



PUDDLETOWN NEIGHBOURHOOD PLAN

Regulation 16 Consultation 26 June-7 August 2020

Response Form

The proposed Puddletown Neighbourhood Plan 2019 to 2031 has been submitted to Dorset Council for examination. The neighbourhood plan and all supporting documentation can be viewed on Dorset Council's website:

<https://www.dorsetcouncil.gov.uk/puddletown-neighbourhood-plan>

Please return completed forms to:

Email: planningpolicy@dorsetcouncil.gov.uk

Post: Planning Policy, South Walks House, South Walks Road, Dorchester, DT1 1UZ

Deadline: **End of Friday 7th August 2020.** Representations received after this date will not be accepted.

Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule and privacy policy (www.dorsetcouncil.gov.uk/privacypolicy). Your data will be destroyed when the plan becomes redundant.

	Personal Details *	Agent's Details *
Title		Mr
First Name		Paul
Last Name		Willis

Job Title(if relevant)		Head of Planning
Organisation (if relevant)		Feniton Park Ltd
Address		██████████ ██████████ ██████
Postcode		██████████
Tel. No.		██████████ ██████████
Email Address		████████████████████

**If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.*

Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input type="checkbox"/>	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:- 0

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	4. Housing, 5. Community Facilities
Policy	12, 13, 14

Page	35(Map 7), 39, 40, 42, 43, 47
Appendix	6

3. Do you wish to? *Please tick one box only.*

	Support
<input type="checkbox"/>	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

General

Feniton Park Limited's initial concern is that there was no opportunity offered to discuss its proposals for the residential / community development of land at Rod Hill Lane beyond the 3 day design forum that took place over 2 1/2 years ago in September 2017. A number of misassumptions and inaccuracies which have now been perpetuated in the Plan could have been clarified and removed had further discussions taken place.

This clearly was not the case with the two sites that have been put forward in the Plan for residential development at Chapel Ground (now Land at Athelhampton Road) and Northbrook Farm. Indeed the minutes of the meeting of the Puddletown Neighbourhood Plan Steering Group on 9th September 2019 record that "Members agreed to write to landowners at two of the sites requesting information before a final decision is made". It appears that the landowners / developers of these sites have been afforded the opportunity to clarify, amplify and improve their proposals and offer outside of the formal process. It is disappointing that this opportunity was not extended to Feniton Park Limited.

Housing Location (Policy 10)

Feniton Park Limited disagree with the location of housing at Land at Athelhampton Road for 18- 22 dwellings and community uses (Policy 12) and with the reserve site allocation for up to 12 dwellings at Northbrook Farm (Policy 13). It is considered that land at Rod Hill Lane is much better suited for housing and community development.

Land at Athelhampton Road (Policy 12) is unsuitable for the following reasons:

1. The site is divorced from the existing development boundary and represents largely linear ribbon development alongside Athelhampton Road at the very eastern extremity of the village. It will extend development some 365 metres beyond the existing development boundary into open countryside. The Site Assessment Report produced by AECOM 2018 states in Appendix A that the site is adjacent to and connected with the existing built up area. This is factually incorrect and should have been designated as being 'outside the existing built up area'. The nearest part of the site lies some 65 metres beyond the existing development boundary.
2. The site is highly visible from the Athelhampton Road on the eastern approach to and exit from the village. The Site Assessment Report produced by AECOM 2018 states in Appendix A "However the site is highly visible on the eastern approach to Puddletown. Additionally, the northern half of the site is likely to be visible from the town itself." Development of the site would also impact on the setting of, and views from the Puddletown, Stinsford and Lower Bockhampton and Tolpuddle Conservation Area. The site borders a much greater proportion of the Puddletown Conservation Area along the Athelhampton Road than the Rod Hill Lane site. The site is classified as being

of medium sensitivity to development.

3. The site is located in close proximity to Little Knoll Copse, which is an area of Deciduous Woodland Biodiversity Action Plan Priority Habitat, and is also an ancient woodland. Disturbance may take place from new development at this location from noise, light pollution or trampling from enhanced access (AECOM 2018 Para 4.4).
4. The development will adversely affect the setting and context of three architecturally important buildings on the Athelhampton Road frontage and the amenity of the residents.
5. Land within the northern section of the site is within a groundwater flood warning area. As such the Plan recognises in Para 4.3.7 that “there have been localised flooding problems...which will need to be resolved and measures included to ensure any surface water run-off would remain below existing levels”. These measures increase the site development costs and therefore reduce the level of affordable housing that can be offered.
6. A new high standard access will be required into the site from Athelhampton Road which will further serve to reinforce the linear urbanisation of the eastern approach to the village. In addition the high cost of such a junction reduces the level of affordable housing that can be offered as part of the development.
7. This site is one of the furthest from the existing services and facilities in the village. At its eastern extremity it is some 180 metres further than the most eastern boundary of the Rod Hill site. The Athelhampton Road site is therefore less likely to succeed in meeting the SEA objective ‘Promote sustainable transport use and reduce the need to travel’.
8. Contrary to the recommendations of FERIA Urbanism resulting from the September 2017 Design Forum, no separate pedestrian cycle link is proposed linking to St Mary’s Middle School. This link can be provided through the Rod Hill Lane site providing a safe and sustainable transport route thereby reducing the need for car based journeys. It will assist in setting sustainable travel habits in young people which can last a life time.

Northbrook Farm (Policy 13) is unsuitable as a reserve housing site for the following reasons:

1. The site is divorced from the existing development boundary being some 130 metres from the boundary. It is therefore correctly categorised by AECOM as being ‘outside the development boundary’
2. This site is the furthest from the existing services and facilities in the village. The Northbrook Farm site is therefore least likely of all the sites to succeed in meeting the SEA objective ‘Promote sustainable transport use and reduce the need to travel’.

3. The Site Assessment Report produced by AECOM 2018 states at Para 4.49 “Due to the site’s immediate proximity to the A35 and the A354 junction, the site suffers significantly from noise pollution issues”.
4. AECOM recommends “Given noise pollution issues, and the relative distance of the services and facilities or Puddletown Village centre, the site is not appropriate for a housing led-development” (Para 4.53) And yet this site is allocated as a reserve housing site?

The **site at Rod Hill Lane** should be allocated for housing development in Policy 12 for the following reasons:

1. The site abuts the existing development boundary. The landowner owns Rod Hill Lane. Appendix A to the Site Assessment Report (AECOM 2018) identifies the site as being adjacent to and connected with the existing built up area. This is not the case with either Land at Athelhampton Road or Northbrook Farm. Therefore as noted in Appendix 6 of the draft Neighbourhood Plan “The development would not significantly extend the village beyond its current limits or impact on existing residents”. This cannot be said of Land at Athelhampton Road or Northbrook Farm.
2. Both the Rod Hill Lane site and Land at Athelhampton Road are assessed identically in landscape terms by AECOM 2018 being “medium sensitivity to development”. In both cases the northern parts of the sites are considered to be less sensitive in landscape and village-scape terms. However, with respect to Rod Hill AECOM comment that there are “short views into the site due to screening from hedgerows and the Doctors Surgery”. On site planting on the lower (southern) part of the site would further reduce any visual impact. Land at Athelhampton Road has a significantly greater visual impact (long views) on the approach to and exit from the village.
3. The site is the significantly closer to the village centre and existing facilities and services than either Land at Athelhampton Road or Northbrook Farm. It is therefore the most likely of the three sites to succeed in meeting the SEA objective ‘Promote sustainable transport use and reduce the need to travel’.
4. There are no access constraints. The site can be easily and safely accessed from Athelhampton Road using a short extension of the existing access to the Doctors Surgery via Rod Hill Lane. This situation was presented to the Neighbourhood Plan Steering Group at the Design Forum in September 2017. Confirmation that Dorset Council as Highway Authority is content that the access is suitable for far in excess of 22 dwellings is contained in the following e-mail dated 18th December 2019 (original supplied).

"Dear Mr Willis,

Thank you for your recent enquiry regarding a potential development site for up to 120 houses, adjacent to Athelhampton Road, Puddletown.

It is my understanding that you previously met with Ian Madgwick, a Senior Engineer in my Team, on 17 August 2017 and that Mr Madgwick indicated that vehicular and pedestrian access could safely be gained from Rodhill Lane (a private road). I can inform you that Ian will be leaving Dorset Council on 24 December 2019 and is currently on annual leave until that date.

As requested, I have carried out a desktop analysis of the site and can confirm that the Highway Authority can accept your development site being served off the private road (Rodhill Lane), just to the west of the surgery. This road is a designated bridleway which appears to have adequate visibility at its junction with Athelhampton Road (the C34). The existing carriageway that runs south to your site scales at 5m, which is the minimum that we'd accept for a two-way traffic flow. Your development would need to ensure that the service margin to the west of the road is maintained and that a 2m wide footway link be provided to the main road. I'm prepared to accept a single access route to the site with no need for an alternative emergency access provision.

*If you have any further enquiries, please don't hesitate to contact me.
Yours sincerely*

*Steve Savage
Transport Development Manager
Infrastructure Service*

[Redacted signature block]

Therefore the Highway Authority do not agree with the Neighbourhood Plan which states in Appendix 6 that "The site would have to be accessed off Milom Lane, which would urbanise the character of the Lane". Neither do the Highway Authority agree with AECOM 2018 who state in Appendix A that "Access into the northern section of the site is more suitable, but is potentially constrained by the Doctors Surgery and highway safety concerns at the junction between Milom Lane and Athelhampton Road". The Highway Authority has expressed no concerns about the suitability of Rod Hill Lane to access the development nor has it raised road safety concerns on the surrounding highway network.

5. In addition a safe and sustainable pedestrian and cycle route can be provided across the site to the middle school. The Neighbourhood Plan recognises this in Appendix 6 where it comments "it potentially provides an opportunity to negotiate a pedestrian link around the southern edge of the village (as the

land is in the same ownership) but this would need to navigate across the sunken Green Lane and could prove costly (and may not be feasible).” Of more concern is that the Strategic Environmental Assessment Report commented positively on the potential route saying “the Rod Hill Lane alternative potentially could help secure an alternative route to the south-west linking to the school” but then disregards its significance by adding “however the feasibility of this needs further investigation and therefore this has not been included in the score”. It seems perverse and unfair that Feniton Park Limited was not invited to provide further information to substantiate their ability to deliver such a key piece of sustainable infrastructure and the Rod Hill Lane site has been scored down as a result.

6. The site could provide appropriate community facilities / allotments / public open space as suggested by the community. This was offered by Feniton Park Limited at the Design Forum in September 2017. Sadly we were not afforded an opportunity to engage with the Neighbourhood Plan Steering Group or community to expand on our offer. This is recognised in the Strategic Environmental Assessment 2019 where it states (page 19) “The Chapel Ground site allocation includes land for a community facility in addition to public open space and the provision of allotments. Whilst the Rod Hill Lane alternative could potentially also accommodate a community facility there is less clarity on this point”. Again it appears that the Rod Hill site has been scored down because of not being afforded the same opportunity as other sites to engage and clarify our offer.

Conclusion

In paragraph 4.3.3 of the Neighbourhood Plan it is recognised that “the different pro’s and con’s between the site options means there is no clear ‘front runner’ and the choice of site allocations considered all the factors and issues identified”. Given that the choice is difficult between the option sites and it’s a ‘close run thing’ then accurate and full information about the pros and cons of the sites is essential. Sadly the assessment process has not been properly informed and this has been to the detriment of the Rod Hill Lane site.

The incorrect representation of highway access as being unsafe and environmentally damaging, the lack of any description and credit for the offer of community facilities and open space, the failure to properly explore and score the potential of a dedicated pedestrian/cycle link through the site to the school and wider village and the overlay of the landscape impacts of the northern part of the Rod Hill Site when compared to Land at Athelhampton Road have led the site being excluded from the Plan.

In summary the Rod Hill Lane site should be allocated for 18 - 22 dwellings and community facilities in the Puddletown Neighbourhood Plan because:

- It abuts the existing development boundary
- The northern part of the site on which development would take place has localised landscape impacts that can be mitigated

- It is the most sustainable site in transport terms being closest to the village centre and services and facilities thereby reducing reliance on the private car
- It would utilise an existing access which has the approval of Dorset Council in its role as Highway Authority as being suitable and safe.
- It can provide a safe pedestrian / cycle route across the site linking to the middle school and wider village
- It would provide community facilities, allotments and public open space in consultation with the community

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Housing Allocations Policies

Delete - Policy 12: Housing and Community Uses Site Allocation: Land at Athelhampton Road.

Delete – Policy 13: Reserve site allocation: Northbrook Farm

Add – Policy 12: Housing and Community Uses Site Allocation: Land at Rod Hill Lane.

Land at Rod Hill Lane, as shown on the Policies Map, is allocated as a site for housing for about 18-22 dwellings and community uses.

Map 7. Revised defined development boundary and site allocations.

Delete – Housing and Community: Site at Athelhampton Road

Delete – Housing Reserve Site: Site at Northbrook Farm

Add – Housing and Community: Site at Rod Hill Lane

Policy 14. Supporting Community Facilities and Local Services

Delete – c) A new community facility, public open space and allotments in association with development of Land at Athelhampton Road (under Policy 12).

Delete – d) Land (public open space) for informal recreation to the south of Northbrook Farm, to be provided in association with that development (under Policy 13).

Add - c) A new community facility, public open space and allotments in association with development of Land at Rod Hill Lane (under Policy 12).

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

	Yes
	No

Signature: Paul Willis _____
If submitting the form electronically, no signature is required.

Date: 04/08/2020