice here – Puddletown Forest to ‘south-west’?
- Paragraph 2.5.9 and Policy P2 – Martyrs’ plura
- Paragraph 2.6.1 capitalise Neighbourhood Plan

Chapter 3: The Environment

Policy 6. Wildlife and Natural Habitats:

Dorset Council is supportive of the broad objective of Policy 6 which seeks, where practicable, to enhance biodiversity through an understanding of the wildlife interest that may be affected by development including an understanding of the likely impacts of climate change. It is anticipated that these measures “will protect the existing ecological network and secure an overall biodiversity gain”.

Dorset Council is, however, concerned that the requirements for a Biodiversity Mitigation and Enhancement Plan (BMP) duplicates an existing process already set out in the Dorset Council Validation Checklist (adopted 01-Apr-2019). This checklist gives a summary of the BMP from page 17 and this approach should be followed rather than creating additional validation requirements specific to Puddletown unless there is a clear exception to be made which can be robustly evidenced.

Recommendation: Remove the requirement for a Biodiversity Mitigation and Enhancement Plan to be submitted alongside planning applications. Delete the following text:

“A certified Biodiversity Mitigation and Enhancement Plan will be required where a development would involve:

- the loss of a native hedgerow (in whole or part), area of unimproved grassland, copse / woodland area or mature tree specimen;*
- works within 10 metres of a natural watercourse and its margins;*
- works involving the development of a greenfield site, or a brownfield site in excess of 0.1ha;*
- works involving a rural barn (including barn conversions) or other roof space where bats may be present.”*

Policy 7. European and internationally protected sites

The Plan recognises at paragraph 3.2.8 that “Whilst there are no European designated sites within the parish, there are European designated sites in close proximity (including large areas of land to the east and south of the parish) which could be indirectly affected by development. This includes Poole Harbour (which the River Piddle flows into) and the Dorset heathlands between Bere Regis and Bovington, and at Warmwell and Winfrith.” The Plan explains that “Poole Harbour has been deteriorating due to the increased nitrogen levels from sewage and agricultural practices in the

surrounding area” and “evidence has shown that residents living within 5km of protected heathland will tend to visit the heathland areas leading to increased damage and wildlife disturbance.”

Dorset Council is, therefore, supportive of Policy 7 which seeks to respond to these wider European designations and requires that “Development must avoid having an adverse effect on the integrity of European and internationally important wildlife sites” by cross referencing to the Nitrogen Reduction in Poole Harbour SPD and Dorset Heathlands Planning Framework SPD which set out agreed solutions. Natural England have raised some late concerns with this approach and these are discussed further under Habitats Regulation Assessment.

Paragraph 3.2.9 refers to the requirement for mitigation of impacts on Poole Harbour SAC . For small scale developments mitigation is secured through CIL funds however for larger schemes, mitigation should be provided on site or secured by the developer as part of the development proposal. This sentence should therefore be deleted.

Recommendation: delete reference to Poole Harbour mitigation being achieved through S106 legal agreements.

Policy 8. Flood Risk

Dorset Council is supportive of Policy 8, however, the text within the policy sets out the requirement for and content of a drainage plan to support developments. This wording would be better moved to the supporting text and amended to clearly set out what should be included within any drainage plan.

Recommendation: move requirements and specification for a drainage strategy to accompany developments to the supporting text and amend as follows: “3.3.6 Development proposals must therefore be supported by a Drainage Strategy which assesses, and where feasible and appropriate, incorporates opportunities to reduce the causes and current impacts of flooding. It should also set out measures to monitor and ensure the ongoing maintenance and management of the drainage system, and any remedial measures that may be necessary in the event of a systems failure, both on and off-site. Policy 8. Flood Risk: New development or intensification of existing uses should avoid flood risk from all sources and must incorporate a viable and deliverable drainage system to manage surface water run-off. The future maintenance, upgrade or replacement of flood infrastructure must not be adversely affected by development. The design of any measures included in the drainage plan should take into account the desirability of improving the ecological quality of the River Piddle and Devils Brook.

Policy 9. Noise Assessments

Dorset Council supports the principle of a Noise Assessment policy in the Plan and Map 6 is helpful in showing the approximate areas ‘where road noise may be a concern’. The Council is, however, concerned that the policy as worded does not supply a clear steer in how to determine a planning application, instead focusing on the process requirement for a noise assessments within the mapped area and the standards for mitigation. The current policy text is considered to read better as supporting text and it is instead proposed that the policy is re-worded to specifically state how an application would be determined.

Recommendation: move all current policy 9 text into supporting text. Insert a new paragraph into Policy 9 that states “Noise sensitive development will not be permitted within the area defined ‘as

where noise is a concern' (map 6) without a noise assessment confirming noise is either below a 'significant observed adverse effect level' or can be mitigated through design or layout."

The supporting text or glossary of terms should define 'Significant observed adverse effect level' (SOAEL) as 'The level of noise exposure above which significant adverse effects on health and quality of life occur.' Noise Policy Statement for England (March 2010) notes it is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times.

Suggestion:

Planning practice guidance, Noise, Paragraph: 010 Reference ID: 30-010-20190722 states "For noise sensitive developments, mitigation measures can include avoiding noisy locations in the first place; designing the development to reduce the impact of noise from adjoining activities or the local environment; incorporating noise barriers; and optimising the sound insulation provided by the building envelope."

Paragraph: 011 Reference ID: 30-011-20190722 helpfully continues "Noise impacts may be partially offset if residents have access to one or more design measures" listed.

- a relatively quiet facade (containing windows to habitable rooms) as part of their dwelling;
- a relatively quiet external amenity space for their sole use, (e.g. a garden or balcony). Although the existence of a garden or balcony is generally desirable, the intended benefits will be reduced if this area is exposed to noise levels that result in significant adverse effects;
- a relatively quiet, protected, nearby external amenity space for sole use by a limited group of residents as part of the amenity of their dwellings; and/or
- a relatively quiet, protected, external publically accessible amenity space (e.g. a public park or a local green space designated because of its tranquillity) that is nearby (e.g. within a 5 minute walking distance)."

It may be helpful if these examples are summarised in the supporting text.

[Chapter 4: Housing](#)

Policy 10. The scale and location of new housing development in Puddletown

Housing Need

Dorset Council is supportive of Policy 10 and its proposed housing need of about 7 dwellings per annum which equates to 84 dwellings over the Plan period. It is noted that the supporting text discusses housing need in detail including an assessment of past delivery rates, the adopted local plan spatial strategy, an independently commissioned housing needs assessment (May 2018) prepared by AECOM, the National Policy requirement to "significantly boosting the supply of homes" and more recently the West Dorset, Weymouth & Portland Local Plan Review Preferred Options (October 2018) which sets out a further proposed method to calculating housing need but since superseded.

Dorset Council is working on a new Local Plan for the Dorset Council area which is required by National Policy to consider housing requirements for designated Neighbourhood Areas. However, the new Local Plan is at an early stage and, therefore, the proposed approach set out in the supporting text of the NP is considered suitable. It is also noted that the approach proposed reflects the Adopted Local Plan Policy SUS2 strategy that “Development in rural areas will be directed to the settlements with defined development boundaries, and will take place at an appropriate scale to the size of the settlement.”

Housing Supply

It is noted that in paragraph 4.1.6 that as of September 2019, there were 9 sites which had planning permission for a total of 62 houses (as set out in Table 6) within the Puddletown Area leaving a residual amount of 22 units. The Plan proposes to allocate Land at Athelhampton Road (Policy 12) for 18-22 dwellings and allocate a reserve site at Northbrook Farm (Policy 13) for 10-12 homes. It is also noted that Land at Athelhampton Road has potential for a further phased extension through the review of this plan in 2024 and that windfall development within the defined development boundary can be expected. Dorset Council, therefore, agrees that through these delivery routes sufficient land can be released to meet the calculated housing need.

Paragraph 4.1.7, Policy 10 and Policy 13:

The suggestion of a ‘reserve site’ causes concern. It is difficult to enforce a site as a ‘reserve site’ as once it is identified as being suitable for housing development in a plan, a planning application that meets all of the requirements of the site / policy is likely to be approved. The site should either be allocated in this plan as a development site with a suggestion that it should be developed after the other sites (i.e. an indication of phasing), or the site should be removed from this iteration of the plan and allocated in a subsequent version. Given that this site is intended to provide some small scale employment units, it would seem sensible for this site to be allocated in the current plan to enable employment opportunities in the village.

Recommendation: remove reference to the Northbrook Farm site being a ‘reserve site’.

As the site at Lanes End has been granted consent but not yet developed (WD/D/17/001429), it should be referenced within the plan as such. A policy should be included to allocate this site for development with supporting text setting out the position / quantum of development that has consent.

Recommendation: Include a policy for the consented residential site at Lanes End

Map 7: should identify the significant sites with consent that haven’t yet been built (primarily Lanes End) as it may expire prior to it being built. Dorset Council is happy to work with the Parish Council to prepare clear maps throughout the document showing the relevant allocations.

Recommendation: review and update all maps as appropriate.

Adjustments to the Defined Development Boundary

Paragraph 4.1.9 explains that “Adjustments have been made to the defined development boundary” to include sites with permission or allocated within the Plan (excluding the reserve site). The defined development boundary (DDB) has been removed from protected land such as Local Green Spaces. Similarly Community facilities (such as the schools, the surgery and the pub) which are on the edge of the settlement have similarly been kept outside of the DDB. Finally, much of the area in the

vicinity on The Moor and Backwater which is within the flood plain has also been excluded from the defined development boundary, given the need to avoid development in areas at risk of flooding.

The supporting text to Policy SUS2 within the adopted West Dorset, Weymouth & Portland Local Plan discusses the role of future Neighbourhood Plans. Paragraph 3.3.27 explains “Using neighbourhood development plans and other planning tools, communities can allocate sites, introduce or extend a development boundary, or develop a criteria-based policy to allow development to take place, where they consider this is the right approach for them.” Dorset Council is, therefore, supportive of the proposed extensions to the defined development boundary to take into account recent planning permissions or allocated sites. The Council is, however, concerned at the scale of the revisions to the DDB to exclude certain areas including community facilities and areas at risk of flooding although we recognise the specific justifications. The DDB is a well understood planning tool and works in tandem with other policies in the ‘Local Plan’. For example national and local policy and seeks to prevent inappropriate forms of development in areas at risk of flooding and there is no need to re-draw the DDB for national and local policy to remain effective in this regard.

Recommendation: The proposed DDB should be more closely aligned to the existing DDB in the Local Plan. For example, *the DDB should be re-drawn to include areas at risk of flooding.*

Policy 11. House types

Dorset Council is supportive of the aim of Policy 11 to locally define the type and size of housing that should be permitted. The overall presentation of the policy is, however, considered confusing for the Plan user as it jumps between tenures, sizes and thresholds with little explanation. Given there are only two allocations this policy seems overly burdensome.

Criterion 1, bullet point 1 seeks at least 30% of major housing sites to be affordable 1 or 2 bedroom dwellings. Bullet point 2 seeks at least 1 home or 5% to be affordable home ownership on major sites. In contrast Policy HOUS1 of the Adopted Local Plan seeks 35% in West Dorset split 70% social / affordable rent and a maximum of 30% intermediate affordable housing.

Criterion 1, bullet point 3 seeks one, two or three bedroom open market homes. Criterion 2 suggest that “As a result, on sites that can accommodate two or more dwellings, larger homes (with capacity for 4 or more bedrooms) should be limited to no more than a single unit (or not exceed 20% of the open market mix on sites of five or more homes)” which appears to conflict with criterion 1, bullet point 3.

Dorset Council welcomes criterion 3 which recognises that “The mix of house types may be varied if there is clear evidence that site specific constraints or viability would otherwise prohibit development.”

Bullet point 4 seeks homes specifically designed for residents with more limited mobility and/or requiring an element of care. Dorset Council is unsure if this refers to any specific National Standards.

‘Local People’ and ‘Local Connection’:

Although it is appropriate to include a local connection test within the neighbourhood plan, the wording as included in the submission draft of the Puddletown Neighbourhood plan is not appropriate. The use of the phrase “born and raised in the community” is likely to cause problems and possibly result in consequences that were not intended. A local connection typically relates to a

work connection, a family link or to someone who has lived or worked in the parish for at least the last two years or three of the last five. Currently the test as worded would exclude a wide range of people including key workers.

Dorset Council has an emerging local connection test as set out in the Council's Draft Housing Allocations Policy (March 2020). In order to avoid duplication and confusion between processes it is recommended that the Council's local connection test is instead referenced.

Recommendation: Reference should be made to the Dorset Council's emerging Local Connection Test.

Site Allocation process

The Council's Conservation Officer has made the following general comments in relation to the site allocations but addresses each site specifically as detailed below:

"I have some concerns that the baseline heritage information for the proposed sites, as outlined in the SEA (Dec 2018), does not seem to be particularly extensive, though this relates especially pertinent to Site 1. Whilst the policies refer to, for example, respecting setting/character etc., there is no indication that this has been assessed, but the site allocations imply that some development will occur. This might well be the case, but the site should only be allocated on the basis of at least some assessment of significance of the affected heritage assets and the impacts upon them – sufficient at least to understand and justify the principle – rather than leave this to the planning application stage, by which point the site's very allocation will be taken as some measure of support for development. I note the 'Heritage Impact' comments on pp. 55 and 59 of the Consultation Report (May 2020), but these concentrate on specific outcomes and do not necessarily address 'significance' of affected elements.

Some of the issues this raises are perhaps illustrated by our observations below, which highlight some tension between the site allocations and the provisions of the NP Policies and, indeed, national/local policies referring to assessing the significance of, and minimising harm to, heritage assets. There is also some possible tension between the site allocations and the aim of Policy 3 which is to support 'the piecemeal, organic nature of development (and resisting large-scale estate-type developments)' (p. 14). It is difficult to envisage a development of 18-22 dwellings which would not conform to the latter description."

The Council's Conservation Officer suggests that wording is added to Policies 12 and 13 as detailed below

Policy 12 Housing and community uses site allocation: land at Athelhampton Road

Dorset Council is supportive of the site search process and the Plan's conclusion for green field release with Land at Athlehampton Road being considered the most sustainable site.

It is noted that criteria a) seeks at least 35% affordable housing, however, Policy 11 seeks at least 30% affordable homes (1 and 2 bedrooms) with an additional 5% either starter homes, self-build or shared-ownership. Therefore, it would appear that Policy 12 is not currently compliant with Policy 11.

Recommendation: Criteria a) is amended to say “The type and size of dwellings accords with Policy 11, with at least 30% affordable homes for rent and 5% starter, self-build or shared-ownership affordable homes”

Policy 12, criterion c). The Council’s Infrastructure Service has commented in relation to the allocated site “Site 1: Access from Athelhampton Road appears achievable – suitable spacing from Milom Lane will need to be provided.”

The Conservation Officer has made specific comments in relation to land at Athelhampton Road
“Policy 12, p. 41: section f) should include ‘Conservation Area’ under the list of elements whose settings need to be respected.

I am aware of the comments made by another Conservation Officer in April/May 2020, as summarised in pp. 52-56 of the Consultation Report, although I retain concerns about the suitability of this site, particularly in relation to a number of elements identified in the Conservation Area Appraisal [CAA] and the NP itself. I offer the following comments:

- *First I draw attention to my comments above regarding Policy 12 and including ‘setting of the Conservation Area’ as a constraint.*
- *The CAA identifies a number of ‘key points of quality’ which contribute to the character and appearance of the Conservation Area, including*
 - o *‘good clean edges to the settlement to the north, NE and east’;*
 - o *‘related to this, well defined entry points, particularly from the west and east, on the former A35’ – this point is highlighted in Table 2 (p. 15) of the NP;*
- *The CAA also states that ‘the village edges are blessed with a number of fine, mature trees, at Ilsington House (seen to particular advantage along Athelhampton Road [emphasis added] and The Green...’ – again, this point is highlighted in the NP (2.3.3., p. 11).*
- *The CAA also identifies the hedgerow fronting the site as an ‘important hedgerow’; that ‘the village has a very definite nucleated plan form’ (p. 14); is ‘reasonably compact’ (p. 15); and the traversal of the CA ‘characterises a representative mixture of spaces, landmarks, views and sensations of relative enclosure and exposure: the elements of townscape’ (p. 15).*
- *As the above points illustrate, any development on the site will directly impact upon key qualities of the Conservation Area and therefore would require some initial substantiation and justification for the principle to be acceptable.”*

As detailed above the Conservation Officer has suggested that this additional wording be added to the policy suggesting:

“A comprehensive heritage strategy is agreed with the Local Planning Authority, in accordance with Policy 4, that

- *assesses the significance of all heritage assets potentially affected by the development, including any contribution made by their setting;*
- *demonstrates how significance will be taken into account in the design process, i.e. how harm to heritage assets has been avoided or minimised; and*
- *identifies any opportunities to enhance or better reveal the significance of any heritage assets.”*

Recommendation: additional wording is added to Policy 12 in accordance with the Conservation Officer’s comments.

Policy 13. Reserve site allocation: Northbrook Farm

Further to the earlier comments made to Paragraph 4.1.7, Policy 10, Dorset Council recommends the site allocation is included in the Plan rather than when the Plan is reviewed. This has the added advantage of offering choice and competition in the market.

Recommendation: remove references to this site being a reserve site.

Dorset Council is supportive of several of the cross references to other relevant policies in the Plan including a bat and barn owl survey (Policies 6 & 7), Noise Assessment (Policy 9) and Drainage Plan (Policy 8).

We continue to express concern with the Criterion F) as set out in our comments within Policy 12

Recommendation: Criteria f) is amended to say “The type and size of dwellings accords with Policy 11, with at least 30% affordable homes for rent and 5% starter, self-build or shared-ownership affordable homes”

The Council’s Conservation Officer has made the following comments in relation to the reserve site:

“As a contained, developed site slightly removed from the CA boundary and the village core, the site here certainly appears to have some potential and again I note the comments of the Conservation Officer.

However, again the site assessment could have benefited from a more detailed assessment of significance, which could have assisted a judgement as to whether any or all of the buildings are curtilage-listed. The relationship of the farm to the village and the CA would also have been beneficial to assess the suitability of the site, as well as the potential impacts on the setting of Stafford Park Farm and the water meadows identified on the Dorset HER. Moreover, the NP itself highlights the ‘close connection/intervisibility’ with the water meadows and indeed includes related provisions in Policy 3.

It would be more helpful to highlight these issues as constraints in the policy based on a sound understanding of significance, rather than wait for an application to come forward. In addition, the removal of the stables from the site allocation (owing to its poor condition and ‘so that its early conversion and repair can be progressed’) possibly affects the integrity of the overall vision for the site.”

The Conservation Officer has again suggested that additional wording be added to the policy

'A comprehensive heritage strategy is agreed with the Local Planning Authority, in accordance with Policy 4, that

- *assesses the significance of all heritage assets potentially affected by the development, including any contribution made by their setting;*
- *demonstrates how significance will be taken into account in the design process, i.e. how harm to heritage assets has been avoided or minimised; and*
- *identifies any opportunities to enhance or better reveal the significance of any heritage assets.*

Recommendation: additional wording is added to Policy 13 in accordance with the Conservation Officer's comments.

Dorset Council's Infrastructure Service has also commented in relation to this proposed site:

"Site 8: Northbrook Farm – Access via the Long Lane onto The Moor may be achievable. A new access direct onto The Moor may not be achievable given the nature of the highway in this vicinity. Footway improvement/linkage to Puddletown would be required."

Chapter 5: Community facilities and other infrastructure

Policy 14. Supporting Community Facilities and Local Services

Dorset Council is supportive of Policy 14 and its aim for "development proposals to improve the provision of community facilities (including those listed below) in a manner in keeping with the character of the area". Eleven sites are listed in the policy and depicted on the policy map allowing for easy identification.

Paragraph 5.1.1 makes reference to the "lower" school whereas elsewhere the school is described as the "first school". The correct term is "first school".

Recommendation: amend the text to refer to the first and middle schools.

Table 7 Community infrastructure –identified needs

Suggestion: for clarity of presentation, it seems as though the text in Table 7 should not be in a box.

Chapter 6: Business, employment and tourism

Dorset Council notes that no specific policies or site allocations for new employment workspace or additional visitor facilities have been included in this plan.

Paragraph 6.1.6 does not fully reflect the Local Plan policy on large scale tourist accommodation.

Recommendation: add text: "but with a focus for large scale tourist accommodation to be within town centres" at the end of the first sentence

Chapter 7: Transport and traffic

Policy 15. Creating safer roads and pedestrian / cycle routes

Dorset Council is supportive of the policy aim to create safer roads and pedestrian / cycle routes and welcomes the cross reference to Table 8 Traffic Management Proposals and policy map identifying the pedestrian route connections.

The last paragraph of this policy looks to manage construction traffic associated with large scale developments. A planning condition is normally attached to large developments to manage construction traffic. The proposed approach is therefore not necessary.

Recommendation: Delete the last sentence of Policy 15.

Map 8 Quiet lanes and connections and large vehicle routes

It is very difficult to see the difference between the existing and proposed quiet lanes connection as they are in similar colours.

Suggestion: One of the colours be changed so they can be more easily differentiated.

Table 8 it should be noted that many traffic matters fall outside the scope of planning; for example changes to traffic management on existing transport networks are usually for the Highways Authority to deal with. Changes to traffic lights, speed limits, signage, and traffic circulation, crossing points and other traffic management devices usually fall outside the scope of Neighbourhood Plans. These restrictions do not however apply to the spending of CIL which can be used to deliver some of the suggestions in Table 8.

Suggestion: Table 8 should be renamed Traffic Management Suggestions.

Policy 16. Parking Provision

Dorset Council understands the sentiment behind Policy 16 which seeks to maximise car parking provision in a rural location with few other practical transport opportunities. However, the Council would stress that the County Parking Standards remain the agreed standards for determining planning applications. Local Plan Policy COM9 Parking Standards in New Development explains “parking provision should be assessed under the methodology set out in the Bournemouth, Poole & Dorset Residential Study (or its replacement)” taking into account factors such as the level of accessibility. We are not aware of any local evidence that would compel an applicant to exceed these agreed standards.

Recommendation: The first paragraph is amended to read “Parking provision should meet county parking standards.”

Appendices

It is noted that there are a large number of appendices associated with the Neighbourhood Plan. It may be more appropriate that some of these (Appendix 5 & 6) are supporting documents rather than as part of the Neighbourhood Plan.

Habitats Regulation Assessment - Appropriate Assessment

Natural England were consulted on the Appropriate Assessment for the Puddletown Neighbourhood Plan in February 2020. In their response in April 2020, Natural England explained that they would respond to the consultation on the Appropriate Assessment for the Puddletown Neighbourhood

Plan in more detail once they had reviewed the 'strategic nitrogen budget'. Natural England were concerned about the lack of evidence regarding the delivery of mitigation against the impacts of elevated concentrations of nitrates in the Poole Harbour European Site from new development within the Poole Harbour hydrological catchment.¹

Since this time, Natural England have reviewed a draft of the monitoring report for the Nitrogen Reduction in Poole Harbour SPD. Whilst the monitoring report shows that sufficient mitigation has been provided for the period 2017-19, Natural England have raised concerns about the backlog of mitigation from permitted but not yet completed schemes and have suggested that future development may be required meet the nitrogen offsetting requirements prior to occupation. Natural England have recommended, in their response to the Neighbourhood Plan consultation, that the wording of Policy 7 is amended to ensure that development cannot commence until sufficient nitrogen offsetting measures has been delivered.

They have suggested this wording to be added to policy 7:

“Development will be required to confirm the nitrogen budget and set out specific and appropriately located mitigation measures that would be implemented in order to ensure that development is nutrient neutral from the start of its operational phase. Such mitigation measures must be secured for the duration of the development's effects. A financial contribution to strategic mitigation measures may be an appropriate alternative to direct provision of mitigation. In this case it will be necessary to liaise with Dorset Council and Natural England to confirm an appropriate mitigation scheme to which the contributions will be directed and to ensure any contributions are sufficient to fully mitigate the impacts of the development on the Poole Harbour internationally designated sites”.

Recommendation: Dorset Council suggests that these changes are made to Policy 7 so that impacts are avoided.

Additional comments

Natural England have also suggested that the neighbourhood plan may attempt to deliver the necessary level of mitigation for the allocated development within the plan through the provision of permanent land use change within the Neighbourhood Plan area. This might be achieved by the NP allocating additional agricultural land for land uses with a low nutrient status that will also be of benefit to the local community and/or biodiversity interests (eg community woodland, community orchards, nature reserve, new wetlands, or other similar green infrastructure including SANG).

Achieving nitrogen mitigation on a neighbourhood plan scale is considered an aspiration rather than a requirement, as the Nitrogen Reduction in Poole Harbour SPD requires nitrogen neutrality to be achieved on a catchment scale where there are considered to be greater opportunities for the delivery of nitrogen mitigation.

Covid-19

The Neighbourhood Planning (General) Regulations 2012 require *“neighbourhood planning groups and local planning authorities to undertake publicity in a manner that is likely to bring it to the*

¹ Further information on the issue of nitrates in Poole Harbour is presented in the adopted Nitrogen Reduction in Poole Harbour Supplementary Planning Document (SPD).

attention of people who live, work or carry on business in the neighbourhood area. The regulations also stipulate that it is important “all groups in the community have been sufficiently engaged, such as with those without internet access, more targeted methods may be needed including by telephone or in writing.”

There are also requirements in the Neighbourhood Planning (General) Regulations 2012 that require *“neighbourhood planning groups and local planning authorities to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected. It is not mandatory for copies of documents to be made available at a physical location. They may be held available online.”*

In response to the pandemic, the regulation 16 consultation was carried out in unusual circumstances. In order to follow government guidance, and Dorset Council’s own health and safety advice, no hard copies of the plan were made available in the Council’s offices or local libraries. Consequently, there was a greater emphasis on the consultation being held online. However, Dorset Council did notify neighbours, adjacent to the proposed housing allocation sites, about the consultation by letter. The Parish Council also undertook a greater amount of local advertisement (including posting details of the consultation on the community facebook page and putting up posters and notices). Therefore, Dorset Council is satisfied that in these unusual circumstances publicity was carried out in a “manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.