

Marnhull Parish Council (“MPC”) response as Consultee to planning application:

P/OUT/2023/02644

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.

The application is an unusual one in that it is a hybrid application comprising outline planning permission for a housing development and full planning permission for a commercial development on separate sites. The rationale for this approach is not explained. We will therefore document our comments on each of the two elements and then summarise our **OBJECTION** to the overall application.

Butts Close development

Objection 1 – Contradicts key policies of North Dorset Local Plan 2016

This application contravenes many of the key policies adopted in the North Dorset Local Plan 2016, specifically those around the Council’s spatial strategy that looks to focus major growth at the more sustainable towns, reduce the need to travel and protect the countryside (Policies 2, 3, 6 and 20). Given extant approvals for housing in the village, and other applications currently subject to appeal with the Planning Inspectorate, there can be no justification that there is an overriding need for this further development to be in the countryside nor can it be argued this is meeting an essential rural need.

During the plan period (2011 – 2031) to date there have been 266 dwellings approved in Marnhull of which 67 have been completed (c. 30% growth in dwellings in the plan period). There are also other developments currently at appeal which could significantly increase this total.

This is not what the Local Plan envisaged. The level of housing growth for Stalbridge and the larger villages set out in the Local Plan was based on 825 dwellings over the 20 years from April 2011 - a level of growth based on anticipated local needs. Extant approvals provide for 65 affordable dwellings which far exceeds local needs set out in the Housing Register.

A much higher level of growth was directed to the main towns, and each town had a specific policy setting out the infrastructure requirements needed to accompany that higher growth. No such exercise was undertaken for Stalbridge or the larger villages, as the amount of additional housing was relatively low - split proportionately (based on settlement size) this

would equate to about 80 – 90 dwellings in Marnhull. Much of the additional housing in Marnhull that has been approved was because of the district-wide shortfall in housing at that time, but this is no longer the case. We respectfully ask Dorset Council if this is sustainable or desirable to add to this high level of growth in the absence of any real review of the need for new or improved infrastructure to support it in this location.

We have objected to several large applications previously based upon non-compliance with the North Dorset Local Plan and we are sure that Dorset Council planners are fully aware of each policy so rather than labour these points we would like to focus on two other significant issues, namely heritage and landscape impact and transport/highways safety.

Objection 2 – Heritage and Landscape Impact

We would like to draw Dorset Council's attention to a previous application at Butts Close - 2/2018/0488/OUT. This application initially sought permission for 74 dwellings on 4.6 hectares of land off Butts Close (the eastern part of this site) which was subsequently reduced to 58 dwellings on 3.05 hectares in amended plans that were intended to address the comments received from the Council's Conservation and Landscape Officers. However, Dorset 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, and the planning application was withdrawn. This clearly indicates the greater and unacceptable degree of harm from the proposed development that is substantially larger than the 39 dwellings that have been approved on this site, encroaching far more upon many of the heritage assets that the earlier application was deemed to harm, and having a much greater impact on the character of settlement.

The Local Plan states *"Clear and convincing justification for any development that would cause harm to the significance of a designated heritage asset will be required however slight and whether through direct physical impact or by change to its setting"*. (NDLP Policy 5). It also requires that the landscape features that characterise the area are retained (NDLP Policy 6)

The applicant acknowledges the proposal will result in harm to designated heritage assets (without considering the importance of the Conservation areas as a whole) whilst applying a rather subjective measure of this harm on a scale of 1-10. In relation to landscape features, the applicant contends that there are no quality landscape features that would be lost. Given the significance and prominence of the key cluster of listed buildings – Grade I St Gregory's Church, Grade II* Senior's Farm and Grade II Old Rectory (Conyers Place) – this is in our opinion inadequate and unrealistic.

It is also our opinion that the heritage value of the two Conservation Areas in Marnhull is unique, should be protected, and is to a large degree derived from the settlement pattern and close relationships with the surrounding farmland. The village is built upon several "hamlets" in a polyfocal manner which still reflects Marnhull's ancient settlement pattern. The agricultural land between the Conservation areas off Church Hill and at Butts Close is a major contributor to this setting, and this point was made by the Council's landscape officer

in relation to the 2018 planning application, who commented that the proposals would not maintain the undeveloped character of this sensitive hillside location, and in particular the ribbon settlement pattern of Marnhull in this area (which is visible from the wider area).

This point was also noted by the Area Planning Officer when first designating the conservation areas – *“an open area in the middle without which the village character of the separate sections would disappear”*¹.

Our view is also supported in two of Dorset Council’s own technical supporting documents and a previous conclusion made by Dorset Council planners. The LUC Report *“Strategic Landscape and Heritage Study for North Dorset Area”* published in October 2019 which specifically noted the landmark views, including views to the church tower, the particular character of the settlement form and the overall rural and tranquil character of the surrounding area.

Even the indicative layout at Butts Close highlights the applicant’s inability to reflect the unique character of the village. It has created an inverse of the linear settlement pattern with the insertion of linear parks, and introduces many disconnected, cul-de-sac housing clusters that have very regimented, regular plot patterns completely uncharacteristic of the historic nature of the village.

The second technical supporting document is the Strategic Housing Land Availability Assessment published in 2020 and subsequently updated in 2021. SHLAA LA/MARN/002 for Land at Butts Close concluded that development could undermine the setting of the conservation area and of listed buildings and was deemed unsuitable for development.

Based upon this weight of evidence, we respectfully suggest that again the benefits of 120 further dwellings do not outweigh the harmful impact on the landscape and the setting of heritage assets, including the conservation area. This is sufficient justification for rejection of the application on its own.

Objection 3 – Transport and Highways Safety

The Local Plan stipulates that new development should be located to *“facilitate cycling, walking and the use of public transport”* whilst the Dorset Council Local Transport Plan states development should *“minimise the impact of the private car by reducing the need to travel”*. The Transport Study provided as part of the application attempts to make the case that *“the surrounding area benefits from good pedestrian and cycle routes available within near proximity to the site, as well as public transport links”* and concludes *“this Transport Statement has demonstrated that the proposed development will not have a significant impact on the operation of the local highway network”*.

¹ Dorset County Council Memorandum 20 August 1969

Whilst it can be appreciated that the applicant’s consultants need to attempt to demonstrate compliance with planning objectives little in the application demonstrates any real understanding of the rural nature of Marnhull and the very real highway safety issues experienced daily by residents and which this application will exacerbate. (Issues which were drawn to the attention of the Dorset Council Highways team when they met with our Neighbourhood Plan representatives on 18 October 2023.)

There are very few employment opportunities within the village, which will mean that most people in employment moving to the proposed Butts Close development will work some distance from their home. The bus service is poor and not a realistic option given the sporadic and limited nature of the timetable, there are no safe cycle routes, so this increases the need for people to own and use their car to get to and from work.

The TRICS modelling presented to support the Butts Close element of the application is based upon edge of town scenarios. These are not reflective of a rural village where households rely more on car travel and typically have two cars per household. This is clearly illustrated by the TRICS model estimating that over 16% of people will walk to work, whereas the 2011 Census data for Marnhull showed just 6% walking to work, and similarly indicating a much lower level of car sharing as the indicative baseline.

Method of Travel to Work	Marnhull	
Underground, metro, light rail, tram	1	0.1%
Train	12	1.7%
Bus, minibus or coach	6	0.9%
Taxi	0	0.0%
Motorcycle, scooter or moped	4	0.6%
Driving a car or van	571	83.0%
Passenger in a car or van	40	5.8%
Bicycle	7	1.0%
On foot	41	6.0%
Other method of travel to work	6	0.9%

As such, assumptions on trip generation are likely to have significantly underestimate the transport impacts of the scheme as indeed is the case with existing approved applications.

The proposed new junction on Schoolhouse Lane will also create major highway safety issues. The lived experience in Marnhull is that the B3092 is a very busy road, carrying significant volumes of traffic including heavy vehicles. It is essentially an unlit, narrow rural road with blind bends very near the proposed junction, including the dangerous New Street junction by St Gregory’s church. Having traffic leaving a residential development onto this road cannot be a serious suggestion. We believe that it will be dangerous to have increased traffic accessing the development from the Butts Close/New Street junction (even considering the existing permission for 39 homes). New Street is not a main road and is extremely busy. We also believe that this will result in Chippel Lane ending up as a “rat run” which will be very dangerous given the nature of this narrow, rural lane.

The application also emphasises the expectation that residents will walk and cycle a great deal around the village and makes statements such as Butts Close is a “*comfortable 1 mile walk to the village Post Office in Burton Street*”. That is simply not reality. The village is a dispersed settlement joined by narrow lanes that were not designed for motorised transport. The “*comfortable walk*” referenced above necessitates walking along Sackmore Lane, a single track road with no pavements, few passing places, high hedges, and of course, no streetlighting. The roads disingenuously described as main roads in the application (New Street and Church Hill) do not have pavements along the whole length either which would make walking from Butts Close to Tess Square a perilous undertaking.

The application, in trying to justify public transport connectivity calculates that it is possible to cycle to Gillingham Station in 39 minutes. We respectfully ask Dorset Council’s planning team to give this a try on a wet, dark, winter’s morning and see if it is a realistic (and safe) option!

The final point in terms of sustainability of the application from a transport perspective relates to the planning approvals already in place. Developments off Burton Street and Crown Road will add significant volumes of traffic to the already congested village lanes, a fact that is entirely ignored in the analysis by the applicant’s team. We ask that Dorset Council considers the cumulative impact of all the proposed developments.

In summary we do not believe this development can offer a genuine choice of sustainable transport modes, considering the paucity of public transport options, lack of safe or segregated cycle routes and lack of safe and attractive pedestrian routes along the unlit, narrow, rural lanes within our village. The Local Plan states in Policy 13 that the adequacy of the transport infrastructure will be a key consideration when planning applications are considered. Our contention is that this development will cause significant safety issues, particularly for residents of all abilities that walk to facilities in the village (whether living in this development or elsewhere in the village), and this application should be refused on these grounds.

Tess Square development

Objection 1 – Contradicts key policies of North Dorset Local Plan 2016

As with the proposal for Butts Close, the full application for Tess Square also contravenes many of the key policies adopted in the North Dorset Local Plan 2016. The Plan only contemplates significant retail development in the large towns, rather than a large, destination type development in a village setting. Our assumption from the Plan is that retail development in a village would need to be justified based upon a local need (Policy 2), and this need should be an ‘overriding need’ given that the site is outside the defined settlement boundary (Policy 20). There are two convenience stores in the village that could well close because of this development, and larger stores at Sturminster Newton, Stalbridge

and Gillingham where local jobs are based. We therefore question whether there is a need for such a development in Marnhull outside the settlement boundary and on a site that comprises an important setting for heritage assets and the essential rural character of the village.

Objection 2 – Deliverability and Viability

The development proposed, whilst architecturally elegant, is of a very large scale and disproportionate to the local, rural needs. We question the viability of such a large supermarket given the extant facilities existing in the local area. The applicant has not provided any evidence that a supermarket retailer has expressed any interest in the site, which is not on a main thoroughfare or in a town and therefore unlikely to be of interest to a national operator.

The application also proposes five Class E premises. We note that similar premises at the Exchange in Sturminster Newton have remained empty for many years despite the larger catchment area, and that several similar premises have closed in Stalbridge in the last few years. Whilst we recognise the retail outlets suggested were merely suggestions, we would argue that the area is well served by vets, undertakers, hairdressers, estate agents and dentists and again we question the viability and deliverability of these as part of this application. To support this argument, on a local level, we have the medical centre on the same site and that has also proven not to be viable. It is open only two mornings per week with very limited services offered. It is quite feasible that, having failed to find prospective users, the 'loss' of such facilities to housing would then be possible under Policy 27 of the Local Plan.

Objection 3 – Transport and Highways Safety

Tess Square is a large sized development. To be viable, the supermarket will need to generate significant turnover, requiring high numbers of visiting traffic and goods vehicle movements all through one existing entrance onto Church Hill.

The application demonstrates that it is possible for goods vehicles to enter the site: *“The proposed commercial development access measures 5.2m in width with 9.0m radii to the north and 8.8m radii to the south, including 6.0m aisle widths and internal carriageways within the commercial parking. This provides suitable geometries for a variety of vehicles to access, manoeuvre and egress including private vehicles, 7.5t box van and HGVs”.*

However the application does not discuss how they will actually get to the site from outside of the village. Church Hill, Burton Street and Sodom Lane/Pilwell are the three options. All are narrow rural lanes (not main roads as described in the application). All have pinchpoints, there are limited or non-existent pavements and they are already busy with local traffic including school buses, farm traffic, pedestrians, cyclists and horse riders. The junction in front of Tess Square (opposite Cooks Garage) is already a congestion hotspot and that is

without extant applications at Burton Street and Crown Road being built out which will increase traffic by c. 20%.

The proposed development is far larger than can conceivably be needed by Marnhull and this is justified in the application by reference to it being a “*destination*”. It is reasonable therefore to assume that significant additional traffic will result from outside the village if the development is to be viable.

The application also emphasises that many residents will walk to Tess Square enhancing its sustainable credentials. The roads leading to the pedestrian entrance are all relatively narrow and do not have continuous footpaths so we do not agree that the development will promote walking. If you consider the demographics of Marnhull (39% of residents are over 65) and combine this with the lack of safe pedestrian routes it is our contention that most trips will be by car, so that car journeys will be far higher than assessed in the application. Lived experience shows that unsafe roads discourage pedestrians and cyclists so that people turn to their cars for even very short journeys.

In summary again we do not believe this is a sustainable development, considering the paucity of public transport options, lack of safe or segregated cycle routes and lack of safe and attractive pedestrian routes along the unlit, narrow, rural lanes within our village. Our contention is that this development will cause significant safety issues, particularly for residents of all abilities that walk to facilities in the village (whether living in this development or elsewhere in the village), and this application should be refused on these grounds.

Our Parish Consultation Process

As this application is seismic in terms of the impact on our village, we took the opportunity to ask Dorset Council for an extension to the timeframe for Consultee response so we could take the opportunity to consult widely in Marnhull. We conducted a very well attended Parish Meeting on 4th December where the audience was overwhelmingly against both proposals. Seeking to gain the views of a broader proportion of the village, we have also conducted a questionnaire as part of our developing Neighbourhood Plan. The questionnaire was delivered to every household in the village and was advertised widely.

We were very pleased to receive a total of 502 responses demonstrating the strength of feeling within the Parish about the future of our village. Two questions related to this application to determine whether there is a perceived need for (a) Tess Square and (b) further housing development:

- *Do you think it would be a good idea to have a larger food store and other commercial units in a “new” village centre location?*
- *Would you support having further housing (over and above that which has already been permitted) if it could help secure a larger food store and other commercial units in a “new” village centre location?*

The results were as follows:

- Over 68% of respondents thought the food store was not a good idea whilst 10% did not have a strong opinion. Only just over 21% were supportive.
- Only 8% of respondents supported the Butts Close development whilst 86% were opposed to it with 6% having no strong opinion.

This demonstrates that, contrary to the views in the application, there is little perceived need or desire for additional retail provision in the village and even less for further development to pay for it.

Summary

MPC has set out above objections to the proposals for Butts Close and Tess Square. We are not against development and evolution of our village, but these proposals are disproportionate and cannot be justified in any sense based upon local need. The heritage and landscape impact clearly outweighs the benefits, and the proposals will create huge highway safety issues if approved. The disproportionate nature of the application which leads us to question viability and deliverability, the heritage impact and the highway safety issues are each a reason for rejection of the proposal. When combined with the results of the local questionnaire cited above there can be no justification whatsoever for Dorset Council to grant permission for this proposal.