

Comments on the Chickerell Neighbourhood Plan – Submission Draft May 2020, on behalf of the Owners of Aldwickbury (landowners) and C G Fry and Son Limited (prospective developers of the Land west of Southill site)

- 1. These representations follow those made in February 2020 in respect of the Pre-Submission Draft Plan Dec 2019. (Attached)
- 2. It would appear that the current Submission version of the Plan has not changed very much from the Pre-Submission Version. As a result, the majority of our comments which were previously submitted still stand.
- 3. These latest comments will focus on where there appears to have been some relevant change between the Plans.
- 4. It is welcomed that the wording of paragraph 1.1 has been altered from *our area* required protection of a Neighbourhood Plan to would benefit from having a Neighbourhood Plan.
- 5. However, whilst this wording has been changed the Neighbourhood Plan still overly focuses on protection, without grasping the issues the area faces in terms of housing need, demand and requirements. Dorset Council faces finding a considerable amount of housing land to meet government requirements in terms of housing numbers. There is also a strong possibility that the Council's requirements could increase in the near future, as the government reviews its methodology for calculating those requirements.
- 6. The Neighbourhood Plan presents an ideal opportunity to assist the Council in meeting its housing requirements by spreading development across the Council area in sustainable locations. Unfortunately there is no evidence in the Plan that meaningful liaison has taken place with the Council on how the Neighbourhood Plan could help achieve this within the Neighbourhood Plan area.
- 7. Paragraph 1.10 of the Submission version still states that:

The 2006 and 2015 Local Plans allocated significant sites in Chickerell (in the 'Village') for over 1,100 new dwellings.....As such this strategic level of growth should more than meet any anticipated local need for housing development.



- 8. This statement looks back and not forward. There is no evidence that the Neighbourhood Plan has investigated current needs, demands and requirements for the Neighbourhood Plan's long plan period. A lot of up to date background evidence, particularly on housing need, should be available from Dorset Council, as it gets very close to going out to consultation on its Local Plan Review early in 2021. This evidence should be available in advance of when the Neighbourhood Plan is due for examination.
- 9. The land west of Southill was included as a Preferred Option in the draft West Dorset Local Plan in 2018. When that Plan was stopped in favour of preparation of the Dorset Local Plan, the site has continued to be promoted by CG Fry who now have an option on the land with the landowners.
- 10.In September, Dorset Council published its 2019 Strategic Housing Land Availability Assessment (SHLAA). This rated the suitability of the land west of Southill as follows:

Much of the site has potential for built development. However, the uppermost parts of the site are elevated and exposed. Residential development here would result in unacceptable landscape impacts though the land could contribute to open space provision. <u>A suitable site subject to mitigation</u>. (Our underlining)

- 11. This up to date information on the suitability of the site should be recognised by the Neighbourhood Plan, alongside additional information required on housing needs, demands and requirements.
- 12. Once this has been done the, Neighbourhood Plan's current conclusions about the site would be seen to be flawed.
- 13. Paragraph 10.5 of the Submission Plan still states:

Although not actively being promoted through this Neighbourhood Plan in the absence of any local need, <u>it is accepted this site could be developed subject</u> <u>to suitable landscaping.</u> [Our underlining]

14. If the Neighbourhood Plan Group were to liaise with Dorset Council, it would become more apparent that there is local housing need and that this site would form valuable contribution to Dorset Council's housing requirement.



- 15. If the Plan were to allocate the site, the Neighbourhood Plan could set out guidelines for how it would wish to see development proceed.
- 16. It is also noted that in paragraph 10.6 of the Submission Plan it is stated that:

<u>Some 58% of responses to the Neighbourhood Plan questionnaire agreed the</u> <u>site to be suitable</u>, [Our underlining] but given the significant sites already allocated in the near vicinity 88% of respondents thought this development should await completion of the majority of the existing allocated Chickerell sites.

- 17. Bearing in mind that the Neighbourhood Plan covers the period to 2036 and the West Dorset, Weymouth & Portland Local Plan 2015, which allocated the sites referred to above, only covered the period to 2031, this is not a justifiable reason not to consider this site in the Neighbourhood Plan.
- 18. One part of the Submission Plan that has significantly changed from the Pre-Submission version is Policy CNP 10. This appears to have been expanded to protect a larger area of landscape.
- 19. The original version covered The Landscape Ridge north of Chickerell including Coldharbour. The Submission Plan now covers the Locally Valued Landscape north and east of Chickerell Village. Map 5 is referred to in this Policy. This defines Land of Local Landscape Importance (LLLI).
- 20. The change to Map 5 and proposed designation of an LLLI is objected to. This designation covers the northern part of Land West of Southill and the golf course land to the west. The policy seeks to protect the area for the following qualities:
 - Long views to the Dorset AONB to the north;
 - Rural setting for Chickerell and Radipole villages and wider rural backdrop to north-west Weymouth;
 - Green wedge between Chickerell and Southill/ Radipole; and
 - Part of the north-south wildlife corridor from Radipole Lake SSSI.
- 21. Whilst some parts of this policy may be justified, that part which covers the northern part of the land West of Southill is considered to be excessive. Any development of this land should be required to be accompanied by a Landscape and Visual Assessment, which would help determine how far north any development could go. The landowners have already has such a document prepared which concurs that the upper part of the site would be best used for



open space to protect views. This report does not require such a significant amount of land to be kept free as the Neighbourhood Plan requires however. Additionally, CG Fry are also having their own landscape assessment undertaken.

22. Equally the Plan's reference to:

The green space of the Wessex golf centre forms an essential part of green gap when viewed from the south

is also considered to be excessive control, without proper justification. The justification given in the preceding text to the policy is not clear and convincing. It also fails to recognise that the existing Local Plan has defined development boundaries to settlements with development outside those boundaries strictly controlled. The proposed additional level of control to safeguard green gaps is neither justified nor warranted.

23. Our conclusion on the Submission Version of the Neighbourhood Plan is similar to that given for the Pre-Submission version:

As currently drafted, we conclude that the Neighbourhood Plan does not meet the Basic Conditions for Neighbourhood Plans¹ in that it fails to properly take into account national planning policy in the form of the NPPF and NPG, particularly in respect of ensuring a proper supply of housing. In not doing so it fails to deliver sustainable development and is at odds with the direction of travel for strategic policies being formulated for the emerging Dorset Local Plan. Additionally, it also attempts to introduce landscape controls that are neither properly justified nor warranted.

¹The basic conditions for neighbourhood plans are that they must: have regard to national policy; • contribute to the achievement of sustainable development; • be in general conformity with the strategic policies in the development plan for the local area; and • be compatible with EU obligations.