



# CHICKERELL NEIGHBOURHOOD PLAN

Regulation 16 Consultation

## Response Form

The proposed Chickerell Neighbourhood Plan 2019 to 2036 has been submitted to Dorset Council for examination. The neighbourhood plan and all supporting documentation can be viewed on Dorset Council's website: [www.dorsetcouncil.gov.uk/chickerell-neighbourhood-plan](http://www.dorsetcouncil.gov.uk/chickerell-neighbourhood-plan)

### Please return completed forms to:

Email: [planningpolicy@dorsetcouncil.gov.uk](mailto:planningpolicy@dorsetcouncil.gov.uk)

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

**Deadline: Friday 16 October 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**.

*\*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.*

	Personal Details	Agent's Details *
Title	Mr	Mrs
First Name	Daniel	Louise
Last Name	Ramirez	Follett
Job Title (if relevant)		Principal Planner
Organisation (if relevant)	Persimmon Homes South Coast	Pegasus Group
Address		██████████ ████████████████████ ██████████ ██████████
Postcode		██████████
Tel. No.		██████████

Email Address		
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## Part B – Representation

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

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

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	7 – Wyke Regis
Policy	CNP8
Page	21 and 22
Appendix	

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

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

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

Pegasus Group are instructed to submit representations to the submission Chickerell Neighbourhood Plan (May 2020) (CNP) on behalf of Persimmon Homes South Coast with regard to the site known as the 'Former Tented Camp' which is located to the south of Mandeville Road at Wyke Regis, within the Chickerell Neighbourhood Plan Area.

The policies of the Chickerell Neighbourhood Plan will become part of the adopted development plan once the neighbourhood plan is made in conjunction with the currently adopted West Dorset, Weymouth and Portland Local Plan (Oct 2015).

Paragraph 7.4 of the CNP states that the former West Dorset Council had proposed limited development of the site in their 2018 Preferred Options consultation and that previously it had been considered as a traveller site.

The CNP states at p. 21 that the site is "*not actively being promoted through this Neighbourhood Plan (in the absence of any identified local need), in light of the adjacent warehouse site being*

*developed for housing, it is accepted that the site is probably suitable for some limited residential development."*

Paragraph 7.4 of the CNP continues;

*"If accepted through the Dorset Local Plan, the Town Council will ask that any development in this location should be limited to a single line of housing fronting the road between the existing properties and the Value House development. This would ensure the wildlife inhabiting the Fleet side of the site (e.g. wintering Short-eared Owls) are afforded some protection by restricting access, and that development does not impinge into the wildlife corridor linking through to Little Francis. As this site will be viewed from the South West Coast Path any development should be appropriate to that setting, for example, Fleet historic coast guard cottage style and not flat roofed square blocks."*

Our clients object to the CNP approach to this site which is not based in evidence and request that the site be allocated for residential development in the CNP for the following reasons;

#### Housing Need

- The CNP states at paragraph 3.2 that it has been written to cover the period from April 2019 to March 2036.
- The existing adopted Local Plan, the West Dorset, Weymouth and Portland Local Plan has a plan period until 2031.
- The allocations in the adopted local plan were made to meet housing need until 2031 not 2036 – as currently written the CNP does not account for 5 years of local housing need.
- The CNP should be written to be in general conformity with the strategic policies of the adopted local plan in order to meet the basic conditions test of the planning practice guidance<sup>1</sup>.
- The adopted West Dorset Weymouth and Portland Local Plan (2015) has a plan period until 2031, however in order to not require immediate review after the adoption of the new emerging Dorset Local Plan which will cover the period until at least 2038<sup>2</sup>, the CNP could allocate additional development sites to meet emerging local needs.
- The Government has recently consulted on changes to the Standard Method for calculating local housing need, and the Housing White Paper has consulted on the Government providing housing need figures directly to Council's having taken local constraints into consideration.
- It is clear that the Government is ambitious with regard to its aspirations to deliver 300,000 new homes nationally per annum.
- Initial calculations for Dorset Council based on the Governments consultation methodology for changes to the standard method indicate that the Council will need to provide over 285 dwellings per annum more than would be required by the current standard method in the NPPF (2019).
- It is clear therefore that additional housing sites will be required across the authority moving forward, including within the CNP area.

#### Previously Developed Land

- The Tented Camp site comprises previously developed land meeting the definition in the glossary in the NPPF (2019);  
" **Previously developed land:** Land which is or was occupied by a permanent structure,

<sup>1</sup> <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>  
Paragraph: 065 Reference ID: 41-065-20140306 Revision date: 06 03 2014

<sup>2</sup> <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/evidence/dorset-council-lds-september-2020.pdf>

*including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."*

- The National Planning Policy Framework NPPF (2019) is clear at Section 11 that planning policies should make the best use of land. Paragraph 118c) states that planning policies should;  
*" give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land"*
- The former West Dorset, Weymouth and Portland Council consulted on the Tented Camp as a draft allocation in the 2018 Preferred Options consultation for approximately 30 new homes.
- The Chickerell Background Paper for the Preferred Options consultation (August 2018) (attached at Appendix 1) states with regard to Wyke Regis that there is ;  
*"Potential for small scale development adjacent to built up area. Impact on Heritage Coast needs to be given consideration."*
- Section 10.2 of the Chickerell background paper for the Preferred Options consultation (August 2018) identifies the site (CH3) as a preferred option for development stating that;  
*" This development option is a brownfield site known as the former Tented Camp at Mandeville Road. The option came forward during the Issues and Options consultation. The site is in close proximity to the Chesil and the Fleet SSSI and Heritage Coast. However, redevelopment offers an opportunity to improve the character of the area leading to landscape benefits and an enhancement to the Heritage Coast designated area."*
- Further analysis of the site is provided at paragraphs 10.16 – 10.19 of the background paper which states that the site would be suitable for approximately 30 new homes. A draft Policy CHIC5 was provided; Table 10.5 stated the mitigation measures the Council considered necessary and an indicative layout/concept plan was provided at paragraph 10.22.
  
- It is quite clear therefore, that West Dorset, Weymouth and Portland Council considered the site suitable for development, not only to assist in meeting housing need, including affordable housing, but also in terms of securing enhancements to the special character of the Heritage Coast by providing informal public open space, footpath connectivity and biodiversity enhancements.
  
- The site has also been promoted to Dorset Council and included in the 2020 SHELAA (Site ref: LA/CHIC/011) and considered suitable for development, acknowledging that redevelopment could offer an opportunity to improve the character of the area leading to landscape/environmental benefits and an enhancement to the designated Heritage Coast. Studies undertaken by Persimmon to support the promotion of the site consider that a greater number of new homes can be accommodated with appropriate mitigation and without resulting in adverse impacts on ecology and landscape.
  
- Given the emerging draft allocation prior to local Government re-organisation in Dorset our clients have continued to undertake further detailed evidence base studies which in turn have informed the production of a comprehensive Site Deliverability Statement which is attached at Appendix 2. This document demonstrates that the site can deliver approximately 130 new homes while retaining substantial areas for open space and recreational purposes

and a green gap for wildlife corridor connectivity across the northern and western part of the site.

- Such a scheme will assist in meeting new housing need arising from changes to the Standard Method, including new affordable homes, it will bring environmental enhancements to this part of the heritage coast and will provide enhanced public open space provision in perpetuity for the existing community.
- The site is suitable, available and deliverable and owing to its size and the fact that it does not require extensive new infrastructure to deliver, can also contribute to the Council's five-year housing land supply.

#### Ecology

- The site specific Ecology report submitted with these representations does not identify Short Eared Owls as using the site, contrary to the findings and text of the CNP.
- The site will not impinge on the Wyke Regis wildlife corridor adjoining the western boundary of the site as the site proposals include a large area of public open space adjacent to the wildlife corridor which could be used to expand or enhance the corridor.
- It is considered that Policy CNP8 as currently written is not positively prepared. It is suggested that the wording should be amended to read "*Development that would enhance....would be supported*".

#### Design

- The Site Deliverability Statement provides the design rationale for our client's proposals for the site, including the fact that development has been concentrated to the eastern edge of the site in order to preserve the gap between any new built development and the Value House site to ensure green infrastructure connectivity is maintained for ecological purposes.
- The CNP provides no site specific evidence to demonstrate that a 'single line of housing fronting the road between the existing properties and the Value House development' is a better design solution for development at the Former Tented Camp site than that proposed by our client in their Site Deliverability Statement, which is supported by a site specific Landscape and Visual Impact Assessment and submitted with these representations.
- Our client considers that the reference in the CNP to any development at the site being "*Fleet historic coast guard cottage style and not flat roofed square blocks*" should be removed from the text of the CNP as any new development at the site would respond to its local context, including existing development to the north and east of the site.
- It is considered unreasonable of the CNP to be overly prescriptive with regard to the design of any potential new homes at the site.

#### Landscape

- The CNP provides no site specific evidence base to demonstrate that the site can only support '*limited development*'.
- The NPPF supports development that is 'compatible' with the 'special character' of heritage coasts and the glossary of the adopted West Dorset Weymouth and Portland Local Plan (2015) defines heritage coast as;  
"*A non-statutory designation defining areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.*" (emphasis added)
- The adopted West Dorset Weymouth and Portland Local Plan (2015) does not state that residential development in the heritage coast is considered to be inappropriate.
- The West Dorset, Weymouth and Portland Strategic Landscape and Heritage Study Stage 2 Assessment: Chickerell (July 2018) identifies that the perceptual and experiential qualities of

the area are 'degraded by the holiday park, barbed wire and structures associated with the military training camp, and views to the nearby development'.

- By delivering a scheme that is compatible with the heritage coast our client would not only enhance the perceptual and experiential qualities of the area but would also deliver enhanced connectivity to the heritage coast and the Wyke Regis Wildlife Corridor in perpetuity.

### Conclusions

Pegasus consider that the CNP is unnecessarily restrictive with regard to its descriptions of the quantum and location of development that could come forward at the former Tented Camp site.

Our clients have demonstrated with site specific evidence submitted to the Regulation 16 consultation that that the site can deliver approximately 130 dwellings without impacting on the heritage coast or the Wyke Regis wildlife corridor. Accordingly, it is considered that the site should be allocated in the Neighbourhood Plan for up to 130 new homes.

The position of the CNP with regard to the Former Tented Camp site is not based in site specific evidence nor is the plan 'positively prepared' in accordance with the NPPF (2019) with regard to any changes to housing need that may emerge through Government consultations and the preparation of the new Dorset Local Plan.

The CNP fails to acknowledge that this is a substantial brownfield site with considerable development potential within the Neighbourhood Plan Area.

The CNP proposes a plan period 5 years longer than the current adopted local plan without an associated significant increase in housing numbers to meet local need (the only housing allocation in the CNP proposing a small low density housing scheme under Policy CNP3 Land to the rear of Montevideo House).

*Continue on a separate sheet if necessary*

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

That the Former Tented Camp off Mandeville Road, Wyke Regis should be allocated for residential development purposes for development by the CNP (the site was proposed as an allocation in the former West Dorset, Weymouth and Portland Council 2018 Preferred Options).

Where site specific studies and evidence demonstrate that an increase in the development can be satisfactorily accommodated while providing the mitigation previously sought by the Council at the site; the CNP policy should allow for the site to deliver up to 130 new homes.

*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.**

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Signature: \_\_\_\_\_ Date: 16.10.2020  
*If submitting the form electronically, no signature is required.*

**Data protection**

By signing or electronically submitting this form, you are agreeing to your comments being made publicly available. We will not display your personal data online, however we may share your details with the independent examiner for the purposes of examining the plan. Your information will be retained by the Council in line with its retention schedule and privacy policy ([www.dorsetcouncil.gov.uk/privacypolicy](http://www.dorsetcouncil.gov.uk/privacypolicy)). Your data will be destroyed when the plan becomes redundant.