

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 78 APPEAL

BY MR PAUL CROCKER

REGARDING: Hybrid planning application consisting of:

Full planning permission for a mixed-use development to erect a food store with cafe, plus office space and 2 No. flats above. Erect building for mixed commercial, business and service uses (Class E), (e.g. estate agents, hairdresser, funeral care, dentist, vet). Form vehicular and pedestrian accesses and parking. Form parking area for St. Gregory's Church and St Gregory's Primary School. Carry out landscaping works and associated engineering operations. (Demolish redundant agricultural buildings). Land west of Church Hill.

Outline planning permission (to determine access) to erect up to 120 dwellings. Land off Butts Close and Schoolhouse Lane

PROOF OF EVIDENCE (PLANNING)

by **JO WITHERDEN BSc(Hons) DipTP DipUD MRTPI**

on behalf of **MARNHULL PARISH COUNCIL**

March 2025

PLANNING INSPECTORATE REFERENCE: APP/D1265/W/24/3353912

LOCAL PLANNING AUTHORITY REFERENCE: P/OUT/2023/02644

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1. EXPERIENCE AND QUALIFICATIONS

- 1.1 Marnhull Parish Council ('the Parish Council' or 'MPC') has been granted Rule 6 status in this Inquiry, and has appointed myself (Jo Witherden BSc(Hons) DipTP DipUD MRTPI) as its Planning Witness.
- 1.2 I am a chartered town planner and a full member of the Royal Town Planning Institute.
- 1.3 I have an upper second-class honours degree in City & Regional Planning from Cardiff University and was awarded a distinction in the Diploma in Town Planning from Cardiff University. I also have a distinction in the Diploma in Urban Design from Oxford Brookes University.
- 1.4 Following a brief period in private practice, I have worked in planning policy roles in local authorities across Dorset for nearly 20 years. I was last employed as Head of Spatial Policy and Implementation for Weymouth & Portland Borough Council and West Dorset District Councils, leading a multi-disciplinary team of more than 10 officers dealing with planning policy, environmental assessment, planning obligations, urban and landscape design for the two council areas.
- 1.5 In late 2014 I began working as an independent planning consultant, and in early 2016 I established my own company, Dorset Planning Consultant Limited. During this time my work has included acting as an agent for clients submitting planning applications and appeals, drafting objections to planning applications and representing them at appeal, acting as a Planning Witness at several Inquiries, commenting on emerging development plans, and working with over thirty Town and Parish Councils to successfully take their Neighbourhood Plans through consultation and examination (a list of these is provided in Appendix A1). I have worked for Marnhull Parish Council during this period providing planning advice on planning applications and supporting the preparation of their Neighbourhood Plan.
- 1.6 The evidence which I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the RTPI and Ikarian Reefer principles, and I

confirm that the opinions expressed are my true and professional opinions, and that my duty as a professional planner is to the Inquiry.

2. INTRODUCTION

Main Issues for the Inquiry and structure of this Proof of Evidence

2.1 The Inspector's Post-Conference Note following the Case Management Conference in May 2024 identifies three main issues, which in summary are:

Issue 1: The effect of the development on the character and appearance of Marnhull and on the setting (and significance) of its heritage assets.

Issue 2: The effect of the scheme on highway safety (including pedestrian safety) and congestion in Marnhull.

Issue 3: Whether Marnhull is an appropriate location for housing, retail and commercial development of this scale.

2.2 My proof provides an overview of the landscape and urban design policy context for Issue 1, in support of the Parish Council's concerns on the effect of the development on the character and appearance of Marnhull as expressed by local resident and Chairman of the Parish Council, Cllr Mark Turner. This should be read alongside the Proof of Evidence provided by Mr Stephen Boyce who is a Marnhull resident with a background in cultural funding and development and provides evidence related to heritage matters, and which includes an overview of the related planning policies and guidance for the historic environment.

2.3 Mr Richard Fitter, IEng, FCILT, FICE, FIHE is the Parish Council's Highways / Transport Witness and provides expert witness on behalf of the Parish Council with regard to Issue 2, alongside the evidence provided by Cllr Mark Turner in his proof. Mr Richard Fitter sets out the policy context for transport matters in section 3 of his report, with which I concur.

2.4 Primarily my proof deals with the third issue as a planning matter, and sits alongside the evidence prepared by Cllr Mark Turner who refers to the "lived experience" of Marnhull residents in relation to planning issues. My evidence focuses on how the development

relates to the strategic distribution of development and the policy framework. It also refers to information on the housing land supply position going forward specifically in relation to Marnhull (as referenced by Cllr Mark Turner) and recent evidence on local need in relation to the commercial element, including reference to the outcomes of a recent appeal decision in nearby Stalbridge¹ with which I was involved.

- 2.5 I finally seek to draw together a summary of the principal issues on which the decision is likely to turn, taking into account the evidence presented by the Parish Council's witnesses.
- 2.6 With regard to the S106 legal agreement / proposed conditions, it is understood that the Appellant and Dorset Council will seek to produce an agreed draft of these for scrutiny and comment. The Parish Council continues to reserve the right to comment on these in terms of their suitability and potential omissions.

The Sites and its Surroundings

- 2.7 The background to the appeal and a brief description of the site and surroundings is set out in the Statement of Common Ground produced by Appellant in conjunction with Dorset Council ('SoCG'). As there are different elements to the application, for ease I refer to the full planning permission element as "land off Church Hill", and the outline element as "land off Butts Close".

Relevant Planning History of the Site

- 2.8 With regard to the planning history, in addition to the outline application relating to the 39 dwellings on land off Butts Close (P/OUT/2021/03030) referenced in the SoCG, the Parish Council would also seek to draw the Inspector's attention to the following:
- 2.9 A previous outline application (2/2018/0448/OUT) on part of the land off Butts Close site was made in 2018 by the Appellant. The Appellant applied for outline permission (seeking to agree access only) to develop land by the erection of up to 74 No. dwellings, form vehicular and pedestrian access, central parkland and open space, play area and

¹ Appeal Ref: APP/D1265/W/20/3265743, Land South of Lower Road, Stalbridge, Dorset [CD13.007]

attenuation basin. The application was subsequently amended, with the quantum of development reduced to 58 dwellings. It was then withdrawn 08/09/2021

Illustrative masterplan showing the area which the withdrawn application covered.



Figure 7: Illustrative Masterplan

2.10 The Committee Report on the application for 39 dwellings [CD5.015] refers to this as part of the relevant planning history, and notes:

"This application sought permission for 74 dwellings on 4.6 hectares of land off Butts Close; this is was [sic] subsequently reduced to 58 dwellings in the amended plans. However, the Council remained concerned that the quantum of development would have a harmful impact on the landscape and setting of heritage assets and the benefits associated with the housing would not outweigh this harm. Application 2/2018/1808/OUT was subsequently withdrawn."

2.11 The reason this is relevant is that it highlights the early recognition of the particular sensitivity of the eastern part of the site off Butts Close and the impact of development here on both landscape and heritage.

- 2.12 Reference is made in Appendix 1 of the Appellant's Statement of Case [CD4.005a] that a reserved matters application for the extant permission in relation to 39 homes would be submitted in 2024, but this has not happened, and it is assumed that such an application is on hold pending the decision on this Appeal. It is also noted that the Appellant has stated that they are looking at a variant scheme for 160 homes, but no details of this have been provided.
- 2.13 In relation to land off Church Hill, the planning history for the current surgery and pharmacy was referenced in the Appellant's Statement of Case and is of some relevance². The initial application for these premises (Erect doctor's surgery, form vehicular access with car park, form new amenity / balancing pond, demolish pump house) was made in October 2000 (2/2000/0806) and refused in November 2001, with reference to the proposals being "unduly detrimental and harmful to the visual appearance and rural character of the area". However the committee did indicate that they considered the provision of a new surgery was an essential requirement that was otherwise unlikely to be fulfilled on an alternative site within the settlement boundary, and as such a second application was made in December 2001 (2/2002/0002) which sought to amend the plans to a more acceptable form, and this was permitted in October 2002.

Development Plan Context

- 2.14 A Topic Paper [CD4.018] has been produced by the Appellant in conjunction with Dorset Council to set out their position on the most relevant development plan policies to this appeal.
- 2.15 As referenced in the Parish Council's Statement of Case, the Parish Council would also wish to add Policy 3 of the 2016 North Dorset Local Plan ('NDLP') to this list - which aligns with the Council's Core Strategy and addresses Climate Change. Of particular relevance to this appeal is the statement:

² These have not been submitted as Core Documents but are available as they are published on the Council's on-line register, and can be added if required. However this section simply seeks to provide a quick overview of the decision why this development was allowed in its current location outside of the settlement boundary at that time.

"Where the proposal includes new buildings, they should be located in line with the Core Spatial Strategy in Policy 2 and where possible in areas served by a good range of everyday facilities and facilitate cycling, walking and the use of public transport"

2.16 Also of relevance to this appeal is Policy 24 which deals with matters of Design, and states:

"Proposals for development will be required to justify how the relevant aspects of development form address the relevant design principles and standards set out in Figures 10.1, 10.2 and 10.3 of this policy and how the design responds to the local context."

2.17 It is agreed between all parties that the emerging Dorset Local Plan is at a very early stage and the policies therein should not be given weight at this time.

2.18 The pre-submission (Regulation 14) draft of the Marnhull Neighbourhood Plan ('MNP') [CD6.001] has been subject to the statutory period of consultation, but has yet to be submitted for examination. NPPF paragraph 49 deals with the weight to be attributed to an emerging plan (including Neighbourhood Plans). Although the MNP is making good progress, it is relatively common for decision-makers to only give the policies limited weight at this stage. Nonetheless, the Parish Council does consider that the evidence that has been produced to support the MNP to date will be helpful to this Inquiry, and I agree with this point (and this is supported by the NPPG³) and have made reference to the supporting evidence where appropriate. The Parish Council also reserves the right to submit representations made during the Regulation 14 consultation period to this Inquiry, if any of these are of particular relevance to the appeal (and can if requested make all responses available subject to appropriate redaction).

³ Paragraph: 082 Reference ID: 41-082-20190509 states "Documentation produced in support of or in response to emerging neighbourhood plans, such as basic conditions statements, consultation statements, representations made during the pre-examination publicity period and independent examiners' reports, may also be of assistance to decision makers in their deliberations."

3. ISSUE 1: THE EFFECT OF THE DEVELOPMENT ON THE CHARACTER AND APPEARANCE OF MARNHULL AND ON THE SETTING OF ITS HERITAGE ASSETS

National Planning Policy and Guidance particularly relevant to Issue 1 (in regard to character and appearance)

- 3.1 National Planning Policy requires planning policies and decisions to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)⁴. Planning decisions should also contribute to and enhance the natural and local environment, recognising the intrinsic character and beauty of the countryside⁵.
- 3.2 National Planning Policy specifically refers to the importance of protecting and enhancing valued landscapes⁶ – though it is a matter of debate whether this would apply here given that there is no agreed definition of what constitutes a ‘valued landscape’ if it is not designated as such or otherwise identified in the development plan⁷.
- 3.3 NPPF paragraph 132 notes that “Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.”. It goes on to state that “Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code.” This is of relevance in considering the design guidance that has been prepared as part of the work on the Marnhull Neighbourhood Plan.

⁴ NPPF paragraph 135

⁵ NPPF paragraph 187b

⁶ NPPF paragraph 135

⁷ NPPF paragraph 187a

Relevant Development Plan Policies to Issue 3

3.4 NDLP Policy 4 on the Natural Environment states that “Developments should be shaped by the natural environment so that the benefits it provides are enhanced and not degraded.” The policy makes clear that this applies to designated sites, valued landscapes and other features that make an area special, and the supporting text refers to both the AONB designations and acknowledges that “other landscapes are valued at a more local level” (paragraph 10.16). It goes on to state that, where a significant impact on landscape character is likely to arise as a result of a development proposal, “developers will be required to clearly demonstrate that the impact on the landscape has been mitigated and that important landscape features have been incorporated in to the development scheme” The supporting text (at para 4.55) notes that the landscape provides an important setting for settlements and contributes to local distinctiveness and a sense of place, and that this includes patterns of settlement.

3.5 Relating to this, Policy 24 is also relevant, as it requires that development can be designed to improve the character and quality of the area within which it is located. Proposals must use development forms which reflect and do not conflict with the relevant design principles and standards. The supporting text (paragraph 10.59) explains that:

“An understanding of the local context is fundamental to establishing good design for any particular development site. It should concentrate on the sites existing features, characteristics and immediate surroundings but equally consider how the site sits within the wider landscape or townscape, the historic environment and how people will interact with the place being created”

3.6 The need to respect local character and people’s understanding and appreciation of the area is also reflected in Local Plan’s design principles, which emphasise the need for development to “respond to and reinforce locally distinctive patterns of development, landscape and culture”.

Strategic Landscape and Heritage Study for North Dorset Area

- 3.7 Cllr Mark Turner and Mr Stephen Boyce refer to the assessment and guidance provided in the Strategic Landscape and Heritage Study for North Dorset Area (Assessment of Villages) [CD5.014] in their evidence. Whilst not formally adopted as policy, it provides guidance specific to Marnhull on issues to consider in relation to the siting and design of development with regard to the landscape character and sensitivities of the village. The most relevant points in relation to this appeal and the character of the village (other than heritage matters) relate to:
- i) the low density and distinctive and historic linear settlement pattern;
 - ii) the strong rural character and high levels of tranquillity;
 - iii) the importance of views from the public rights of way and long distance recreational trails, including views to the church tower.

Marnhull Design Guidelines

- 3.8 Design guidelines and codes for Marnhull have been developed as part of the work underpinning the Neighbourhood Plan [CD6.002]. The document was prepared by AECOM⁸, informed by the National Design Guide and National Model Design Code, the 2023 Parish Survey, discussions with the MNP Steering Group and a site visit in October 2023. The first iteration of the document was subject to consultation (which took place in June / July 2024 and included both the local community, the adjoining parish councils, Dorset Council, the Environment Agency, Historic England and Natural England), prior to being finalised.
- 3.9 Of particular relevance to this appeal and impact on settlement pattern and character, are the following points guidance / codes:

⁸ A multidisciplinary environmental consultancy, commissioned through the Ministry of Housing Communities and Local Government Neighbourhood Planning Programme led by Locality

Linear settlement pattern as illustrated in the Marnhull Design Guidance

- i) Future development should not branch out of the defined settlement pattern so as to significantly alter the historic form of Marnhull (the village has a clear linear pattern with no village centre). (01.RC.1A)
- ii) Where development branches off the main routes, this should be designed to maintain a simple, rural character and avoid being of an overly complex layout. The gaps between these roads should be maintained, and the depth of development branching off the main linear routes should generally not exceed 100m in length (before reaching open countryside). (01.RC.1D)



Figure 19: Linear settlement pattern along the roads in yellow (—) and village boundary in red (—). Image source: Bing Satellite Imagery.

- 3.10 At a more detailed level, guidance on layout includes the following points:
 - i) Overall, new development should not exceed 20 dwellings per hectare (dph) in any 200 sqm grid. (01.RC.1A)
 - ii) The informal and varied building line present within the older parts of the village, should be reflected in new development, by using slightly scattered setbacks to create an interesting street scene. (01.RC.2A)
 - iii) Building orientation should reflect the informal and varied arrangement present in the village - although street-facing orientations are most common, many dwellings are oriented at a variety of angles. (01.RC.2B)
 - iv) The variation in plot size and shape is also a key feature of the village, and should be reflected in new development. (01.RC.1B)
 - v) Parking spaces should be set behind the building line. Where front-of-building parking is the only possible option, manoeuvring areas should not dominate the street frontage. (01.RC.3B)

Character and Design Matters

- 3.11 Cllr Mark Turner’s evidence shows the importance of the character and appearance of Marnhull to its residents, why he believes that the two sites make a very strong contribution to the area’s character, and why this would be harmed by the Appeal proposals. Many of these points are also relevant to and overlap with Mr Boyce’s evidence, and the guidance written for this area. The distinctive landscape characteristics of Marnhull are well documented, and harm to these, which I have considered and summarise below, should be given due regard in the decision-making. In short, these are:
- 3.12 **The impact on the dispersed, linear settlement form.** The development of land off Church Hill will eat into an important rural gap between New Street and Burton Street, which is not only important to the setting of the Conservation Areas and a number of historic buildings, most notably the Grade 1 Listed Church, but also in the relationship between the village and the countryside. The linear and dispersed nature of the settlement and wealth of public footpaths routes means that residents never feel far from the countryside – but this will diminish as experienced from Church Hill. The importance of this space is recognised by the community who strongly support the Neighbourhood Plan’s proposal to designate these fields as a Local Green Space⁹. Similarly, the development of land off Butts Close will eat into the gap between New Street and the separate hamlet of Walton Elm, and again this space is not only important to the setting of the Conservation Area¹⁰ and a number of historic buildings, most notably the Grade 1 Listed Church, as well as having cultural associations as the scene of the May Day dancing in Thomas Hardy’s novel *Tess of the D’Urbervilles*. The western part of this field is similarly proposed to be designated as a Local Green Space¹¹. The retained gaps shown in the indicative layout are relatively narrow in their extent, and are unlikely to be read as countryside, and the road linking through the site would follow an uncharacteristically circuitous route. The officer’s report that considered the current permission for 39 dwellings within the western end of the appeal site [CD5.015], picks up on the importance of the settlement pattern and why, in

⁹ The reasons for the designation of LGS05 are set out on page 92 of the MNP [CD6.001]

¹⁰ And I also note that the Conservation Area Appraisal [CD6.003] provide evidence to justify that Walton Elm to the south, extending as far north as the junction with Chippel Lane, should also be designated as a Conservation Area

¹¹ The reasons for the designation of LGS16 are set out on page 92 of the MNP [CD6.001]

their opinion, a lower level of development was acceptable: "Marnhull has historically developed in a linear fashion along thoroughfares which bound together the various hamlets, whose individual character is at risk of being eroded elsewhere in the village. The development site, now pushed to the western part of the current field, has the opportunity of broadly following this pattern, with linear elements reflecting both New Street and Chippel Lane, though without encroaching further towards the various hamlets".

3.13 **The harm to much valued views.** The development of land off Church Hill will impact on a significant number of views of the Church and Conservation Area from the public footpaths crossing that field and from further away, as will the development off Butts Close. This is relevant not only in terms of their historic significance, but also as part of the landscape character of the area. An assessment of valued views was undertaken as part of the evidence underpinning the Neighbourhood Plan. The assessment used a consultation which asked local residents to highlight the various views around the village that they particularly cherished, as the first step in identifying potentially important views. These were then visited and assessed by the Steering Group, taking into account the nature of the view, the type and frequency of users, and whether there were distinctive features within or detracting from those views, as explain in the Views Report [CD6.004]. Views 1, 3, 9, 10/10a, 12, 24 would be all be impacted, and to a degree views 25/25b (more so if light pollution cannot be adequately controlled, although these will require reassessment following the completion and occupation of the adjoining scheme). For ease, a map of these is provided in Appendix 2, overlain with the more limited range of viewpoints assessed in the two LVIA's provided by the Appellant [CD1.037 and 038].

3.14 **Impact on tranquillity.** Both sites enjoy a degree of tranquillity, particularly as experienced from the public footpaths crossing each site when the user is within what is clearly countryside. This tranquillity will be lost as the sites become busy with development and activity, but the impact on tranquillity will also reach further out given the increase in traffic on the network of rural roads around the village. There is no obvious consideration of this in the LVIA information submitted by the Appellant [CD1.037 and 038], and how this will impact on the enjoyment of the views and enjoyment of the public rights of way and recreational trails, including the Hardy Way as it runs up Church Hill (adjoining what will be a large area of parking).

- 3.15 **Impact on dark skies.** The Appellant has not submitted a lighting statement on the basis that no external lighting is proposed at this stage¹², yet it is quite clear that a development including large areas of parking to serve a commercial / business hub that is intended to accommodate a comparatively large convenience store and other shops will have external lighting to operate – comparisons can be drawn with similar sized Lidl and Aldi stores with which I am sure many people are familiar. I have been unable to find any assessment of this in the LVIA information submitted by the Appellant [CD1.037 and 038], and in the absence of such evidence there is no certainty that the impact of a lighting scheme can be suitably mitigated through condition to avoid any unacceptable degree of harm.
- 3.16 At a more detailed level, it is acknowledged that the design of the proposed development on land off Church Hill has responded to the local vernacular in terms of its material palette, and is in a form and character that seeks to emulate local, traditional farm layouts, which in my professional opinion is an appropriate response if it is accepted that the site should be developed. The inclusion of trees within the parking areas is also noted, but as these are forward of the building line (including the servicing area for the larger retail unit) and likely to be subject to lighting, the planting is insufficient to ensure these areas do not dominate the street frontage along which the Hardy Way runs. This matter (insufficient planting) was raised in the comments made by Dorset Council’s Urban Design Officer in relation to the south-east corner of the site, and it should be possible to correct and condition the relevant plans.
- 3.17 Turning to the land off Butts Close, as an outline application the layout, scale, appearance and landscaping is not intended to be fixed at this stage, and I am not aware of any parameter plans that have been proposed to be conditioned, and therefore this is not a matter I discuss further here, other than to note that, in the view of the Parish Council, the indicative plans and site sections are inappropriate, and would fail to conserve or enhance the character of the village, and I share their concerns. In terms of the point of access onto Schoolhouse Lane, it would appear that the Appellant’s estimate that some 10 – 15m of hedgerow will need to be removed to either side of the new access¹³ significantly underestimates the loss to provide the required visibility splays as shown on the latest plans

¹² As explain in Section 4 of the Appellant’s Planning, Sustainability, and Lighting Statement [CD1.044]

¹³ paragraph 5.9 of the Appellant’s Ecological Impact Assessment [CD2.003]

[CD4.022], and as such the impact on the character of the road and entrance into the village will change significantly. There is no clarity as to what replacement boundary treatment is proposed in order to assess this impact.

3.18 Whether either site qualifies as a valued landscape is a matter of judgement in the absence of a site being so designated through policy, and advice on this is provided in the Landscape Institute Technical Guidance Note 02/21 [CD5.016]. Table 1 of that report identifies a range of factors that can be considered when identifying landscape value, and which include:

- i) Natural heritage – one example given being the presence of wildlife and habitats of ecological interest that contribute to sense of place;
- ii) Cultural Heritage – one example given being whether the landscape contributes to the significance of heritage assets, for example forming the setting of heritage assets;
- iii) Landscape Condition – one example given being intact historic field patterns, and the absence of detracting / incongruous features (or features are present but have little influence);
- iv) Associations – one example given being associations with well-known literature, poetry, art, TV/film and music that contribute to perceptions of the landscape, another is in terms of associations with a famous person or people.

3.19 The proposed development sites would appear to score positively in regard to all these points, in particular in light of the evidence presented on cultural heritage and associations. They both contribute strongly to the significance of the Marnhull Conservation Areas, the land off Butts Close is associated with famous people and well-known literature and art, they include wildlife and habitats of ecological interest that contribute to sense of place (such as the native hedgerows along Schoolhouse Lane¹⁴), are in relatively good landscape condition¹⁵. It would therefore appear appropriate to consider the impact of the development in the context of one or both areas being a valued landscape. The Appellant's LVIA fails to consider whether the landscape is a valued landscape based on these criteria.

¹⁴ as referenced in the Appellant's ecology report [CD2.003]

¹⁵ The Appellant's LVIA judges both sites as being in medium landscape condition [CD1.037 and 038]

4. ISSUE 3: WHETHER MARNHULL IS AN APPROPRIATE LOCATION FOR HOUSING, RETAIL AND COMMERCIAL DEVELOPMENT OF THIS SCALE

National Planning Policy and Guidance particularly relevant to Issue 3

- 4.1 Section 5 of the NPPF deals with housing supply. Paragraph 61 refers to the Government's objective of significantly boosting the supply of homes, and how it is important for sufficient land to come forward where it is needed with the aim of meeting an area's identified housing, including an appropriate mix of housing types for the local community. Specific advice is given in relation to rural areas, with paragraph 82 stating planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Specific reference is made to the use of rural exception sites as a means of providing affordable housing to meet identified local needs in locations where sites would not normally be used for housing, and potentially allowing some market housing on these sites to help facilitate this. Paragraph 83 states that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.
- 4.2 Section 6 of the NPPF deals with economic development. In relation to rural areas, planning decisions should enable "the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings"¹⁶. Paragraph 89 advises that such decisions should recognise that this may be adjacent to or beyond existing settlements, and in locations that are not well served by public transport. The Framework goes on to specify that

"In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and

¹⁶ NPPF paragraph 88

sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

- 4.3 With reference to Class E type uses, the Framework deals with these at two levels. Firstly in section 7 where it deals with ensuring the vitality of town centres, paragraph 90 states that planning decisions “should support the role that town centres play at the heart of local communities” – and this leads on to the application of the sequential test for main town centre uses. This sequential test does not need to be applied to “small scale rural offices or other small scale rural development” but does not define ‘small scale’ in this context¹⁷, which suggests that this is a matter of judgement for the decision-maker. Section 8 deals with promoting healthy and safe communities, and paragraph 98 is the most relevant part, and refers to looking to plan positively for community facilities (including local shops), and other local services, to enhance the sustainability of communities and residential environments. It also seeks to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs, and advises taking an integrated approach to considering the location of housing, economic uses and community facilities and services.
- 4.4 Section 15 of the NPPF is also relevant regarding the location of different developments insofar as it states that “planning policies and decisions should contribute to and enhance the natural and local environment” by, amongst other things, recognising the intrinsic character and beauty of the countryside, as is section 9 on promoting sustainable transport, and section 11 on making effective use of land.
- 4.5 It is notable that throughout the guidance, national policy is clear that it is appropriate to take a different approach to rural areas than to towns and cities. It places considerable emphasis on being responsive to local circumstances and local / community needs in rural areas, recognising that these areas are less sustainable (having poorer public transport provision and fewer, more locally-focused facilities and services).

¹⁷ The NPPG references a threshold of 2,500 sqm to require an impact test in paragraph: 015 Reference ID: 2b-015-20190722 <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres#gross-retail-floorspace>, but it is not clear whether the same definition of small scale should be applied to the sequential test.

Relevant Development Plan Policies to Issue 3

- 4.6 The need to address the causes and effects of climate change, to have more sustainable forms of development, to conserve and enhance the area's locally distinctive historic and natural environment, as well as the need for more housing, more cohesive communities, a more robust and prosperous economy, and a range of community, leisure, cultural and recreational facilities in locations that are accessible to the local population, all feature in the NDLP's vision (paragraph 2.46). These flow through to its 6 objectives, which differentiate between the role of the market towns, which are to be the main focus in the District for housing development, enhanced employment and improved services, and the network of sustainable smaller rural communities where a general policy of restraint is to be applied, whilst also enabling essential rural needs to be met, with development focussed on meeting local (rather than strategic) needs. This vision (and the related objectives) sets the Plan's strategy, and is central to Policy 2 (Core Spatial Strategy) of the Local Plan, and is also relevant to Policies 3 (Climate Change) and 20 (The Countryside) and the various policies on housing, economy, retail, leisure and other commercial developments.
- 4.7 NFLP Policy 2 is the Council's Core Spatial Strategy, and follows national planning policies which seek to focus significant development on locations which are or can be made sustainable (NPPF paragraph 110), and which (in rural areas) respond to local circumstances and support housing developments that reflect local needs (NPPF paragraph 82) and recognise the intrinsic character and beauty of the countryside (NPPF paragraph 187b). This approach is broadly consistent with national policy, and does not give a blanket ban to housing, but expects the level of housing to reflect local (rather than strategic) needs. Whilst it does refer to the role of settlement boundaries in distinguishing between the towns and larger villages and the countryside, in light of the changing housing needs Dorset Council has not applied these rigidly in planning decisions (as evidenced by the approval of up to 61 dwellings on the site North of Burton Street, Marnhull (2/2018/1808/OUT) and off Butts Close (P/OUT/2021/03030) when it was recognised that the shortfall in the housing land supply). Nor has this approach been limited to those times when the Council's housing land supply has fallen below the established threshold (as is suggested in paragraph 1.4 of the Appellant's Statement of Case), which can be shown by the Council's approval of about

140 new homes outside of the updated settlement boundary of Blandford (in the adjoining parish of Pimperne), in August 2024 (P/OUT/2020/00026)¹⁸.

- 4.8 The Local Plan explicitly recognises the importance of carefully managing development at Stalbridge and the other villages, as in the past housing development had significantly exceeded planned rates, and that this unsustainable spatial distribution of development should not be repeated (para 3.40). The 825 new homes anticipated for the rural areas in Policy 6 of the Local Plan, whilst not intended to act as an absolute cap on housing numbers, provides guidance on the scale of development that was considered to be sustainable. This target was exceeded in 2022/23 (some 8 years prior to the end of the plan period), and according to the 2023/24 monitoring report for the North Dorset area [CD5.017], is likely to reach in excess of 2,000 completions by 2031.
- 4.9 NDLP Policy 3 is also relevant insomuch as climate change is a real and urgent issue, and the likelihood that there would be greater harm from greenhouse gas emissions as a result of increased travel because of the less sustainable location of the development. To this end the policy states that “Where the proposal includes new buildings they should: a) be located in line with the Core Spatial Strategy in Policy 2 and where possible in areas served by a good range of everyday facilities and facilitate cycling, walking and the use of public transport.”
- 4.10 NDLP Policy 20 deals with the countryside, and states that Stalbridge and the eighteen larger villages will form the focus for growth outside of the four main towns, and that outside the defined settlement boundaries development must be of a type appropriate to that location (as per the relevant NDLP policies), or an ‘over-riding need’ proven. The supporting text (paragraph 8.192) clarifies that Neighbourhood Plans can meet local needs in different ways, which may include reviewing settlement boundaries or allocating sites for development.
- 4.11 Policies 11 and 12 relate to the economy, and retail, leisure and other commercial developments respectively. In relation to rural areas, Policy 11 on the economy envisages “enabling rural communities to plan to meet their own local needs, particularly through

¹⁸ The related files to this case are extensive and have not been submitted as Core Documents but are available as they are published on the Council’s on-line register, and can be added if required.

neighbourhood planning” and similarly on retail / main town centre uses, Policy 12 refers to “working with local communities to take forward proposals for town centre enhancement and growth through neighbourhood planning or other local, community-based initiatives.” This approach is reflected in the supporting text (paragraph 6.43) which explains that new commercial community facilities may be permitted where an existing building is re-used (under Policy 29) or alternatively, sites for new commercial community facilities may be allocated by local communities in neighbourhood plans.

- 4.12 In summary, the thrust of the Council’s spatial strategy is to direct larger scale, strategic development to the main towns as the more sustainable locations, which in turn:
- i) reduces the need to travel, as these settlements have greater access to a wider range of jobs and services and public transport;
 - ii) supports the effective and efficient provision of services and focused infrastructure investment;
 - iii) places greater emphasis on urban renewal and the use of brownfield sites;
 - iv) helps to safeguard the character of the countryside, including its villages;
 - v) reduces transport-related pollution including greenhouse gases.
- 4.13 By responding to local circumstances and supporting housing developments that reflect local needs in rural areas, the strategy also reinforces social networks / support at a local level (as the occupants would have stronger existing ties to the area and are more likely to have local jobs / friends / relatives).

Housing Need and Supply

- 4.14 The Parish Council defers to Dorset Council’s expertise on the overall housing land supply figure for the Dorset area, noting the Topic Area on this subject .
- 4.15 As set out by Cllr Mark Turner, with reference to the evidence produced in preparing the MNP, at a local (parish) level there is no clear need for either the affordable or open market housing. Furthermore, the Appellant’s site off Salisbury Street (P/OUT/2023/00627) has yet to reach reserved matters stage, and this should allow the mix of homes on that site to take account of the most recent evidence of need, whether this is taken from Dorset Council’s

housing register or an up-to-date housing needs survey. Given the considerable over-supply against existing need as evidenced, Cllr Turner rightly points out that the resulting level of growth as a result of the permitted developments, plus this Appeal, would be wholly disproportionate to the village, and that this was not the Government's intent in revising the standard method for housing requirements¹⁹.

4.16 Nearby Stalbridge has similarly seen a significant increase in planning permissions as a result of the lack of housing land supply in recent years. Stalbridge is the smallest town in the North Dorset area, with a population of about 2,400 people (1,100 households) according to the 2021 Census²⁰. Whilst it had about 28 service / retail outlets when audited in 2018 [CD5.011], and has two large industrial estates either side of Station Road, the spatial strategy groups it with the larger villages. As such, the town was not given a specific housing target or policy (unlike each of the four main towns, where an integrated approach was taken that considered the needs and appropriate location for housing, employment, facilities and services). The most recent monitoring report for the former North Dorset area [CD5.017] includes sites permitted up to end March 2023, and shows that 175 new dwellings were built in Stalbridge in the three years between 2020-2023, and at that time there was a further supply of 300 homes across 4 large unallocated sites. Since then, an application for up to 160 dwellings has been allowed on appeal²¹. All of the sites had the expected quota (40%) of affordable housing subject to a S106 / UU agreement, with one for 60 homes (off Thornhill Road) being delivered by a local housing association for 100% affordable housing. For context these are shown on the map in Appendix 3.

4.17 The reason Stalbridge is mentioned here is that the developer of one of the remaining sites (which would deliver 114 homes on land South of Lower Road²²) has held discussions with Dorset Council and subsequently submitted a non-material amendment application (P/NMA/2023/04956) to substitute the requirement for 46 affordable housing units on their site with open market units. This amendment was approved in January 2024. The application to modify the S106 agreement is still to be determined (P/MPO/2023/04874) but

¹⁹ Cllr Turner's proof refers to the WMS that the revised housing requirements was "a stable and balanced approach" and that this "requires local authorities to plan for numbers of homes that are proportionate to the size of existing communities". <https://questions-statements.parliament.uk/written-statements/detail/2024-07-30/hcws48>

²⁰ <https://www.ons.gov.uk/visualisations/customprofiles/build/> based on Stalbridge – built up area

²¹ APP/D1265/W/23/3333249, approved July 2024

²² APP/D1265/W/20/3265743, approved November 2021 [CD13.007]

the supporting statement [CD5.019] explains that Stalbridge has been well served recently in relation to Affordable units, that the affordable housing provision may be better suited elsewhere, and a commuted sum figure of £1.765 million had been informally agreed with Dorset Council. An email from the Housing Enabling Team Leader in August 2023, appended to that statement, reads

"I am supportive of a financial contribution towards affordable housing being provided on this site rather than the usual on-site contribution...."

The reason I am supportive of this approach is because of the high levels of affordable housing that have been built in the area recently, and that are planned to be built in the near future...."

The financial contribution will be used to increase the stock of housing available [sic] for homeless people in the Dorset Council area."

- 4.18 Given this scenario, and current evidence of affordable housing need, it is difficult to conclude that Marnhull is an appropriate location for more affordable housing, particularly relating to the mix of house types proposed, and in light of its peripheral location in Dorset.

Employment / Commercial Facilities Need and Supply

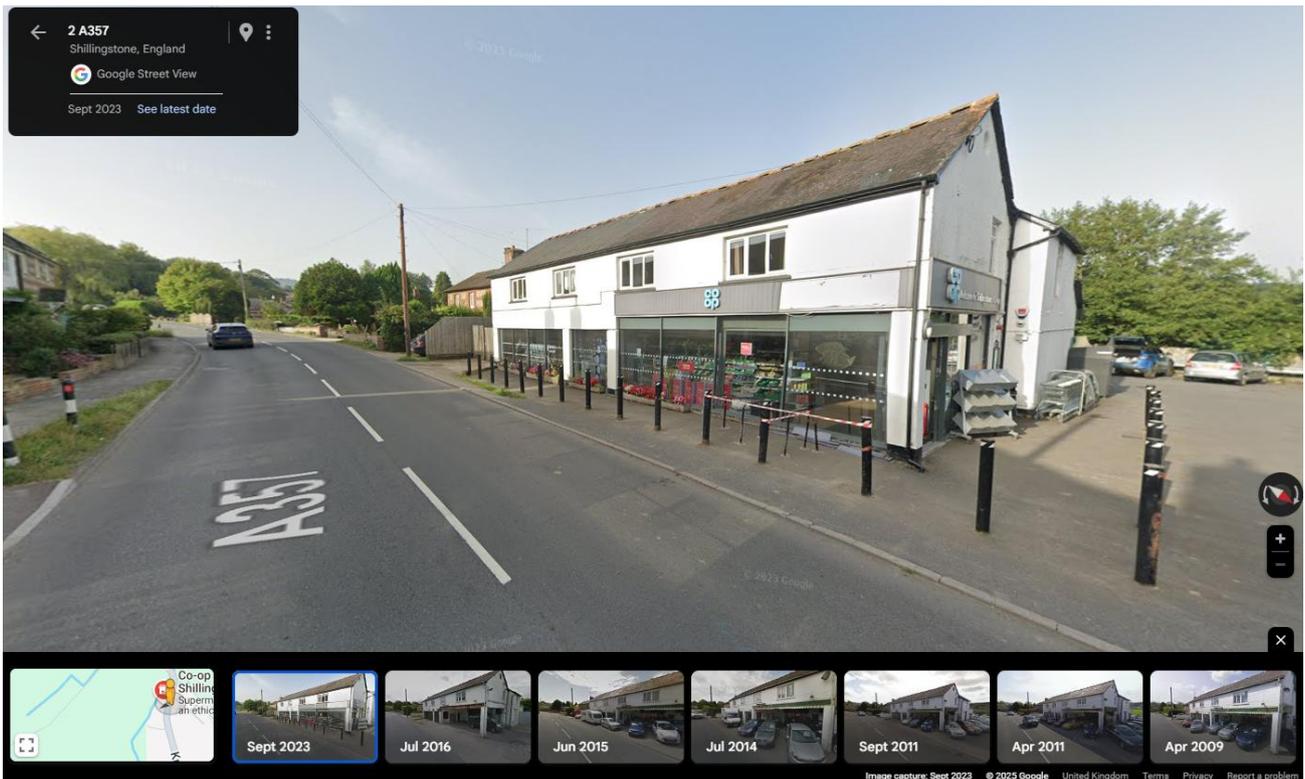
- 4.19 In terms of the proposals for retailing and other main town centre uses (totally 2,356 sqm of floor area), Cllr Mark Turner provides evidence that most residents of the village greatly value the existing convenience stores, that these stores are reasonably well placed to serve the older Burton Street and New Street areas of the village, and having a larger food store and other commercial units in a "new" village centre location is not supported by local residents. Whilst the provision of such facilities on land off Church Hill would be more convenient for those living on the eastern side of the village, there is no clear evidence of a local need for a convenience store of this scale, or for the number of other commercial units. Whilst these could provide potential local employment opportunities, data from the 2021 Census [CD6.001 Appendix 2] shows unemployment levels well below the national average.

- 4.20 Dorset Council's latest Retail and Leisure Needs Assessment [CD5.012] explains how "the challenging economic conditions and growth in online sales have had a significant and permanent impact on consumer shopping and spending behaviour. This has created significant challenges for traditional 'bricks-and-mortar' retailing and the high street." It quotes data showing that the UK lost 11,000 shops in 2020, with a further 18,000 estimated to close in 2021. It notes the high numbers of retailers that have either closed or have significantly reduced their store portfolios. It forecasts that the potential capacity (based on predicted levels of housing growth across the county) is likely to be modest and not of a sufficient quantum to justify identifying and allocating new sites, particularly as the capacity can be met by the take-up and/or repurposing of vacant units and sites within the main centres and prime shopping locations.
- 4.21 Whilst the study notes that nationally growth in new stores has continued from 'deep discount' food operators (such as Aldi and Lidl) within the local area, current evidence (taken from their websites²³, as shown in Appendix 4) shows that Aldi is specifically targeting the much larger towns of Dorchester and Winchester, and Lidl is targeting Salisbury, Sherborne and Wimborne. Their websites indicate that their typical minimum size requirements are for a store of at least 18,000 sq ft (1,672 sqm), a catchment of 15 - 20,000, and a location on a prominent main road frontage with good visibility and access. These are not met by the Appellant's proposed location or plans²⁴.
- 4.22 There has been some evidence of retail investment in the wider North Dorset area in recent years, with Co-op Food opening a new store (a converted car showroom) on the A357 in Shillingstone about 2 years ago. However this was a smaller format store (the planning history records indicate the store has 195 sqm of retail floor space) and is on the main road (the A357), in a village where there was no retail provision other than the limited choice provided through the local garage forecourt store (the previous village Londis store having ceased operating about 10 years prior).

²³ <https://www.realestate-lidl.co.uk/new-store-site-requirements> and <https://www.aldi.co.uk/corporate/property/required-towns>

²⁴ The Appellant's plans indicate a gross area of approximately 15,500 sqft (1,455 sqm) including a Post Office and café, which would be about 13% smaller and use a more complex layout atypical of the Aldi and Lidl standard models.

Google Map Street View of Shillingstone Convenience Store (2023)



4.23 There is a lack of clarity in the Appellant’s Statement of Case as to whether the commercial units are dependent on funding from the housing provision. Such a claim is not made in the main document, and no viability information or indication of any phasing of the development has been provided, but Appendix 1 to their Statement of Case describes the 120 new homes off Butts Close as ‘enabling development’ suggesting that financing may be required.

4.24 On this basis there are obvious concerns that there will be little if any interest from current operators on the convenience store format proposed. There may be some interest in the smaller shop formats from entrepreneurs living in or close to the village – but as with the convenience store these will suffer from lack of passing trade being positioned away from the main road. Alternative locations on the main road for such enterprises have been identified through the draft Neighbourhood Plan [CD6.001].

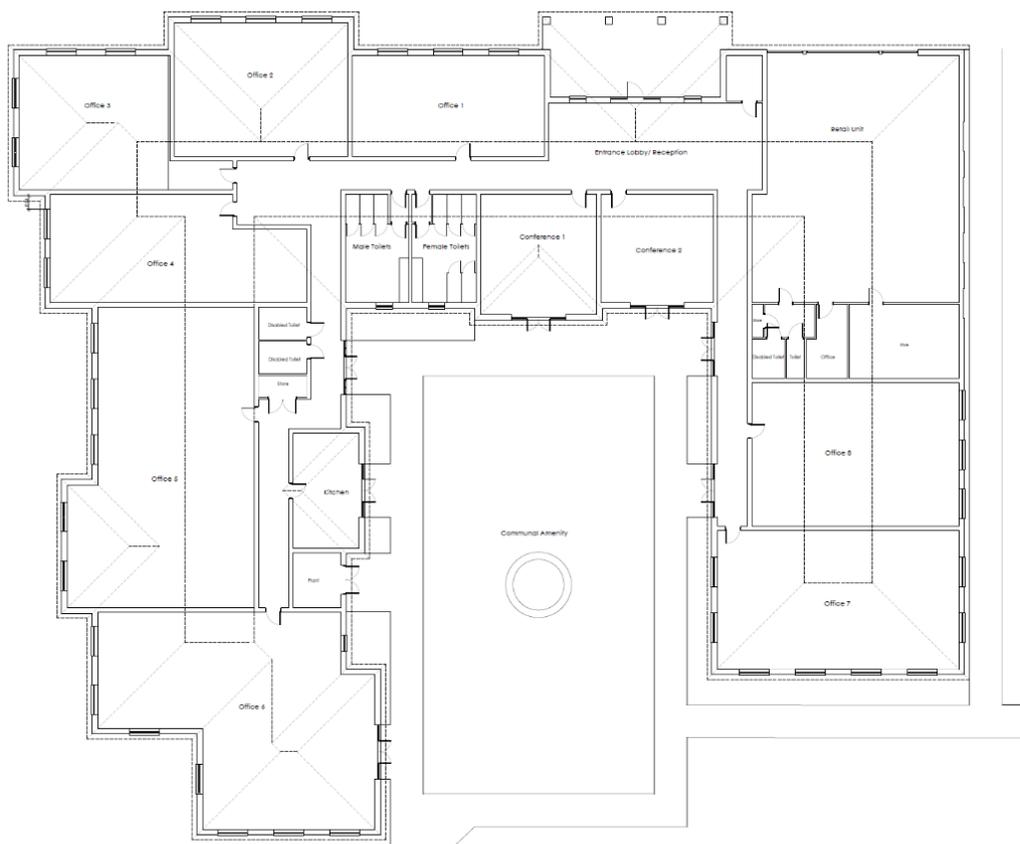
4.25 It is again relevant to draw parallels with the nearby small town of Stalbridge, where the application for 114 homes on land South of Lower Road was part of a larger application including up to 2,000 sqm of Class E employment space including an element of retail (with the condition that no more than 280 sqm of the employment space approved should be

used as retail space). The application was determined at a Public Inquiry where I acted Dorset Council's planning witness [CD13.007]. The Appellant in that case referred the Inspector to data from Dorset's Economic Growth & Regeneration Department, showing enquiries that they had received for the Sturminster Newton Catchment area to illustrate demand for commercial / employment units in this area, and confirmed that they had an agreement with a separate company, Manual Investing Ltd, who would be taking forward this element of the scheme if permission was granted, and that they would work with Dorset Council's Economic Growth & Regeneration Department team to deliver the scheme to best accommodate local business needs and requirements, with flexi workspace units that could be modular from an internal perspective to meet different business needs flexibly. They went on to state that their proposals should create circa 131 full time jobs, if the site were to deliver a mix of:

- retail – 100 sqm @ 15 sqm per employee
- general office space – 1100 sqm @ 12 sqm per employee
- studio/maker spaces – 800 sqm @ 25 sqm per employee.

4.26 The reserved matters application (P/RES/2022/06181) was submitted by David Wilson Homes, and approved in June 2023. I have reviewed the submission and approved plans, and can confirm that this included the provision of a single story building comprising a retail unit and 8 office units with shared conference rooms and utilities. The accompanying planning and design and access statements do not explain the rationale behind the design of the employment or retail elements, or mention any discussions with the Economic Growth & Regeneration Department.

Layout plan and Commercial unit layout are reserved matters stage, as per submitted plans



Rev	Date	Drawn	Checked
1	10/08/20	GD	GD
2	10/08/20	GD	GD
3	10/08/20	GD	GD
4	10/08/20	GD	GD
5	10/08/20	GD	GD

LAD OYNS LOWERS ROAD
 STALFORD
 STAFFORDSHIRE
 BOULETTS UNIT
 FLOOR PLAN



- 4.27 Dorset Council's website then shows a further application made in February 2024 (P/FUL/2023/07515) by David Wilson Homes to develop that part of the site for 25 No. dwellings (including 10 No. first homes and 4 No. live/work units). The housebuilder's Planning Statement [CD5.020] notes that "Throughout the course of the Reserved Matters application, it was evident from our discussions with Dorset Council and Stalbridge Town Council that there is not a demand for a large commercial building within Stalbridge as per the planning approval" and that "Barratt David Wilson Homes have had discussions with commercial agents local to the area who believe that the 4 x live/work units proposed will fill a demand in the area for this type of provision whereas a retail unit has the potential to take away footfall from the existing facilities in the village." The decision on this application is pending (as of early March 2025), with updated information submitted in May / June and December 2024 in response to feedback, and no objection has been raised by the Economic Development section of the Council.
- 4.28 Given this scenario, and lack of evidence to substantiate a local need for provision of this scale, it is difficult to conclude that Marnhull is an appropriate location for the proposed commercial units.

Conclusions on Issue 3

- 4.29 In my professional opinion, having reviewed the evidence, Marnhull is not an appropriate location for housing, retail and commercial development of this scale. I summarise briefly below the main points that lead me to this conclusion:
- i) The scale and location of the proposed development conflicts with the spatial strategy – which focuses significant development at the main towns which have good access to services and employment opportunities, and offer a genuine choice of transport modes, whilst allowing development in locations such as Marnhull where required to meet a local (not strategic) need. The spatial strategy is broadly consistent with the NPPF and still of relevance;
 - ii) There is no clear evidence of local need for the proposed development. There is no local need for affordable housing, given the capacity to exceed wider local demand on the existing permitted sites, including those owned by the Appellant. On this basis it is not

certain that these could be secured through condition / legal agreement (given the necessity test) or would be delivered. There is also no evidence of open market housing needs arising from the local area that will not be met on the existing permitted sites, including that owned by the Appellant. Turning to the proposed commercial element, the claim in the Appellant's Statement of Case that this will enhance the everyday facilities is dependent on it being built and occupied, yet evidence suggests that this is unlikely given its location, catchment population and competing nearby centres (such as Sturminster Newton and Stalbridge), and is certainly not guaranteed. Whilst the employment this development would generate may be of some benefit, there is no evidence that it is needed and would be delivered;

- iii) The scale of this development (both on its own and cumulatively with the extant permissions) cannot be accommodated without harm to the character of the village, and its heritage, as evidenced;
- iv) The cumulative growth of the village at this scale, coming forward as speculative development without the benefit from the forward thinking and planning associated with a policy base either set in the Local Plan (such as was the case for the main towns) or through the Neighbourhood Plan, results in poor and uncoordinated infrastructure planning (both in terms of highways as evidenced in Issue 2, and other infrastructure as highlighted in Cllr Turner's evidence), as well as undermining the plan-led system. The Appellant's Statement of Case appears to suggest that such matters can largely be dealt with "at the reserved matters stage providing the necessary detail for a final determination on infrastructure provision and plan compliance when the final quantum of development is known" but this is simply unrealistic, particularly given the need to secure the appropriate legal agreements and financing at this stage.

5. DECISION-MAKING AND THE PLANNING BALANCE

- 5.1 The starting point to the decision on the Appeal is based on whether the proposal accords with the development plan (read as a whole and taking into account the extent to which it is up-to-date), followed by considering whether there are material considerations that would indicate that a different decision should be made.
- 5.2 In this respect I have focused firstly on the following matters in which I consider there to be a clear conflict with the most relevant development plan (and also taking into account national policy).
- i) Impacts on heritage;
 - ii) Impacts on local character (including landscape character);
 - iii) Impacts on the highway network and mitigation measures, including the provision of new / improved pedestrian routes, park and ride facility and public transport services contribution;
 - iv) Spatial strategy / sustainability of location.
- 5.3 Whilst it is acknowledged that some elements of the scheme comply with some of the relevant policies in the development plan, I do not consider it possible to conclude other than the proposal does not accord with the development plan when read as a whole.
- 5.4 I have then gone on to consider whether there are other material considerations which could be considered as having more than limited weight in the planning balance, that could potentially indicate that a different decision should be made, the main ones being:
- i) Provision of housing, including affordable housing;
 - ii) Provision of commercial units (Use Class E);
 - iii) Local employment / economic benefits;
 - iv) Public open space provision, landscaping, and biodiversity net gain.
- 5.5 Having considered all of these points, I then provide my professional opinion on the planning balance, which I hope is of assistance to this Inquiry.

Impacts on heritage

5.6 St Gregory's Church, a Grade 1 listed building, is a focal point for many miles around, and is of historic importance for multiple reasons, including its historic, aesthetic and communal value. The two sites proposed for development are in very close proximity (in contrast to the sites elsewhere in Marnhull which have been permitted recently), and form the major part of its immediate agrarian / countryside setting, which exists despite its relatively central location in the village (this is highly unusual given the size of Marnhull, and is due to its distinctive settlement pattern). The footpaths crossing these fields and those beyond provide many valued views of this relationship and are both historic and well-trod. The development would have a major detrimental impact on the views from those paths and from the surrounding highway network.

5.7 In this context it is relevant to consider the guidance provided by Historic England²⁵, which is referenced in the Appellant's Heritage Statement [CD1.043], as this states:

"Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape."

5.8 I am familiar with the appeal decision relating to site north of Crown Road in Marnhull [CD13.006], in which I participated as the planning witness for Dorset Council. In that case, the site was considerably more distant from the Church, with intervening development, and more closely matches the scenario expressed in the guidance where a site is unlikely to be considered a major component of its setting. However the same cannot be said in this case. The Appellant's assertion that the level of harm would be only slightly above no harm (which is similar to the view of the Inspector in that case²⁶) seems an unrealistic conclusion.

²⁵ Paragraph 14 of The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

²⁶ In paragraph 2- the Inspector concludes that there would be a very small degree of 'less than substantial' harm

- 5.9 Also in the Crown Road appeal the Inspector took into account the views from the top of the tower, in order to consider the heritage harm in that respect, noting that “The layout of Marnhull, it [sic] position within the Vale and its development over centuries can be readily understood from the tower”. Whilst in that case, the proposed scheme was not considered to harm its significance in this respect, as it represented “a relatively small incursion into a broad 360 degree panorama, on the edge of the village”, again the same cannot be claimed in relation to this appeal.
- 5.10 As a designated heritage asset, great weight should be given to its conservation, including its setting (as relevant to its significance), and as a Grade 1 Listed building, this weight must be greatly increased.
- 5.11 In a similar vein, the same points apply to the harm to the setting of the Grade II* Seniors Farm (with the weight increased to recognise its higher heritage value as a Grade II* listing), and Grade II Conyers Place. Both are prominent historical structures that contribute significantly to Marnhull's character and sense of place, the former having clear associative links to the adjoining farmland. Mr Stephen Boyce’s proof also draws attention to the potential impact of the development on the Grade II Orchard House, which would potentially suffer a degree of harm as a result of the change to its setting and relationship across the central field with the St Gregory’s church.
- 5.12 Turning to the Conservation Area, this too is a designated heritage asset, and it is clear from evidence that the two sites proposed for development in this appeal are an integral part of its setting and contribute to its significance. I refer to Section 3 in Mr Stephen Boyce’s proof of evidence that illustrates their importance in the historic character of Marnhull and its settlement pattern – a point specifically noted in Historic England’s response to the application, and appreciated by many historians and by Thomas Hardy himself.
- 5.13 Mr Stephen Boyce’s proof of evidence also adds to the body of knowledge (and significance) in relation to cultural associations with Thomas Hardy and the artist Gordon Beningfield. Marnhull is well known for being the inspiration for the village of ‘Marlott’ in Tess of the d’Urbervilles, and land off Butts Close is thought to be the field Hardy had in mind for the setting of some of the events in that novel, and was used in Gordon

Beningfield's painting that was later published as a cover image on another of Thomas Hardy's publications. This same scene (which can be appreciated from the Hardy Way, south of the B3092, as well as from the highway and footpath entering the field) has not changed significantly, but would be lost almost in its entirety should the proposed development be allowed.

- 5.14 It is my professional opinion that the proposed development conflicts with the approach to conserving and enhancing the heritage assets established in national policy, and which is reflected in NDLP Policy 4. There is no clear and convincing justification made to justify the harm caused to the significance of the designated heritage assets which will arise through the changes made to their setting (taking into account the public benefits that I go on to describe in this section). I have taken on board the proposed demolition of the remaining agricultural sheds, but do not consider this benefit to alter my conclusion. The legal requirements under the Planning (Listed Buildings and Conservation Areas) Act 1990 are also of relevance²⁷.

Impacts on local character (including landscape character)

- 5.15 The development will result in harm to features that are important to the area's local landscape character. This includes the impact it will have on the dispersed, linear settlement form, the much valued views, the loss of tranquillity and appreciation of the dark skies (particularly given the commercial nature of the proposals for land off Church Hill). Whilst a degree of mitigation is proposed, including the retention of the native hedgerows insofar as these are not required for access, and the level of open space that may be included within both developments, and from which views out to the countryside and to the church should be possible subject to securing appropriate public access (albeit not to the extent currently experienced from the public rights of way), this is not considered

²⁷ §66: General duty as respects listed buildings in exercise of planning functions. In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

§72 - General duty as respects conservation areas in exercise of planning functions. In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2) [this includes the Planning Acts], special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

to overcome the degree of harm caused and importance of these spaces to the character of the village.

5.16 Whilst it is debatable whether either site qualifies as a 'valued landscape' as they are not currently identified as such through an adopted policy, the evidence presented as part of this appeal shows that this merits consideration, and their value to local residents is also demonstrated in the evidence underpinning the Neighbourhood Plans' proposals for Local Green Space designation. Should the Inspector agree that either site qualifies as a 'valued landscape', it would be appropriate to give greater weight to this harm, than simply recognising their contribution in terms of the intrinsic character and beauty of the countryside.

5.17 It is my professional opinion that the proposed development conflicts with the natural environment and design policies (NDLP Policy 5 and 24) and Framework, because the development, despite including some mitigation, would fail to retain the features that characterise the area in relation to the distinctive settlement pattern and important views, and because it fails to adequately respond to and reinforce locally distinctive patterns of development, landscape and culture.

Impacts on the highway network and mitigation measures, including the provision of new / improved pedestrian routes, park and ride facility and public transport services contribution

5.18 The evidence provided by Mr. Richard Fitter highlights a wide range of deficits in the Appellant's assessment of the likely impact of the development on the safety of the highway network. I summarise these briefly here.

- i) The assessment significantly underestimates the traffic generated by both sites, and fails to adequately assess the adverse effects of additional traffic on the local highway network (which away from the B3092 is very rural in its character).
- ii) The development is likely to have a material adverse effect on vulnerable road users including pedestrians, cyclists and horse riders, and fails to prioritise walking and cycling as the first choice of travel for local journeys.
- iii) The proposed access onto Schoolhouse Lane (B3092) does not include any footway provision along that road and is unsuitable for safe pedestrian use, yet the development

would inevitably result in pedestrians walking along that link as it will be on the perceived pedestrian desire line, and would offer significant journey time gains compared to the longer route via Butts Close. .

- iv) The swept path analyses demonstrate that the access to the commercial development off Church Hill is not suitable to cater for the predicted increase in service vehicles and customer cars.

5.19 It is acknowledged that the scheme does provide some benefits, but these are limited in their effectiveness:

- i) The Appellant is proposing a contribution towards increasing the frequency of existing bus services and to aid the establishment of a Saturday service, and the provision of pole and flag infrastructure at six bus stops. In the long-term the potential upgrades to the service cannot be guaranteed, and are unlikely to be sufficient to provide a level of bus service that would result in residents having a genuine choice of modes of travel for residents travelling further afield, which is inevitable given the nature of the village with its limited employment opportunities and access to high-order facilities²⁸.
- ii) The plans for land off Church Hill suggest a connection through the school site, but it is unclear how the walking route would be routed or delivered as this is outside the application red line boundary. There are also proposals to divert and surface the existing public footpaths across the adjoining field to provide improved access to Sackmore Lane and Burton Street, but this does not address all of the desired routes, and are unlikely to be suitable for many users in inclement weather or at night. The appeal proposals do not include any new dedicated provision for cyclists.
- iii) The school/church drop-off facility is considered to be of very limited benefit, as in most cases it would be significantly more inconvenient due to its location than the current arrangements (where those travelling to either facility tend to park along or just off New Street, despite the problems this causes).

²⁸ Cllr Turner's proof suggest that this would require a half-hourly service for both of the existing bus routes, including provision into the evenings and across the weekends, and greater coverage (such as to the employment areas at Gibbs Marsh and Rolls Mill, Sturminster Newton).

- 5.20 As a result, the appeal proposals do not sufficiently improve the infrastructure for pedestrians and cyclists to create an environment where walking and cycling would naturally be a first choice, and it is Mr. Fitter's view that the material increase in cars and service vehicles on the existing narrow lanes is likely to further deter some people from choosing to walk or cycle. He concludes that "the appeal proposals do not make the village more sustainable, and have the potential to make it worse."
- 5.21 It is my professional opinion that on these grounds the proposed development would conflict with the policy on grey infrastructure (NDLP Policy 13) which requires the adequacy, availability and provision of transportation infrastructure to be a key consideration, and expects Transport Assessments / Statements submitted by developers to assess the impact of new development on the existing highway network, clarify its consequences and put forward sufficient mitigation, and also with the Framework. Whilst the Framework recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and that this should be taken into account in decision-making, this does not imply that the paucity of sustainable travel options should be dismissed as inevitable. Furthermore, in light of the manyfold harms and uncertainties identified by Mr. Fitter, it is clear that there would be an unacceptable impact on highway safety, and that the effect of the development on the operational capacity of the highway (after mitigation) could be severe, either of which would justify dismissing this appeal on highway grounds, and in any event should weigh heavily against its approval.

Spatial strategy / sustainability of location

- 5.22 As set out in section 4, there are clear reasons why Marnhull is not an appropriate location for housing, retail and commercial development of this scale. For ease, I reiterate the main points from my conclusions from Issue 3:
- i) The spatial strategy seeks to focus significant development at the main towns which have good access to services and employment opportunities, and offer a genuine choice of transport modes, whilst allowing development in locations such as Marnhull where required to meet a local need;

- ii) There is no clear evidence of local need for the proposed development. The existing permitted sites have more than adequate capacity to exceed local housing demand, and there is no clear evidence of demand for the other elements of the scheme.
- iii) The scale of this development (both on its own and cumulatively with the extant permissions) cannot be accommodated without harm to the character of the village, and its heritage assets, as evidenced.
- iv) The cumulative growth of the village at this scale, coming forward as speculative development without the benefit from the forward thinking and planning associated with a policy base either set in the Local Plan (such as was the case for the main towns) or through the Neighbourhood Plan, results in poor and uncoordinated infrastructure planning (both in terms of highways as evidenced in Issue 2, and other infrastructure as highlighted in Cllr Turner's evidence), as well as undermining the plan-led system.

5.23 As a result the development would conflict with the spatial strategy and related policies (NDLP Policies 2, 3, 6, 11, 12 and 20) which together are intended to direct development to the most sustainable locations. Policies 2, 3 and 20 cover both housing and other development, and therefore are relevant to both the housing and employment / commercial elements of the Appeal scheme.

5.24 Whilst the housing numbers have increased and the review of the Local Plan has been delayed, meaning that the housing land supply / delivery tests have on a number of occasions fallen below the required levels, decision-makers have nonetheless continued to give weight to this conflict. They continue to recognise that the strategy remains consistent with the Framework, does not seek to treat the housing numbers as a cap, or to strictly control development immediately outside the settlement boundaries. National planning policy on supporting a prosperous rural economy has not changed significantly from the version in place at the time the Local Plan was examined²⁹, but now includes paragraph 89 which provides greater clarity on the considerations to be applied, and still refers to meeting local business and community needs (rather than wider needs). It is my opinion that these policies remain relevant, given that:

²⁹ a side-by-side comparison of the 2012 and current NPPF versions is available at <https://draftable.com/compare/rIWHqphLkMkS>

- i) they are broadly consistent with the NPPF, focusing development at the main towns which have good access to services and employment opportunities, and offer a genuine choice of transport modes;
- ii) the strategy allows for development in rural areas, to support local needs;
- iii) they do not set out any blanket restrictions on the quantum of development;
- iv) there is still a rationale for protecting the countryside, accepting that, on their merits, applications can and have been approved outside of the settlement boundaries;
- v) the community have made considerable progress in developing a Neighbourhood Plan that has considered local needs for housing, employment and community facilities / services, and has taken into account the most recent housing figures for the Dorset area. Based on my experience in this field I would expect the MNP to be made part of the development plan within the next 12 months (and quite possibly by the end of 2025).

Provision of housing, including affordable housing

5.25 Given the Government's objective of significantly boosting the supply of homes and ensuring sufficient land to come forward where it is needed with the aim of meeting an area's identified housing (which does not imply any form of cap), the provision of housing can be considered as a benefit to which some weight should be given. The Appellant has also agreed to the provision of 40% of the housing as affordable tenures, in line with the requirements of NDLP Policy 8, and has indicated that they intend to provide this on site.

5.26 It is noted that the proposed affordable housing types do not accord with the suggested split set out in the policy, which is based on 70% to 85% being provided as affordable rented and/or social rented housing, but that this can be varied if justified by local circumstances, local needs or local viability considerations. Furthermore, the indicative plans suggest that little consideration has been given to the most up-to-date evidence of local housing need as indicated by Dorset Council's affordable housing register. No evidence has yet been provided by the Appellant to substantiate the proposed mix of affordable housing types.

- 5.27 With reference to the high levels of affordable housing that have been secured and should be built in the area, it is arguable whether on-site provision is necessary to make the development acceptable in planning terms, and therefore whether the planning system can secure its delivery without a unilateral undertaking from the Appellant.
- 5.28 The Appellant has also indicated his intention to look at a variant scheme for 160 homes, and the commencement and delivery of this site may be delayed as a result.
- 5.29 On this basis I do not believe that significant weight can be given to these benefits, and that the degree of weight must be moderated accordingly to take into account these uncertainties.

Provision of commercial units (Use Class E)

- 5.30 The provision of the commercial units (seen by many as creating a new village centre) has the potential to provide an extended range of local services and facilities helping to meet the needs of local residents, and is well placed to serve residents living in the adjoining estate. Such provision is generally considered to be a benefit in terms of increasing the sustainability of a settlement through achieving greater self-containment.
- 5.31 However in this case the proposed convenience store and post office elements are likely to draw some trade away from the existing stores on New Street and Burton Street, and there is no evidence to suggest that these will continue to trade, particularly given that they would not have the advantages of having a good-sized car park, and in the case of the Spar in New Street, do not benefit from linked trips to other shops and services. Nor do they have a more advantageous location to capture passing trade. Their subsequent closure would mean that residents in those parts of the village are less well-placed to access such services. Whilst their potential closure is not a matter that gives rise to any policy conflict in relation to this Appeal, and the planning system is not intended to interfere with market competition, the benefits associated with enhancing the provision of community facilities and services need to be moderated to take the likelihood that this will also lead to closures elsewhere into account.
- 5.32 Furthermore, there is little evidence to justify that a scheme of this nature would be delivered as envisaged, or that it would make the settlement more self-contained. I have

considered the Retail Technical Note provided by the Appellant³⁰, but following discussions with Dorset Council understand that the findings in that report are strongly contested as significantly over-estimating the retained expenditure in the area that would be needed to support development of this scale. Given the catchment area used by the Appellant (which lap up to the edges of Sturminster Newton and Stalbridge) and retention rates proposed (in relation to the scale of offer), Dorset Council's position appears to be well-reasoned. My concerns are further corroborated by the research I have undertaken that indicates that a larger convenience store operator is unlikely to be attracted to this location. It is more credible that many of the shops and services that come forward will simply be relocating from their current locations in and around the village, which would not make any notable contribution to the choice available to local residents.

5.33 I note that the Appellant has referred to the housing as 'enabling development', which suggests concerns over its viability, and that there are no guarantees that the Stalbridge experience referenced in my evidence (where despite evidence of interest in taking forward the office and retail elements of a mixed use scheme, which would help to create a more sustainable settlement, those units have not been built and the site is now being reconsidered for housing) will not be repeated here.

5.34 Based on these points, I would attribute very limited weight to potential benefits in relation to the provision of the commercial units.

Local employment / economic benefits

5.35 It is accepted that the proposals if built would deliver economic benefits through the creation of construction jobs and that future residents occupying the homes would increase spending in the local area. There could also be potential job opportunities created through the take-up of the commercial units, and this would weigh in favour of the development. The extent of these economic benefits has not been quantified by the Appellant, and there are significant uncertainties regarding whether the commercial units will be built and occupied, and, if they are, whether they will provide new jobs, or simply relocate jobs from elsewhere in the local area. I note that the Appellant's Statement of Case has not included

³⁰ Tess Square, Marnhull Retail Technical Note Final Report, October 2023, prepared by Lichfields [CD1.045]

reference to any benefits arising from the commercial elements, nor are any such benefits stated in the Planning Statement that accompanied the original planning application (other than to clarify that the reason the commercial element was made as a full application was “to give the local planning authority and the community comfort with regard to the applicant’s resolve to deliver facilities and services to the village to balance organic growth”).

Public open space provision, landscaping, and biodiversity net gain

- 5.36 The combined scheme will provide a large area of open space to the west of the proposed commercial centre on land off Church Hill, and the applicant also illustrates a range of open spaces within the housing development on land off Butts Close on the indicative plans, suggesting that this would include a LAP play area and a LEAP. It is not entirely clear at this stage the exact extent of any public open space on either site. Whilst the application for land off Church Hill is for full permission, public open space is not specified in the description of the application, and the reference to Informal Outdoor Space in the draft S106 [CD4.009] is imprecise and refers to “an area of informal outdoor space of no less than xxxxsqm in the form of parks and gardens/ amenity green space and/ or natural and semi-natural green space as described within the Fields in Trust Guidance”. The single reference to public open space on the block plan is not linked to the key, and there are anomalies such as land to the north side of the existing hedgerow alongside N47/30 which is not colour coded, and the area currently occupied by the agricultural sheds is hedged off with no paths shown providing access. It is possible that areas of public open space will be considerable in extent, but there is no information to corroborate or quantify this.
- 5.37 The extent to which public open space including play facilities on land off Butts Close, if these are delivered, may be used by the wider the community (as opposed to the residents of the development) will depend on how easy they are to access on foot or by cycle from the surrounding area, raising the issues of pedestrian safety identified in Mr Fitter’s evidence if located towards the eastern side of that site, and as such this should moderate the perceived benefits of such provision.
- 5.38 Given all of these uncertainties, there is no evidence to suggest that these benefits would be substantial.

- 5.39 As part of the proposals the soft work plans indicate that there will also be a significant level of tree planting and other associated landscaping, however much of this is proposed by the Appellant as mitigation in view of the sensitive landscape and heritage context.
- 5.40 Dorset Council's Natural Environment Team have indicated that they are satisfied that the development will adequately avoided, mitigate or compensate for potential effects on the identified ecological receptors, and that an appropriate biodiversity gain is achieved [CD8.017]. The application preceded the Government's statutory BNG requirements coming into effect, and therefore there is no requirement for a minimum 10% uplift to be achieved. The Appellant has not sought to quantify the extent to which the development will provide a biodiversity net gain, simply stating that with "the mitigation and enhancement measures incorporated into the design, the development is considered to have negligible negative ecological effects, as well as some beneficial effects on the ecological value at the site" As referenced in section 3 of this evidence, the loss of native hedgerows appears to be underestimated, but I note that the mitigation³¹ includes a significant element of new hedgerow planting (in excess of 350m, include over 200m of species-rich native hedgerow). On this basis, whilst a biodiversity net gain is clearly a benefit and should attract weight in the planning balance, there is no evidence to suggest that this degree of benefit would be substantial.

Overall Conclusions

- 5.41 It is my professional opinion that, notwithstanding the benefits that would accrue from the proposal, the adverse impacts of the scheme would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole. This would be the case whether or not the benefits over which there are much uncertainty were to be secured to their full extent. The proposal would not therefore be sustainable development.
- 5.42 Respectfully, the Inspector is asked to dismiss this appeal.

³¹ As set out in the Appellant's Ecological Impact Assessment [CD2.003]

Appendix A1. Neighbourhood Plans

The following is a list of plans which I have been substantially involved in preparing / providing advice to the relevant Town and Parish Councils / Neighbourhood Plan groups.

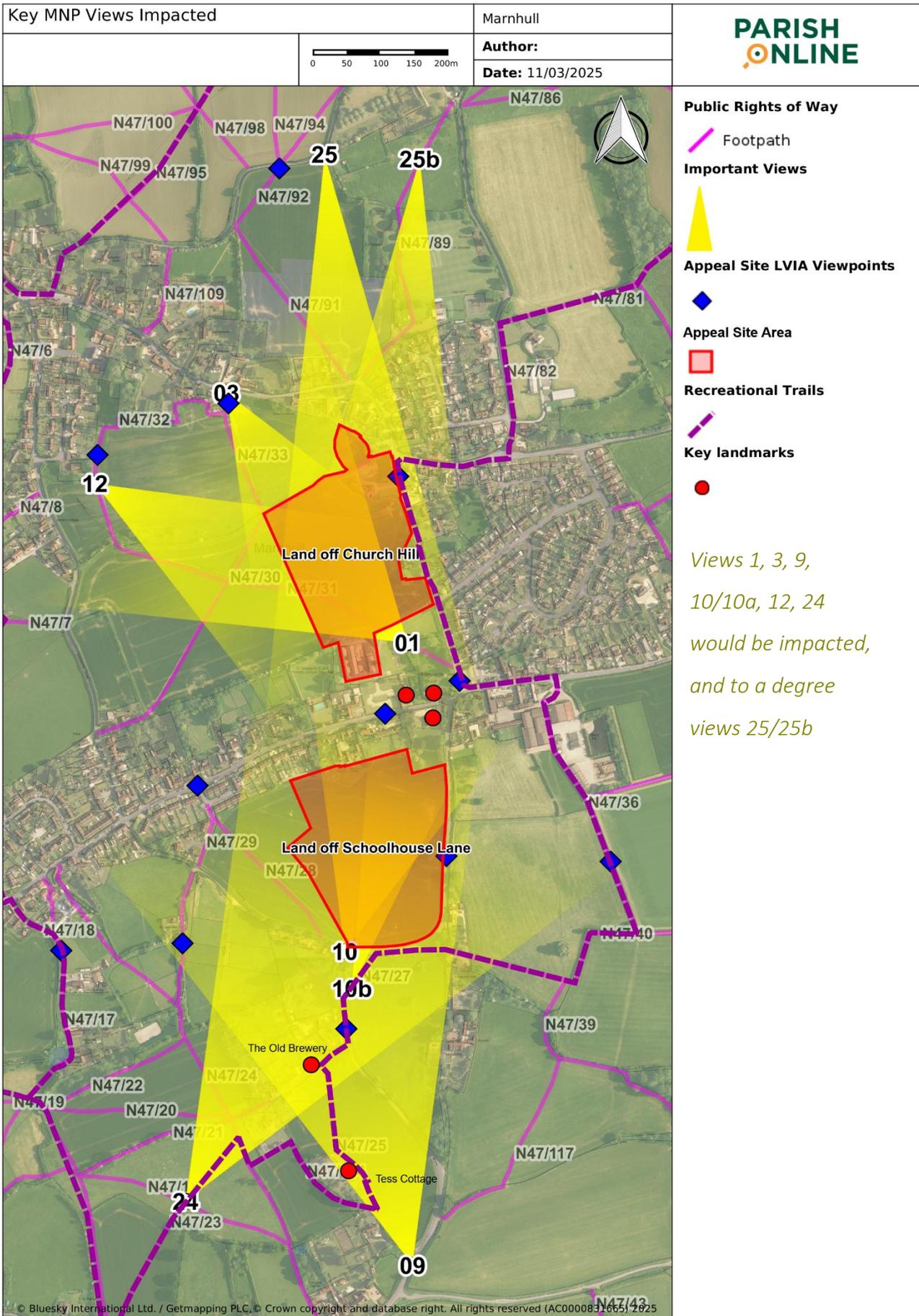
Completed plans:

- | | |
|--|---|
| (1) Alderholt, East Dorset | (18) Motcombe, North Dorset |
| (2) Arne, Purbeck | (19) North Cadbury & Yarlington, Somerset |
| (3) Askerswell, West Dorset | (20) Piddle Valley, West Dorset |
| (4) Broadwindsor Group, West Dorset | (21) Pimperne, North Dorset |
| (5) Buckland Newton, West Dorset | (22) Puddletown, West Dorset |
| (6) Charmouth, West Dorset | (23) Queen Camel, South Somerset |
| (7) Chesil Bank, West Dorset | (24) Shaftesbury, North Dorset |
| (8) Chickerell, West Dorset | (25) Shillingstone, North Dorset |
| (9) Fontmell Magna, North Dorset | (26) Stinsford, West Dorset |
| (10) Gillingham, North Dorset | (27) Sturminster Newton, North Dorset |
| (11) Hazelbury Bryan, North Dorset | (28) Sturminster Marshall, East Dorset |
| (12) Holwell, West Dorset | (29) Upper Marshwood Vale, West Dorset |
| (13) Highcliffe and Walkford, Christchurch | (30) Wareham, Purbeck |
| (14) Hurn, Christchurch | (31) Wincanton, Somerset |
| (15) Loders, West Dorset | (32) Yetminster & Ryme Intrinsica,
West Dorset |
| (16) Milborne St Andrew, North Dorset | |
| (17) Milton Abbas, North Dorset | |

Plans in progress:

- | | |
|---|--|
| (33) Bradford Abbas and Clifton Maybank,
West Dorset | (37) Marnhull, North Dorset (Regulation 14
consultation completed) |
| (34) Burton and Winkton, Christchurch
(Regulation 14 consultation completed) | (38) Lower Winterborne, North Dorset |
| (35) Christchurch Town | (39) Shepton Mallet, Somerset (at
Examination) |
| (36) Knightsford, West Dorset (at
Examination) | (40) Trent, West Dorset |
| | (41) Wimborne St Giles, East Dorset
(referendum to be held 20 March 2025) |

Appendix A2. Views Map

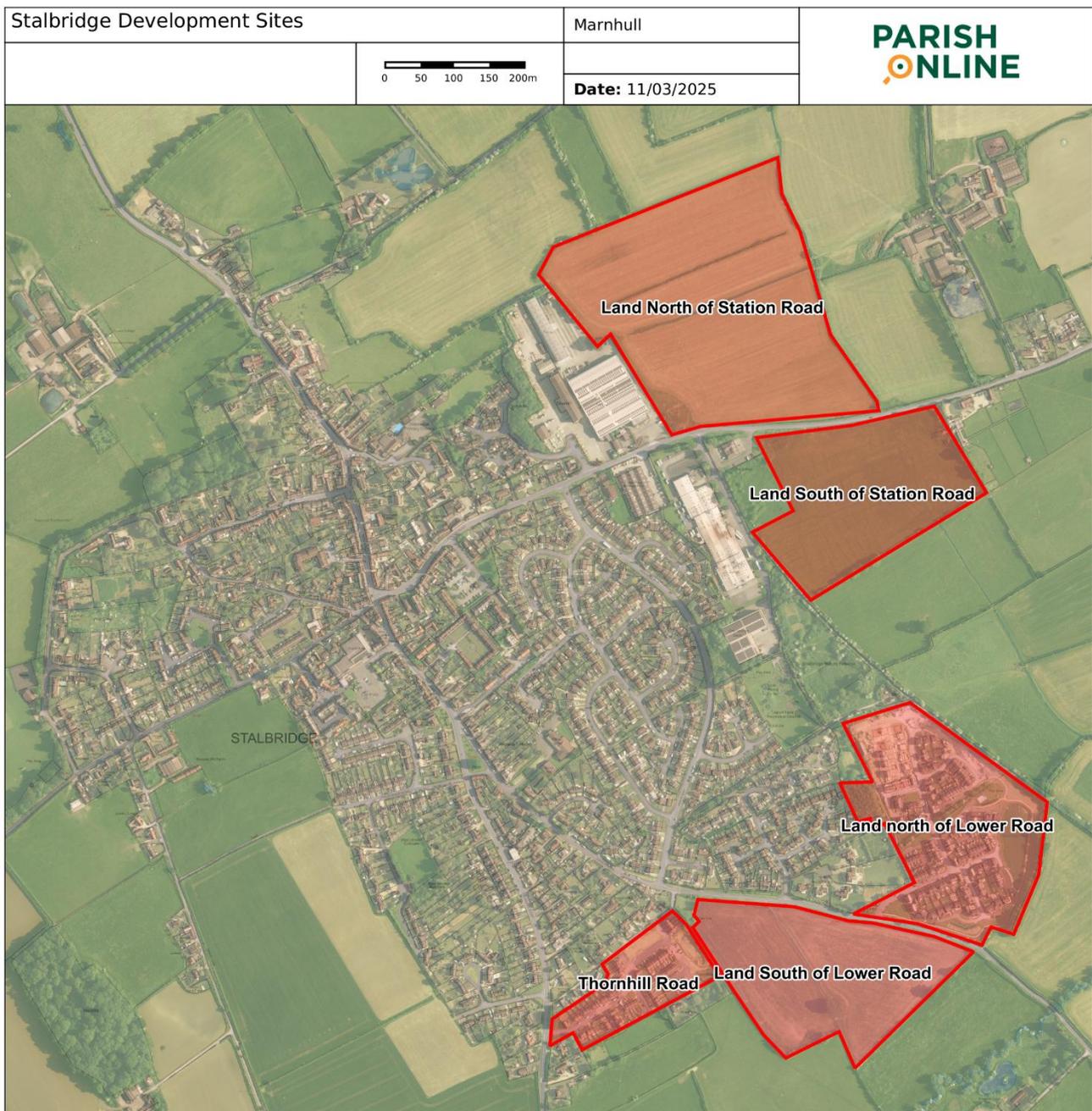


Appendix A3. Stalbridge Map

Appendix 2: North Dorset Housing Trajectory (2011-2031)

Settlement / Source	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
	Completed												5-year supply								
Stalbridge																					
<i>Thornhill Road, Stalbridge</i>											20	40	0	0	0	0	0	0	0	0	0
<i>Land S of Station Road</i>													0	0	0	0	0	0	45	45	40
<i>Land N of Lower Road, Stalbridge</i>											24	36	33	27	0	0	0	0	0	0	0
<i>Land S of Lower Road</i>													0	27	47	40	0	0	0	0	0
<i>Other completions / permissions</i>	4	0	3	1	0	2	5	4	1	6	13	3	12	2	15	0	0	0	0	0	
Stalbridge sub-total	4	0	3	1	0	2	5	4	1	30	69	76	39	29	62	40	0	45	45	40	

Plus Land North of Station Road – 160 dwellings plus land for school, APP/D1265/W/23/3333249, approved July 2024



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Appendix A4. Aldi / Lidl website screenshots

Aldi website <https://www.aldi.co.uk/corporate/property/required-towns> checked and printed
11/03/25



Site Requirements

Our sustained growth means we are continually expanding our real estate portfolio to help achieve our ever-growing goals for 2024 and beyond.

We have ambitious acquisition and development plans and prefer to purchase freehold, town centre or edge of centre sites suitable for development in towns with a population of 15,000 or more. We are willing to explore all opportunities including developer led schemes and existing or new retail units. Our yield profile is increasingly adding value to developments.

	<h4>Site Size</h4> <p>Minimum circa 2 acre site to accommodate a 18-20k ft² unit and 100+ dedicated parking spaces. Note - for London a minimum of 8k ft²</p>	<h4>Main Road</h4> <p>Prominent main road frontage with good visibility and access</p>
<h4>Tenure</h4> <p>Freehold or leasehold</p>	<h4>Footfall</h4> <p>Approximately 15,000 catchment area</p>	<h4>Retail Parks</h4> <p>Retail parks. Minimum area of 18-20k sqft</p>



Town Centre

Either central or edge of centre location



Locality

Minimum of 1.5km from an existing store or potential site for a relocation from an existing store



Contact

If you meet these requirements please get in touch by emailing:

RealEstateAcquisitions@aldi.co.uk

Sites Required - South

SOUTH CENTRAL & HOME COUNTIES

Winchester

Bath

Bracknell

Cheltenham

Dorchester

Oxford

Slough

Banbury

Chesham

Maidenhead

Sites Required - South Wales & South West

SOUTH WALES & SOUTH WEST

Bristol

Penzance

Barry

Plymouth

Swansea

Exmouth

Cardiff

Exeter

Hereford

Ivybridge

Lidl website <https://www.realestate-lidl.co.uk/new-store-site-requirements> checked and printed

11/03/25



[New Store Site Requirements](#) [Store Concepts](#) [Sites For Sale and To Let](#) [Distribution Warehouse Sites](#) [Contact Us](#)



[Main Navigation](#)

[Location criteria](#)

[Download Site Requirements Brochure](#)

Strong in every location

Individuality

We are a strong local supplier in all our locations: our markets are found in classic standalone locations, as well as in retail parks, shopping centres and central locations in densely populated areas. We are always looking for store and warehouse areas as freehold, leasehold and long leasehold opportunities and as well as developed or undeveloped properties.



Always close to our customers

Standalone site

Modern local shopping facilities call for customer-orientated and convenient shopping facilities. Where possible, we therefore provide the most spacious sales areas possible to enhance the customer's shopping experience.



Bringing vitality to Retail Parks

Retail park

Attracting high footfall volumes, we are an asset to retail parks and our customers benefit from being close to other shops.



Urban store expansion calls for flexibility

Central locations

We also want to be close to our customers in densely populated urban areas. Through our stores in central locations, we provide local shopping facilities for the residential population, offering an attractive range of food for customers on foot or through other modes of transport.

Our location criteria

Key figures and requirements

Stores

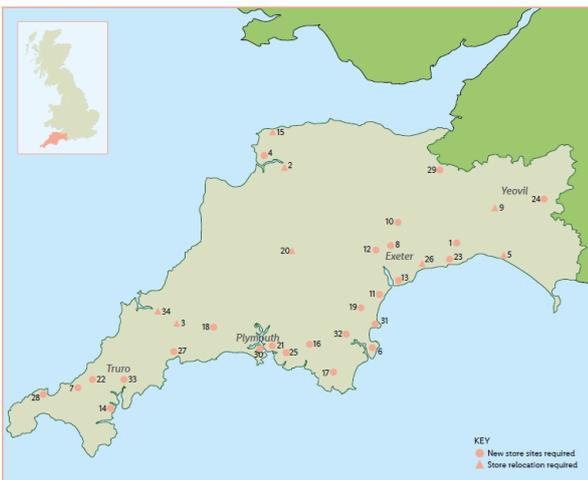
Our flexible store concepts have different development requirements. Together, we can find the right solution for your location and our offer.



Customer parking:	100+ at ground level
Developed or undeveloped properties:	1.5+ acres
Population in the catchment area:	from 20,000
Population of the main centre:	from 5,000
Site area:	18,000 sq ft + (1,672 m ²)

15 Our site requirements in South and West Somerset | Devon | Cornwall

- | | | |
|-------------------------------|---------------------------------|----------------------|
| 1. Aminster | 15. Ilfracombe (rel) | 29. Taunton - North |
| 2. Barnstaple - Newport (rel) | 16. Lydbridge | 30. Torpoint |
| 3. Bodmin (rel) | 17. Kingsbridge | 31. Torquay - South |
| 4. Braunton | 18. Liskeard | 32. Totnes |
| 5. Bridport (rel) | 19. Newton Abbot | 33. Truro - East |
| 6. Brixham | 20. Okehampton (rel) | 34. Wadebridge (rel) |
| 7. Camborne | 21. Plymouth - Mutley/Greenbank | (rel) = relocation |
| 8. Cranbrook | 22. Redruth | |
| 9. Crewkerne (rel) | 23. Seaton | |
| 10. Cullompton | 24. Sherborne | |
| 11. Dawlish | 25. Sidmouth | |
| 12. Exeter - North | 26. Sidmouth (rel) | |
| 13. Exmouth - Central | 27. St Austell - West | |
| 14. Falmouth | 28. St Ives | |

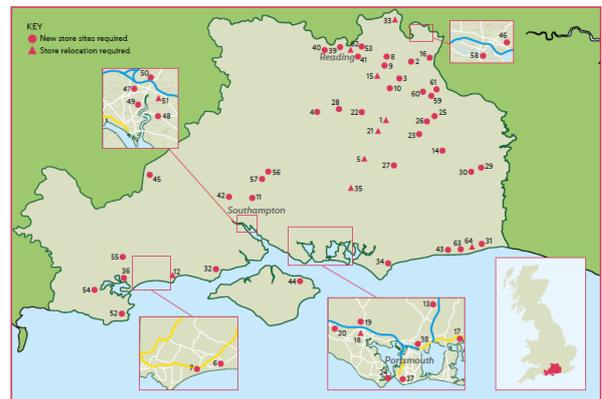


Get in touch.

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 Name: **Rosie Meehan** Tel: 01392 449714 E-mail: rosie.meehan@lidl.co.uk

16 Our site requirements in Central South England

- | | | | |
|-------------------------------|-------------------------------|--|--|
| 1. Aldershot (rel) | 22. Fleet | 43. Rustington | 61. Woking - Sheerwater/
West Byfleet |
| 2. Accot/Sunningdale | 23. Godalming | 44. Ryde (EOW) | 62. Woodley (rel) |
| 3. Bagshot | 24. Gosport - South | 45. Salisbury - West | 63. Worthing - Goring-by-
Sea |
| 4. Basingstoke - Central | 25. Guildford - East | 46. Slough - Langley/East | 64. Worthing (rel) |
| 5. Bordon (rel) | 26. Guildford - South | 47. Southampton - Bassett | |
| 6. Bournemouth - Boscombe | 27. Haslemere | 48. Southampton - Bitterne | |
| 7. Bournemouth - Town Centre | 28. Hook | 49. Southampton - Portswood | (rel) = relocation |
| 8. Bracknell - North | 29. Horsham - North | 50. Southampton - Stoneham | |
| 9. Bracknell - South | 30. Horsham - West | 51. Southampton - Townhill (rel) | |
| 10. Camberley | 31. Lancing | 52. Swanage | |
| 11. Chandlers Ford | 32. Lynton | 53. Twyford | |
| 12. Christchurch - East (rel) | 33. Maidenhead (rel) | 54. Wareham | |
| 13. Cowplain/Horndean | 34. Pagham | 55. Wimborne | |
| 14. Cranleigh | 35. Petersfield (rel) | 56. Winchester - Town Centre/Easton Lane | |
| 15. Crowthorne (rel) | 36. Poole - Centre/Parkstone | 57. Winchester - West Badgers Farm | |
| 16. Egham/Virginia Water | 37. Portsmouth - Central/West | 58. Windsor | |
| 17. Emsworth | 38. Portsmouth - Farlington | 59. Woking Central | |
| 18. Fareham (rel) | 39. Reading - Caversham | 60. Woking - Goldsworth Park/Knaphill | |
| 19. Fareham - North | 40. Reading - Tilehurst | | |
| 20. Fareham - Segensworth | 41. Reading - Winnersh | | |
| 21. Farnham (rel) | 42. Romsey | | |



Get in touch.

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