

Melbury Abbas and Cann Neighbourhood Plan

Responses to the Regulation 16 consultation

3 June 2025

The Regulation 16 consultation was held between 11 April and 30 May 2025 (7 weeks). Ten responses were received during this time, as detailed in the table of contents below.

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Representation number: 3	Historic England / D Stuart	28 May 2025
Representation number: 4	Environment Agency / B Sherrard	29 May 2025
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Representation number: 7	Cranborne Chase National Landscape / R Burden	28 May 2025
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Representation number: 10	Dorset Council / P Reese	30 May 2025

Representation number: 1

From: Gaynor Gallacher, Assistant Spatial Planner

Organisation: National Highways

Submitted: 16 April 2025

Method of submission: Email

Comments:-

Thank you for providing National Highways with the opportunity to comment on the submission version of the Melbury Abbas and Cann Neighbourhood Plan. As you are aware, National Highways is the highways responsible for operating, maintaining and improving the strategic road network (SRN) which in this location comprises the A303 and the A35/A31 corridor which pass approximately 15km and 30km to the north and south respectively of the plan area, connected by the A350 which bisects the parishes.

Having reviewed the submitted plan we consider that the Plan's proposed policies are unlikely to lead to a scale of development that will adversely impact the safe and efficient operation of the SRN and we therefore have no specific comments to make. In general terms, we will of course continue to engage with Dorset Council with regards to the emerging Local Plan and associated transport evidence base, to identify the highways impacts and any necessary infrastructure requirements for potential growth sites.

These comments do not prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.

Representation number: 2a (NP)

From: Rosalind Tuck, Higher Officer

Organisation: Natural England

Submitted: 1 May 2025

Method of submission: Email

Comments:-

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this neighbourhood plan.

I can confirm that Natural England have no objection to the proposed Neighbourhood Plan modifications. It would be appropriate for a conclusion of no adverse effect on the integrity of the designated habitats and International sites to be reached

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may

be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://theassociationoflocalenvironmentalrecordscentres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds,

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Representation number: 2b (HRA)

From: Rosalind Tuck, Higher Officer

Organisation: Natural England

Submitted: 1 May 2025

Method of submission: Email

Comments:-

Screening Request: Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that significant effects on Habitats Sites are unlikely.

The proposed neighbourhood plan is unlikely to significantly affect any Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland.

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended). The Neighbourhood Plan proposals should also be screened to ascertain whether Strategic Environmental Assessment is necessary. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the planning practice guidance.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the Planning Practice Guidance.

This identifies three triggers that may require the production of an SEA:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's standing advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Representation number: 3

From: David Stuart, Historic Places Adviser

Organisation: Historic England

Submitted: 28 May 2025

Method of submission: Email

Comments:-

Thank you for your Regulation 16 consultation on the submitted version of the Melbury Abbas & Cann Neighbourhood Plan.

In our response to the Regulation 14 and previous consultations we drew attention to the need for evidence to demonstrate that proposed site allocations could be delivered without causing harm to heritage assets in accordance with overarching national and local policy for the protection and enhancement of the historic environment (see attached).

We were previously reassured that the involvement of your authority's conservation team had ensured that this policy requirement could be satisfied.

We would therefore advise at this stage that confirmation be sought from that team, to whom we would be happy to defer, as to the acceptability of those site allocation policies, and the Plan generally.

There are no other issues associated with the Plan upon which we wish to comment.

Philip Reese

From: Thompson, Alan [REDACTED]
Sent: 08 May 2022 20:12
To: maandcnp@gmail.com
Cc: Sam Williams; Philip Reese; James.Weir@dorsetcouncil.gov.uk; Stuart, David
Subject: Melbury Abbas and Cann Neighbourhood Plan - Regulation 14 Consultation - formal response

Dear MA&CNP38 Steering Group,

Thank you for your Regulation 14 consultation on the draft Melbury Abbas and Cann Neighbourhood Plan (01 April 2022). We commend the Neighbourhood Planning Group for the hard work and dedication required to arrive at this point in the planning process.

I note that my colleague David Stuart's previously expressed concerns in his initial SEA Screening response (7 September 2020 to Philip Reese at Dorset Council). At that stage, we were worried that the various site allocations were not adequately supported with evidence to reassure us that local heritage assets would not be at risk of harm.

I also note that following an intervention by the local authority conservation office, David was reassured that activity was underway to update the Plan, providing the required supporting evidence and justification for the various site allocations. In David's words; "We are also pleased to note that the findings of the site assessments carried out by your conservation officer have prompted the community to modify the Plan to accommodate his recommendations for the protection and enhancement of heritage assets in accordance with overarching national and local policy." (from David Stuart's email to Sam Williams at Dorset Council 29th April 2021).

Given these positive recommendations, we would urge the conservation officer at Dorset Council to reassure themselves that the required changes have now been made to the draft Neighbourhood Plan. Such changes should provide an evidence-base and a rigorous justification to support development in each of the allocated sites. This would ensure the protection and enhancement of heritage assets in accordance with overarching national and local policy. Apart from this, we have no further comments to make at this stage.

We hope that our comments have been helpful and look forward to having the opportunity to comment further on the progress of the plan at the Regulation 16 consultation stage. We wish the neighbourhood planning group well with their ongoing work.

Kind regards,

Alan

Alan Thompson | Historic Places Adviser

Historic England | South West

1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ

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<https://historicengland.org.uk/southwest>

Representation number: 4

From: Bob Sherrard, Planning Advisor

Organisation: Environment Agency

Submitted: 29 May 2025

Method of submission: Email

Comments:-

Thank you for consulting the Environment Agency on the Melbury Abbas & Cann Neighbourhood Plan.

Currently we are focussing our detailed engagement on areas of our work which pose the greatest environmental risk and/or opportunities. There are environmental constraints within our remit in the plan area, however we have no detailed bespoke comments to make at this consultation stage.

Please notify the EA of the local planning authority's decision under Regulation 19 in relation to the neighbourhood plan.

Representation number: 5

From: Janet Davis

Organisation: The Ramblers (Dorset Area)

Submitted: 26 May 2025

Method of submission: Online portal

Comments:-

The Ramblers fully supports the objective of policy 4a (sustainable transport) to encourage sustainable transport links through accessible and safe rights of way.

Links into Shaftesbury are particularly important and measures to avoid walkers, horse riders and cyclists having to share roads which have no footways with motor traffic should be investigated.

The plan appears to make no mention of the White Hart Link, a 50 mile (80 km) walking route which links five market towns in north Dorset and the villages between (see here: <https://www.whitehartlink.uk/>). We suggest that the Neighbourhood Plan should refer to and support this initiative which is intended to promote associated projects in the areas of health, education, heritage, art and tourism.

The Ramblers would be happy to discuss any rights of way matters with the Parish Council.

Representation number: 6

From: Sybille Maddock (Interim Town Clerk)

Organisation: Shaftesbury Town Council

Submitted: 27 May 2025

Method of submission: Online portal

Comments:-

Shaftesbury Town Council would like to commend Melbury Abbas & Cann Parish council on successfully reaching this stage in the development of their Neighbourhood Plan. We know well the enormous amount of work involved in producing such a document. We wholly support this plan and consider it well written, thoughtful and very informative. As a neighbouring parish, it was very interesting to gain a greater understanding of our nearest outlying villages concerns and challenges, together with its strengths and clear aspirations for its future.

Representation number: 7

From: Richard Burden, Principal Landscape & Planning Officer

Organisation: Cranborne Chase National Landscape

Submitted: 28 May 2025

Method of submission: Email

Comments:-

Thank you for consulting Cranborne Chase National Landscape at the Regulation 16 stage of this Neighbourhood Plan.

CCNL encourages its communities to take the NP opportunity to have some control over their areas where those communities have the resources and energy to see the NP processes through to conclusion. I shall try to keep my comments to matters where CCNL particularly supports the NP, can help with sharpening up the wording, or where we have significant concerns that should be addressed.

Although government has not formally adjusted the change of name to National Landscape across all the legislation, now that it has been changed in the NPPF it would make sense to use it throughout the NP. Clearly NPPF 187, 189, and 190 are relevant to an NP which is partly within this NL and partly in the setting of it.

It is probably relevant to draw attention to the amended duty under s.85 of CROW Act 2000. That applies to all relevant authorities, which include LPAs and Parishes, and they now must seek to further the purposes of National Landscape designation when making any decisions that affect land in a National Landscape. Making a Neighbourhood Plan would be such a decision.

The Environment and Landscape Topic Paper helpfully describes views, but the plan only shows viewpoints. That is repeated in the NP, Figure 46, and has limited utility. In my experience, it is important to show view lines if the views are to be protected and carry weight in decision making. It is also helpful that some views are identified as 'to' and 'from', tying in with guidance in the NPPG, whilst others are simply 'to', but they do need to be shown visually on a plan / map. Despite the note on page 44 of the NP, I have not found the detailed vistas in the Topic Paper.

There do appear to be some textural and layout issues in the NP but I will only comment where there is confusion or lack of understanding. For example, Fig 9 shows isolated green

areas that are obviously not in this NL, there are 2 different red items in the key, and the yellow Village Hall site does not appear. In para 55 what does 'these two' refer to ?

CCNL supports the thrust of Policy 1a, promoting brownfield sites, and Policy 1d, recognising the acknowledged need in and around this NL for affordable housing.

Nevertheless, CCNL is very concerned that sites either side of the B3081 at Southbank Farm and south of Melbury Motors are being put forward for development when previous proposals at these sites have been turned down. The assertions about landscape mitigation 'over time' are inadequate and unacceptable in, and within the setting of, a nationally important and nationally designed National Landscape. Furthermore, both sites are 'greenfield'. The possible provision of a new Village Hall at Southbank Farm is not adequately safeguarded and the proposed parking area appears rather small. CCNL cannot support Policies 1f and 1g, and strongly recommends that the NP Group reconsider those allocations.

Policy 1h lacks logic because at the outset it is stated that 'the Village Hall is not located in an area that is easily accessible' and proposing a relatively inaccessible site that is some distance from community services for affordable housing does not make it a sensible location for those with limited resources.

Although Figure 23 refers to Ancient Woodland sites, none are actually shown on the plan or its key.

Para 111, the purpose of National Landscape / AONB designation is to 'conserve and enhance natural beauty'. It would probably be better to state that rather than paraphrase what a NL is.

14.1.7. Biodiversity and ecosystems: It is probably appropriate to note that CCNL is consulting on its Nature Recovery Plan and the NP could consider how to link with that. Furthermore, in relation to tree cover and tree planting, CCNL has recent guidance 'Right Tree Right Place' [Right Tree, Right Place - Cranborne Chase National Landscape](#)

14.1.8. Agriculture: CCNL welcomes the focus on the location of higher quality farmland within the NP area. A major challenge is how to improve the wildlife habitats whilst maintaining the productivity of those areas.

Policy 2c. Protected Views and Vistas: Whilst the supporting text includes helpful plans and photographs that could, with benefit, be introduced earlier in the NP, para iii) seems to assume impacts can be mitigated, which is not necessarily feasible, appropriate, or acceptable. Furthermore, the policy does not adequately cover the sequential processes of

avoid, mitigate, compensate. That part of the policy should, I recommend, be redrafted. It could have two elements, one relating to protecting views and vistas generally, and the second relating more rigorously to the protection of the identified views / vistas. That part of the policy should include avoiding development which impacts adversely on the view / vista, achieving mitigation swiftly which itself is not intrusive or harmful, and the provision for compensation for impacts which cannot be avoided or quickly mitigated, and where the development is deemed necessary.

Enterprise: para 150; change 'where possible' to 'always' recognising the need to be sensitive to the Cranborne Chase National Landscape and surrounding rural character.

16.1.14. Preserving our Dark Skies: CCNL has been an International Dark Sky Reserve, the 14th in the world, since October 2019 so the text in this section is a bit out of date. Policy 4g is separated from its supporting text by many pages, 63 to 72, so I strongly advise that supporting text and policies are brought together for each of the topics in section 16 rather than the current situation where many topics are discussed and then some 10 or so pages later all the policies are set out. The obligation to reduce light pollution year on year is not explicitly mentioned, neither are Environmental Lighting Zones which bring together the more detailed criteria for good lighting in sensitive locations. We have produced draft policies and supporting reasons for IDSR compliant lighting [attached], and I am confident our Dark Skies Advisor would be happy to assist in redrafting the supporting text and policies for Dark Skies.

16.10. Policy 4i. Local Green Spaces: My understanding is that Melbury Wood is one of the few areas of Common Land in this NL and as such is a particularly important Green Space that could be identified within the NP. That is in addition to designated Open Access Land. Figure 65 would be clearer if only Open Access Land and Common Land are shown rather than different shades across the whole area.

16.1.15. Transport and Road Safety: paras 172 to 186 set out the complex situation. Nevertheless, it would be helpful to update the data to the current time. It would also be helpful to include the decision of the assessment of the M4 to Dorset coast route not to progress with the A350 / C13 corridor. It is frustrating that in a National Landscape it is not feasible to encourage walkers and cyclists to use many of the roads in this NP area owing to the quantity of motorised traffic, and it does not seem sensible for the Highway Authority to direct HGV traffic onto C Class roads with obvious and known bottlenecks.

Whilst the concept of a 'walkable parish' is laudable, Policy 4a, it does seem that issues with volumes and size of motorised vehicles are going to militate against many of the routes linking up where they have to use the highways.

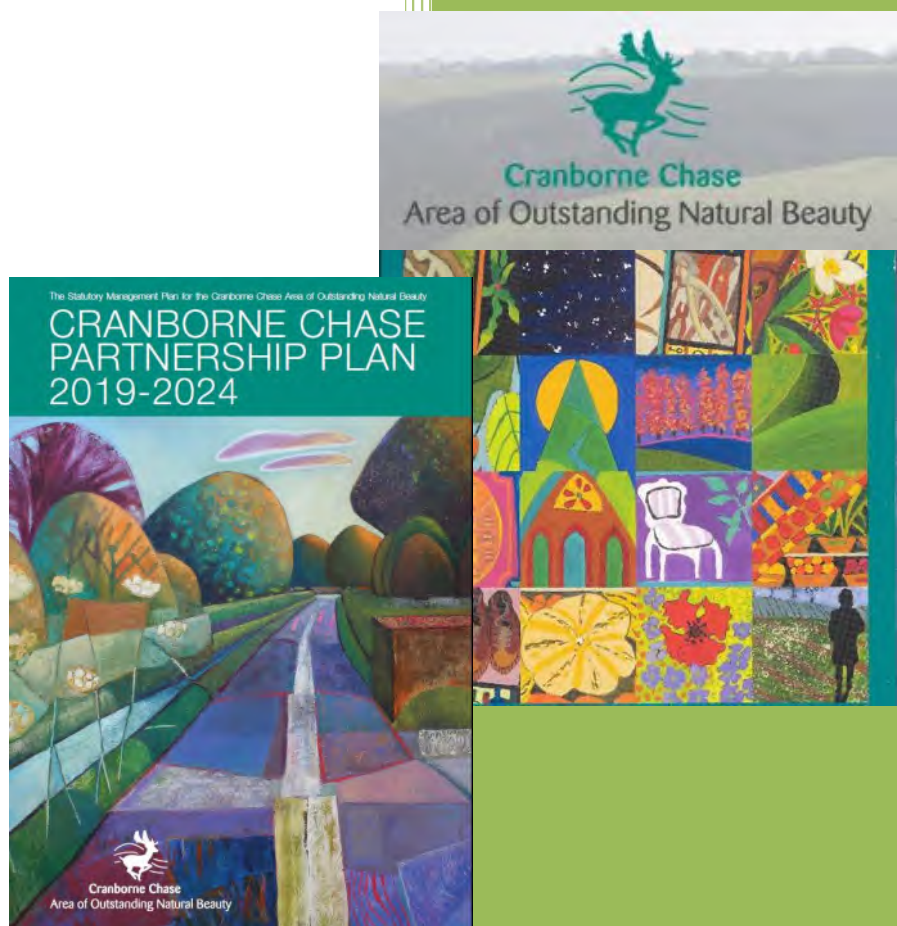
Policy 4b, Traffic Impacts, as currently worded seems too easy to dismiss! I recommend removing 'where feasible' [twice!] to ensure the various topics are addressed.

CCNL supports Policy 4d, Community Facilities, and Policy 4e, Energy, which echoes objectives of our Management Plan.

Although there may appear to be quite a lot of comments, CCNL does appreciate the consistent reference to conserving this National Landscape, and its characteristics, across the range of policies.

I hope those comments are helpful to you, and I would, of course, be happy to consider any proposed amendments.

Dark Night Skies & Cranborne Chase AONB Proposed Planning Policy for the Planning Authorities' Local Plan Reviews & Interim Policy for Development Management Purposes



**Cranborne Chase
Area of Outstanding Natural Beauty Partnership
June 2022 rev January 2023**

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Preface

*Cranborne Chase is the only AONB to have achieved the privilege of being designated as an **International Dark-Sky Reserve**, [IDSR]. This was achieved in 2019, after a rigorous assessment process, but it has to be remembered that the designation was 'provisional' only, pending improvement in meeting the high standards of being a Reserve, by reducing the amount of spilled light, which has such a detrimental impact on the darkness of the observed sky and the wellbeing of nocturnal fauna and human health.*

The international assessors of the IDSR require that 67% of all domestic and business outside lighting must meet Dark-Sky criteria. Sadly, the current level is estimated to be between 15-20%. Unless this can be addressed as a priority over the next 18 months, the area could well lose its Reserve status. The Cranborne Chase IDSR is therefore under real threat of losing this important status. The designation covers the whole of the AONB and the area's Management Plan makes reference to Dark-Sky with broad policies, together with information leaflets helping to convey the importance of limiting the brightness of outdoor lighting in particular. Actions needed involve; the screening of indoor lighting; low level outside lights, appropriate shielding, the use of Passive Infrared sensors [PIRs] and other measures, all aimed at minimising the impact of 'stray' or 'spilled' light.

It is important to emphasise that the benefit of the Dark-Sky is not just the ability to see the night sky and stars on clear nights. There is strong evidence to demonstrate that artificial light at night (ALAN) also has an adverse effect on human health, wildlife, and biodiversity. It is ironic that the introduction of LED lighting which is low energy and therefore beneficial in terms of energy usage, also results in these lights being generally installed with a far higher brightness than is actually necessary and much brighter than traditional incandescent bulb lighting.

Whilst the AONB team was instrumental in driving forward the bid for designation, it has to be remembered that all seven of the local authorities not only supported the bid, but gave a commitment to ensuring that its objectives were achieved. The only way that this can be progressed and delivered is through the controls that can be imposed by the constituent local planning authorities through the following measures:

- *The inclusion of appropriate a Dark-Sky policy within their Local Plan Reviews*
- *The inclusion of lighting as a subject to discussion and negotiations at 'pre-application' stage, and the need for a lighting strategy to be submitted, especially for larger scale developments within or close to the AONB and Dark-Sky Reserve boundary.*
- *During the consideration of planning applications, addressing lighting and Dark-Sky requirements, as a material consideration, in the same way that design, materials and landscaping are addressed.*
- *As part of the decision-making process, the need for imposing planning conditions to restrict the number of lighting units, set limits on light levels, time periods for lighting, and/or requiring applications to be submitted for new lighting schemes and other associated matters.*
- *The enforcement of any contraventions of lighting conditions.*

The commitment of the local authorities that was made in 2019 therefore now needs to be translated into coordinated and firm action if the IDSR assessors are to be satisfied that tangible progress is being made towards achieving the 67% target. Such action will also help meet the authorities' climate change, biodiversity, sustainability and tourism objectives.

In order to assist in achieving this objective the AONB Team has commissioned an independent planning consultant to prepare a report, setting out the issues associated with the dark-sky reserve and that proposes a Dark-Sky Reserve planning policy, for inclusion in all of the Local Plan Reviews, notably for Dorset and Wiltshire, within which the majority of the AONB is located.

It is considered essential that all Local Plans that administer the AONB have the same Dark-Sky policy so that there is clarity and certainty for planning applicants, Parish and Town Councils and the general public. Pending the progression and final adoption of the Local Plan reviews, it is proposed that the policy be approved by all seven authorities, as Interim Planning Policy for Development Management Purposes.

Dark Night Skies & Cranborne Chase AONB

Proposed Planning Policy for the Planning Authorities' Local Plan Reviews & 'Interim Policy for Development Management Purposes'

1 Introduction

1.1 Cranborne Chase AONB was designated the world's 14th International Dark-Sky Reserve in October 2019. All seven local authorities whose area falls partly within the Cranborne Chase AONB gave a firm commitment to reducing light pollution/having compliant lighting in the successful bid submitted to the International Dark-Sky Association (IDA) in 2019. There is, therefore, an obligation for all the authorities to continue to respect this *international* designation, and help control and reduce light pollution associated with new development as a primary means of conserving and enhancing the dark night skies.

1.2 The seven Local Planning Authorities that have an interest in the Cranborne Chase AONB are as follows:

- Wiltshire Council.
- Dorset Council.
- Hampshire County Council.
- Somerset County Council.
- New Forest District Council.
- Mendip District Council.
- South Somerset District Council.

In addition, Natural England is the key statutory consultee for AONB matters.

1.3 Cranborne Chase AONB has the darkest night skies in central southern England. The awe-inspiring Milky Way can be readily viewed here; something that over 90% of the UK population can rarely see due to light pollution. Unlike ancient historic settlements, rivers, soils, wildlife, and our outstanding landscapes, the night sky has no legal protection, which explains why in just six years light pollution has increased by 24% across the UK as a whole.

1.4 The characteristics and qualities that make this AONB special, as a whole, with regards to dark night skies are as follows:

- Cranborne Chase AONB is one of the darkest places in England.
- Dark night skies with a myriad of visible stars have always been an outstanding, memorable, and remarkable feature of this AONB.

- A topography that facilitates stargazing with open, elevated downland, wide panoramic, unobstructed views all with relatively easy public access.
- Lack of major towns and a low AONB population limits the incidence of light pollution and sky glow.

1.5 Further information about Dark-Sky in the AONB can be seen at this weblink, which is the relevant section from the AONB Management Plan:

<https://cranbornechase.org.uk/wp-content/uploads/2020/10/11.-Dark-Night-Skies.pdf>

The AONB 'Dark Night Sky Charter' is included as **Appendix 1**.

1.6 As a result of the Dark-Sky designation, residents and visitors to the AONB, together with the area's biodiversity, are able to experience benefits, which may include the following:

- An improvement in the overall quality of the area's environment and sense of night-time tranquillity; a key feature on the AONB.
- Less harmful impacts on the area's nocturnal wildlife arising from a reduction of stray artificial light.
- The potential for the local economy to be improved as Cranborne Chase has a natural 'attraction' for visitors to the area throughout the year, thereby supporting tourism-related businesses.

1.7 The local authorities have, of course, also all adopted the AONB Management Plan and its policies that refer to Dark-Sky issues and the control of light pollution. This current planning document now proposes to take matters a stage further, by promoting a specific **policy** that are recommended for inclusion within Local Plan Reviews, so that there is a more robust and statutory mechanism for controlling potentially light polluting developments. It is also clearly important that all seven authorities adopt a consistent approach to this issue and associated policies within their respective parts of the AONB, otherwise this will cause confusion for planning applicants, Parish Councils, and the general public.

1.8 This, of course, does not mean that there can be no new lighting, but it does mean that the aim should be to provide ***the right light in the right place at the right time***. In the simplest of terms this usually means downward facing lights of sufficient strength to provide the illumination required, but with the light only being on for the period of time when it is needed. Further technical details are included in **Appendix 2**.

1.9 The Cranborne Chase AONB is the only AONB in the UK which has been designated as an International Dark-Sky Reserve in its entirety, with the others being within National Parks, that include Brecon Beacons, Exmoor, and Snowdonia.

1.10 Concern about Dark-Sky has been a longstanding issue in Cranborne Chase and, indeed, the AONB Partnership set out its policy on Light Pollution as far back as 2008, and has provided a suite of Good Practice Guides to encourage and enable the installation of Dark-Sky compliant lighting. Highway lighting teams of the partner authorities have also provided examples of dark night sky compliant highway lighting, that is also energy efficient and economical, which has been most helpful.

1.11 Nevertheless, lighting associated with new domestic and business developments does not automatically comply with dark night sky criteria. A key aim of this policy document is to encourage and enable those proposing new developments to consider and plan for dark night sky compliant lighting from the outset.

1.12 It also sets out a policy for Local Planning Authorities to consider including with their Local Plan Review documents and, in the meantime, to approve the policies as an ***‘Interim Policy for Development Management Purposes’***, until such time as they are formally incorporated into and adopted in the Local Plan Reviews.

1.13 Whilst respective Local Plans may already make some reference to Dark-Sky as an issue, clearly if the subject is to be given the greater status that it deserves, it is important that a consistent approach is taken to applying policy in all areas of the AONB within each authority area. It is important to emphasise that this policy is only intended to apply for those parts of the AONB within each authority area, but clearly the authorities are free to apply them more widely if they consider it necessary and appropriate.

2 National Planning Policy Guidance (NPPF) 2023

2.1 The NPPF paragraph 191 clearly indicates that conserving dark night skies is a national priority. The Cranborne Chase AONB Management Plan, which constitutes the policies of the partner authorities for this AONB, also indicates that good, Dark-Sky compliant lighting, is an objective for this AONB.

2.2 It is important for all the partner authorities to recognise that there is an obligation to adhere to and help implement this national NPPF planning policy. It is therefore most

appropriate that respective Local Plan Reviews take forward this general national policy and apply it to their local situation. This document therefore provides the authorities with the policy basis and reasoned justification for undertaking this task.

2.3 NPPF Section 191 states as follows:

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate, and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life,*
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason, and*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

3 Lighting & Design

Avoiding Light Pollution

3.1 The **Institution of Lighting Professionals** has published an useful guide to this issue entitled '*The Reduction of Obtrusive Light*' [ILP GN 01/2021] see:

<https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>

3.2 Essentially there are two ways of avoiding light pollution in new developments. Firstly, at the design stage, features that have the capacity to contribute to light pollution are either not included or 'designed out' of the scheme at an early stage, or are effectively mitigated. Secondly, any required lighting follows the '*right light, right place, right time*' philosophy.

Avoiding Light Polluting Features at the Design Stage

3.3 Any elements of design that allow light to be emitted above or near the horizontal have the capacity to contribute to light pollution. That means that windows need effective curtains

or blinds, and internal light units that are lower than the top of windows need to be appropriately shaded. Those 'windows' that are angled upwards, such as roof lights and lantern lights, either need to be designed out of the structures or to have integral blinds or louvres that can be closed at night to prevent light pollution.

3.4 In some situations, extensive floor to ceiling or floor to gable glazing, which can be common in some modern dwelling designs, may be proposed. Whilst passive energy gain can be beneficial, extensive areas of floor to ceiling glazing also clearly have the capacity to emit a considerable amount of light at night above the horizontal, which is not acceptable in this International Dark-Sky Reserve. Therefore, for buildings on the edge of villages or in relatively isolated locations, large areas of extensive glazing can detract significantly, and arguably disproportionately, from the International Dark-Sky Reserve's objectives.

3.5 In addition, when lantern and roof lights are proposed in relatively inaccessible positions, this makes the manual operation of blinds or louvres impracticable. In these situations, the blinds or louvres should be automatically operated by light sensitive switches to close at dusk.

3.6 The key message therefore is that 'designing out' is avoiding the problem, which is the preferable solution, whilst the provision of blinds or louvres is 'mitigation'.

'Right Light, Right Place, Right Time'

3.7 As advised by the Institution of Lighting Professionals, good lighting practice is the provision of the right light, at the right time, in the right place, controlled by the right system. The application of artificial light in the external environment has done much to safeguard and enhance our night-time environment but, if not properly controlled, obtrusive light (sometimes referred to as light pollution) can present serious physiological and ecological problems.

3.8 **Obtrusive Light**, whether it keeps you awake through a bedroom window, impedes your view of the night sky, or adversely affects the performance of an adjacent lighting installation, is a form of pollution. It may also be a nuisance in law and can be substantially mitigated without detriment to the requirements of the task.

3.9 **Obtrusive light** can take several forms:

- **Sky Glow**: the brightening of the night sky.

- **Glare:** the uncomfortable brightness of a light source when viewed against a darker background.
- **Light Spill:** the spilling of light beyond the boundary of the area being lit.
- **Light Intrusion:** the presence of light from sources outside the affected person's property.
- **Light Presence:** sources of light in otherwise dark views.

These are all forms of obtrusive light, which may cause nuisance to others, or adversely affect fauna & flora as well as waste money and energy.

3.10 External lighting can therefore be polluting, waste energy, and provide dazzle and harsh shadows that in practice even counteract the security benefits of good lighting. This applies not only to business and public lighting, but also external domestic lighting which can, if not properly considered at the design stage, contribute significantly to light pollution. This is especially the case if the property is in a more remote, or countryside location, where the impact on 'Dark-Sky' and the associated tranquillity can be significant.

3.11 These effects are not only features of so called 'security lighting' but also the bulkhead and 'welcome' lights at front and back doors. If problems are to be avoided, only those that direct light downwards and with a limited light output should be provided and a low colour temperature, also known as "warm white", should be provided. See **Appendix 2** for explanation of technical terms.

3.12 In both the interests of ensuring compliance with dark night sky criteria and compliance with electrical regulations, it is better for developers to provide these lights rather than householders retrofitting them. It is important therefore that within the Cranborne Chase AONB, planning authorities raise these issues either at Pre-Application stage or include it as a requirement on the checklist that is used as part of the validation and registration of planning applications, so that the issue of lighting becomes a standard and integral part of the planning application process.

3.13 By raising this issue at the outset, it will save both time and money by ensuring that light pollution is planned out of development schemes, rather than trying to impose requirements and changes after the application has been approved or worse still, trying to secure changes after development has been completed. There is no reason why the provision of dark night sky sensitive units should be more costly than others. It is simply a case of selecting the most appropriate units for the particular situation and environment.

3.14 For larger scale developments, it will be necessary for planning authorities to require that a lighting strategy and a specification is included within applications, to demonstrate that schemes would be Dark-Sky compliant, once implemented. The design and lighting criteria should also apply to smaller and householder planning applications, including self-build constructions as well as extensions and additions, although a lighting unit specification would be sufficient in such cases.

3.15 Internally and externally illuminated signs also need to ensure light is not emitted above the horizontal, either directly or by reflection, and that light outputs are within limits. Externally, use should be made of passive infrared [PIR] motion sensitive light switches, unless particular safety or other circumstances dictate otherwise, and any signs should not be illuminated unnecessarily, such as outside opening hours.

3.16 Furthermore, for all applications within the AONB where lighting may potentially be required in future, there is potential to impose a planning condition requiring applications to be submitted for new lighting schemes, so that the Local Planning Authority has the opportunity to evaluate any proposals for additional lighting and to ensure that they are Dark-Sky compliant.

4 Current International Dark-Sky Lighting Criteria & AONB Policies

4.1 The current International Dark-Sky Association criteria consist of Five Principles for Responsible Outdoor Lighting (this implicitly includes indoor lighting that illuminates the outside).

1. All light should have a clear purpose. This purpose should be identified before a light is installed or replaced. Consider the impact of the light on wildlife and the environment, and consider the use of reflective or luminous markers for signs, curbs and steps.
2. All light should be targeted. Use shielding and careful orientation so that light does not spill beyond where it is needed.
3. Light should be no brighter than necessary. Use the lowest light level required and consider whether the lit surfaces will reflect light into the sky. Use dimmers if different light levels are needed.
4. Light should be used only when it is useful. Use timers and motion detectors (e.g. PIRs) to ensure that light is available when it is needed and is turned off at other times. Lights should turn off a maximum of 5 minutes after motion ceases.
5. Use the warmest colour with the lowest *Correlated Colour Temperature* [CCT] possible. In practice, this means having a maximum of 2700K (2200K preferred).

See **Appendix 2** for further explanation of technical terms.

The Cranborne Chase AONB Management Plan Policies

4.2 The Cranborne Chase Management Plan has been approved, not only by the AONB Board but also has been formally adopted by all the seven Local Planning Authorities. The AONB Management Plan therefore constitutes the Local Planning Authorities' Planning Policy for the Area. It is therefore an important Material Planning Consideration when determining all planning applications within the respective parts of the AONB.

Management Plan Dark Night Skies Policies

4.3 These are general statements rather than planning policies that can be readily used by local planning authorities to help in the assessment of planning applications. None the less they explain the objective for the AONB. The Management Plan's Dark-Sky policies are to:

DNS1 Actively promote the benefits of IDSR status to all partners and communities to elicit appropriate action and support for the application to IDA.

DNS2 Work with all LPA partners to:

- Retain IDSR status through continuous improvements to lighting/retrofitting schemes.
- Embed good practice lighting guidance within their Local/Development Plans.
- Ensure substantial lighting schemes, such as those for schools, businesses and sports areas, are competently designed and meet DNS and other environmental criteria.
- Submit an annual report of activities to maintain the IDSR status.

DNS3 Support parish councils in promoting good practice lighting to their residents and businesses, offering Dark-Sky Friendly Parish Award.

DNS4 Investigate the potential for sponsorship/provision of low-cost good practice outside light fittings within the AONB.

DNS5 Work with other UK 'Dark-Sky Places' and related organisations to improve awareness and understanding across the country of the need to reduce light pollution.

DNS6 Develop a Dark-Sky Friendly Accreditation Scheme for local tourism and allied businesses.

DNS7 Determine a potential location, design criteria and funding requirements necessary to establish an AONB Observatory within the timeframe of this Plan.

4.4 Whilst these Management Plan policies set out broad objectives and guidance, they do not provide the precise level of detail required for a Local Plan Policy, against which planning applications can be assessed for decision making. The following section and policies therefore address this issue.

5 Proposed Reasoned Justification and Dark-Sky Policy for inclusion in Local Plan Reviews

Reasoned Justification

5.1 The reasoned justification for a Local Plan Review Policy is included within, and can be drawn from, the accompanying text above. This explains the background, purpose, and basis for the policies and together with the proposed policy below, provides the necessary information for including appropriate text and policy statement within the Planning Authorities' Local Plan Reviews.

5.2 As noted above the NPPF (2023) 191c states:

“(c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

This, together with the policies in the Cranborne Chase Management Plan, therefore, provides the statutory framework for Local Plan Review Dark-Sky Policies.

5.3 The principles in this Policy Statement therefore include the following:

- In the Cranborne Chase AONB, development should be designed to conserve and enhance the intrinsic quality of dark night skies. Lighting which is proposed to be installed should meet or exceed the level of protection appropriate to the Environmental Zone (as defined by the Institution of Lighting Professionals in its Guidance Note 01/2021) in which it is installed.
- In the International Dark-Sky Reserve, that is 'Zone E0'. That means external lighting should be fully shielded and not exceed a 'Correlated Colour Temperature (CCT)' of 2700K, with 3000K reserved for purposes for which 2700K or lower lights are not available.

5.4 In practice, all outdoor lighting, or indoor lighting that shines outside, in the AONB must meet the requirements of ILP GN 01/2021 (or its current updates) Environmental Zone E0 (Core) or E1 (Buffer), and the current requirements for an International Dark-Sky Reserve as specified by the International Dark-Sky Association. The difference between E0 and E1 is primarily in the permitted effects of spill light, glare, illuminated signage, and reflected light from surfaces. Tables 3, 4, 7 & 8 in ILP GN 01/2021 provide further guidance. The map in **Appendix 3** shows the core and peripheral/buffer areas within the Cranborne Chase AONB.

5.5 As stated in the Preface, all seven of the local authorities not only supported the bid, but also gave a commitment to ensuring that its objectives were achieved and a summary of the commitments made at that time by each authority, is included in **Appendix 4**. In order for a meaningful and consistent approach to be taken by all seven Local Planning Authorities, the following actions are proposed:

- The inclusion of appropriate Dark-Sky policies within their Local Plan Reviews
- The inclusion of lighting as a subject for discussion and negotiations at ‘pre-application’ stage, and the need for a lighting strategy to be submitted, especially for larger scale developments within or close to the AONB and Dark-Sky Reserve boundary.
- During the consideration of planning applications, addressing lighting and Dark-Sky requirements, as a material consideration, in the same way that design, materials and landscaping are addressed.
- As part of the decision-making process, the need for imposing planning conditions to restrict the number of lighting units, set limits on light levels and *and/or requiring applications to be submitted for new lighting schemes and other associated matters.*
- The enforcement of any contraventions of lighting conditions.

5.6 The commitment of the local authorities that was made in 2019 therefore now needs to be translated into coordinated and firm action if the IDSR assessors are to be satisfied that tangible progress is being made towards achieving the 67% target, which will also help meet the authorities’ climate change, biodiversity, sustainability, and tourism objectives.

Proposed Local Plan Review Policy

Policy IDSR 1

Within those parts of the Local Authority Area that fall within the Cranborne Chase Area of Outstanding Natural Beauty:

- a) To prevent light pollution and ensure compliance with IDSR criteria, all planning applications for development over 2 dwellings or for other developments over 100 square metres that involve the provision of external lighting, shall be accompanied by a lighting strategy, with detailed specification of any proposed lighting units and demonstrating how consideration has been given to maintaining and enhancing the Dark-Sky within the AONB.***
- b) All lighting units provided must be: downward facing and shielded to prevent upward emission of light; be no brighter than the minimum required for the lighting task; and be fitted with PIR sensors.***
- c) All ground-based lighting units to mark pedestrian paths and similar areas shall be located no higher than 1 metre above ground level and all wall mounted lighting units shall be located as low as practicable and shielded to prevent upward emission of light.***
- d) Any proposals and designs that include roof lights, lantern lights, and/or floor to eaves and floor to gable glazing, will not be supported in new build, refurbishment, and extension projects, unless integral blinds or louvres or external 'brise soleil' fixed louvres, are provided as mitigation.***
- e) All such blinds and/or louvered units that are not easily accessible, must be provided with automatically operated, light sensor systems, to ensure closure at dusk.***

Policy IDSR 2

In order to control the installation of lighting after new development has been implemented, all planning consents within the AONB will include a condition that requires applications to be submitted for any future installation of external lighting, within the IDSR and its setting.

5.7 The reason for this policy is to protect the International Dark-Sky designation within the Cranborne Chase AONB and prevent light pollution adversely affecting the Dark-Sky and their appreciation and for the benefit of human health, wildlife, and biodiversity.

6 Recommendation to the Local Planning Authorities

6.1 In the light of the above considerations, it is recommended that:

1 A section, with associated planning policy and reasoned justification, relating to the International Dark-Sky Reserve within the Cranborne Chase Area of Outstanding Natural Beauty, be included within all the current and emerging Local Plan Reviews, providing the background and justification for the Dark-Sky policies.

2 The proposed Local Plan Policy be approved for inclusion in all Local Plan Reviews, as an integral part of the Plans.

3 Pending the adoption of the Local Plan Reviews, this document and this Dark-Sky Policy be approved by each Local Planning Authority as ***‘Interim Policy for Development Management Purposes’*** to be applied to planning applications within the Cranborne Chase AONB.

Cranborne Chase AONB Partnership
June 2022, updated January 2023.

A CHARTER FOR PRESERVING AND ENHANCING THE DARK NIGHT SKY OF
THE CRANBORNE CHASE
AONB INTERNATIONAL DARK-SKY RESERVE

This Charter sets out the principles to be followed by any organisation or individual who signs up for the Dark-Sky Friendly Scheme. It will be a fundamental document for initiating and coordinating action related to our status as an International Dark-Sky Reserve.

DARK NIGHT SKY CHARTER

In 2019, the International Dark-Sky Association granted us the prestigious designation of International Dark-Sky Reserve (IDSR). As part of the conditions of this designation, we must reduce light pollution in the night sky above the IDSR. Those who sign up to this Charter value the quality of the Dark-Sky that already exists and undertake to act to preserve and enhance this quality. Signatories will implement and/or promote the following:

- Shielding lights, so that they do not emit any light above the horizontal, to reduce *skyglow* and the *adverse effects of light on flying fauna*.
- Shielding lights, so that they do not shine off the property, to reduce *light intrusion* and *glare*.
- Using light of a correlated colour temperature of 2700K or lower (“warm white” light) to reduce *glare*, *skyglow from light scatter*, and the *adverse effects of light on nocturnal fauna*.
- Have exterior lights on motion sensors (PIRs) with a maximum “on” time of 5 minutes to reduce their effect on all aspects of the night-time environment, especially *skyglow from light scatter and reflection* and the *adverse effects on flora and nocturnal fauna*.
- Using lights with the minimum brightness necessary for their intended task, to reduce their effect on all aspects of the night-time environment, especially *skyglow from light scatter and reflection* and the *adverse effects on flora and nocturnal fauna*.
- In the case of tourist accommodation providers, promote the Dark-Sky environment by providing binoculars or telescopes, star charts, red-light torches, etc, for loan to guests, and making provision for late breakfasts and late returns in the night after astronomy activities.
- Respect and raise awareness the IDSR generally by promoting, in person, on social media, or on own websites, Dark-Sky events such as stargazing evenings, and talks on light pollution and its consequences and remedies.

Appendix 2 - Technical Lighting Information - Correlated Colour Temperature

Modern LED lighting now comes with an indication of its “**Correlated Colour Temperature**” (CCT), which is an indication of the temperature to which a glowing filament would need to be raised in order to produce a similar quality of white light. It is measured in Kelvin (K) which is the international standard unit for temperature.

Paradoxically, the cooler the colour temperature, the warmer the light appears. Light with a CCT of 5000K or more appears harsh, bright, and cold; light with a CCT of 3000K or less appears soft and warm. (The glowing filament analogy is that red hot is cooler than white hot.)

The higher the CCT, the more blue light will be in the spectrum. This is important for several reasons:

- Blue light is scattered more by the atmosphere. This not only means that it contributes more to skyglow, but it also exacerbates the other harmful effects.
- Insects are more attracted to blue-rich light than to “cooler” colours. When this happens, they are not foraging, reproducing, or pollinating, and are more likely to be predated upon. Fruit flies (*drosophila*) left exposed to blue light for 24 hours will simply die.
- The effect on insects has a knock-on effect on insectivores; it modifies their behaviour.
- The presence of blue-rich light causes levels melatonin (the “sleep hormone”) to plummet, disturbing sleep and causing a variety of health problems in many vertebrates, including humans.

There are misconceptions that a low CCT means poor colour rendition. This was once true, but is no longer the case: colour rendition is related to a property called the Colour Rendering Index (CRI). LEDs with a CCT as low as 2200K can have a CRI in excess of 80, which is considered to be “very good”.

For these reasons, in the International Dark-Sky Reserve the CCT of external lighting should be limited to 2700K, with 2200K preferred. 3000K should be reserved for purposes for which 2700K or lower lights are not available. Anything in excess of 3000K should be used only in exceptional, very limited, circumstances with full mitigation (shielding, duration-control) being implemented.

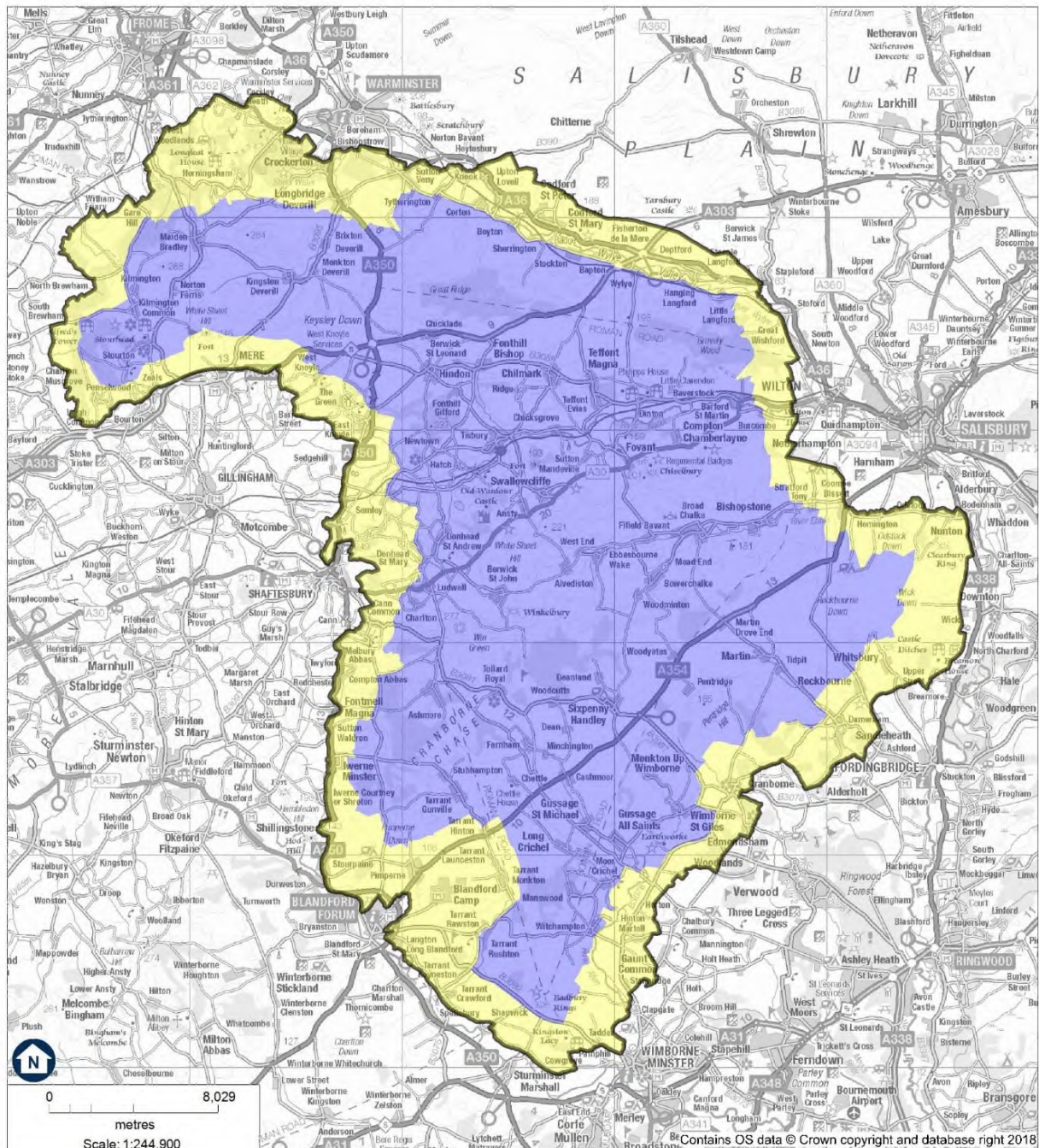
Appendix 3 – Map of Core and Peripheral International Dark-Sky

Reserve Areas and Boundaries within the AONB

Purple - Core Area

Yellow - Buffer or Peripheral Area

Cranborne Chase Area of Outstanding Natural Beauty International Dark Sky Reserve – Core and Periphery Boundaries



Appendix 4 – Summary & Extracts of Local Authority Commitments - 2019

Wiltshire Council

I am pleased to confirm Wiltshire Council's strong support for Cranborne Chase AONB Partnership's application to become an International Dark Sky Reserve. As the host authority for the AONB Partnership and geographically the largest local authority by area (approximately 60%) within the AONB, Wiltshire Council supports this objective within the AONB Management Plans for 2014 – 2019 and the draft for 2019-2024 as a partner and signatory to the plans.

We also hope that our own actions will help to influence and enable us to work alongside the other local authorities within the AONB and its settings to achieve dark skies.

Corporate Director – Growth, Investment and Place

Dorset Council

I am writing to confirm our support for Cranborne Chase AONB's application to be an International Dark Sky Reserve. We recognise the many benefits of encouraging better lighting and reducing light pollution, both for people and wildlife. It will also create opportunities for enhancing the local economy through promoting the AONB and Dorset as a destination for visitors keen to see dark night skies.

Chief Executive

Hampshire County Council

I am writing to confirm Hampshire County Council's support for Cranborne Chase AONB's application to be an International Dark Sky Reserve. The Council values its protected landscapes, the benefits these bring to Hampshire communities and environment, and the importance of dark night skies to the natural beauty of these outstanding areas.

This authority is keen to support the creation of best practice lighting policies and practice where astronomers, local planning authorities and local residents work together to preserve existing dark night skies. Designation of the AONB as a Dark Sky Reserve will create opportunities for enhancing the local rural economy through the promotion of the AONB and Hampshire as a destination for visitors keen to see amazing dark night skies.

Director – Economy, Transport and Environment

Somerset County Council

Somerset County Council is pleased to support the AONB's application to be granted International Dark Sky Reserve (IDSR) status, to become one of only a handful of destinations that can prove they have an outstanding quality of night sky.

This objective was included in the AONB's Management Plan 2014 to 2019, which has been adopted by Somerset County Council. We note that the objective is also included in the 2019 to 2024 Management Plan, which is currently in the closing stages of consultation.

Chief Executive

South Somerset District Council

South Somerset District Council recognises the importance of the Cranborne Chase AONB in providing residents and visitors with a green and diverse landscape in which to work, live and spend recreational time in. AONBs are important for the health and well-being of residents as accessible green landscapes are proven to aid physical and mental health.

South Somerset District Council supports Cranborne Chase AONB's application to become an International Dark Sky Reserve. The issues that street lighting cause are documented globally and SSDC welcomes the application from the AONB.

Chief Executive

Mendip District Council

This is an exciting opportunity and we are happy to support the approach being championed by the Partnership to secure IDSR status. We are keen to encourage the better use of lighting through the planning process and understanding its impact on the night sky and local wildlife, particularly in our rural areas.

It is hoped that should the application be successful, this will also help increase visitors to the area, especially in the winter months when the night sky is at its best for astronomers.

Chief Executive

Cranborne Chase AONB Partnership

June 2022

Representation number: 8

From: Brian Hughes

Submitted: 16 May 2025

Method of submission: Online portal

Comments:-

Having looked through the plan and followed the process throughout I am aware of the very considerable amount of time taken to include all aspects of the conditions. The team producing the plan together with support received from all the agencies involved including Dorset Council have worked hard to make this Neighbourhood Plan fit for the future. I fully SUPPORT the plan and look forward to its acceptance. My family home is in the Parish of Melbury and Cann although presently living at the address above [UK address outside Dorset].

Representation number: 9

From: Diccon Carpendale, Planning Partner

Organisation: Brimble Lea

Submitted: 21 May 2025

Method of submission: Email

Comments:-

This response to the Regulation 16 Consultation is made on behalf of the owners of 'Land South of Melbury Motors' subject to Policy 1f – as referenced in figure 15 and paragraphs 81- 88 (inclusive) - and the proposed allocation subject to Policy 1f as set out on pages 23 and 24 of the Regulation 16 version of the Neighbourhood Plan.

I would be grateful if the following comments could be considered by the Plan Examiner:

We support the allocation of the site in accordance with Policy 1f but subject to minor modification to some of the conditions/criteria of the Policy:

Modify requirement (ii) to read '*50% of the properties should be discount market sales housing (see also 13.4. Policy 1d. Affordable Housing on page 17).*'

This is to bring the policy into line with the definitions within the NPPF.

Remove Requirement (vi) '*Consideration of mitigating road safety measures on adjacent highway must be taken and addressed*' is unnecessary.

Prior to putting forward the site for inclusion within the Neighbourhood Plan, it was subject to an application for planning permission (which was subsequently withdrawn). At this stage the competent Highway Authority (Dorset County Council) confirmed there were no plans for any physical improvements to be made to the road junction.

Please find attached as **Appendix A** email correspondence relating to the matter. This confirms 'Subject to satisfactory visibility splays being provided, along with the necessary on-site turning and parking facility I can't see any obvious problems with your scheme. The only comment that I will make is that pedestrian accesses directly onto the public highway could encourage parking close to the junction and I wonder if they could be accessed from the rear instead.'

The Indicative Site Plan for the site has been amended and removes any proposed access to the properties from the highways bounding the site.

With requirement (vi) being unnecessary, it is requested it is omitted from the policy.

Amend requirement (vii) *'Existing established trees on the site should be retained' (see Policy 2b. 'The contribution of woodland and trees to local character').*

An arboricultural survey has been undertaken, and this is attached as **Appendix B**. This indicates the tree close to the southwest corner of the site (which may be that requested for retention within the policy) is category C quality and should not be considered a constraint to development. As such it is requested the wording of requirement (vii) is amended to read *'The development should seek to retain any trees worthy of retention. Any trees that need to be removed should be replaced with suitably located replacements'.*

Taken overall, this site contributes significantly to the provision of affordable housing within the Neighbourhood Plan by delivering 50% of the 4 proposed dwellings as discount market sales housing. This contributes positively to the overall mix of affordable housing being proposed within the Neighbourhood Plan.

I would be grateful if the above comments were considered by the examiner and I trust that the site will be confirmed as an allocation within the Plan the subject to the proposed amendments to the Policy wording.

Appendix A

From: Steve K Savage, Transport Development Manager, Dorset County Council
Sent: 01 November 2018 08:56
To: Diccon Carpendale
Subject: RE: Land at Cann Common - IN CONFIDENCE

Dear Diccon

My colleagues in highway improvements have confirmed that there are no plans for any physical improvements to be made to this road junction.

So, no need for any land dedication on your client's part and your proposal can be considered on its own merits.

Subject to satisfactory visibility splays being provided, along with the necessary on-site turning and parking facilities, I can't see any obvious problems with your scheme. The only comment that I will make is that pedestrian accesses directly onto the public highway could encourage parking close to the junction and wonder if they could be accessed from the rear instead?

All the best

Steve



Arboricultural Statement

The following statement relates to the quality and value (in a non-fiscal sense) of the existing tree stock within the context of proposed development on land at Cann Common, Shaftesbury SP7 0DQ.

Preamble

The following is based on British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations (BS:5837).

BS:5837 provides 'recommendations and guidance for arboriculturists, architects, builders, engineers, landscape architects and all others interested in harmony between trees and development in its broadest sense.'

BS:5837 gives 'recommendations and guidance on the relationship between trees and design, demolition and construction processes', and it 'it sets out the principles and procedures to be applied to achieve a harmonious and sustainable relationship between trees and structures'.

The Tree Survey

The purpose of the tree survey is to identify the quality and value (in a non-fiscal sense) of the existing tree stock within the context of proposed development, allowing informed decisions to be made concerning which trees should be removed or retained in the event of development occurring on land at Cann Common, Shaftesbury SP7 0DQ.

The quality and value of existing trees is allocated to one of four categories, namely A, B, C or U for Unsuitable for retention. The category allocated to each tree depends in part upon the information gathered in the tree survey, it depends in part upon the 'cascade chart for tree quality assessment' contained within BS:5837 and it is in part, subjective.

A proposed design *must* make every effort to retain all category A trees and where possible *ought* to retain category B trees. Category C trees *should* be retained if there is scope to do so but they should not be considered a constraint to any proposed design or subsequent development.



Photo 1 (above): Sycamore T1 viewed from south of the site



Photo 2 : Sycamore T1 viewed for the east

The Development

The proposed development is to construct four new dwellings.

Protected and Heritage Trees

The site does not lie within a designated Conservation Area: there are no Tree Preservation Orders in effect either on, or immediately adjacent to the site.

Reference: treeteameast@dorsetcouncil.gov.uk

There are no ancient or veteran trees on, or immediately adjacent to the site.

Reference: <https://ati.woodlandtrust.org.uk/>

The site is not an ancient woodland or a wood pasture and there are no ancient woodlands or wood pastures immediately adjacent to the site.

Reference: <https://magic.defra.gov.uk/>

The site is not a priority habitat and there are no priority habitats immediately adjacent to the site.

Reference: <https://magic.defra.gov.uk/>

The site is not included on the National Heritage List for England (NHLE) for registered parks and gardens, and battlefields

Reference: <https://historicengland.org.uk/>

The above websites were referenced on Wednesday 25th October 2023.

Statement

The sycamore (please see photos 1 and 2 on page 2), T1, is unremarkable and of limited merit and hence allocated to category C. The loss of this tree would have a minimal impact on the visual amenity of the local area or the wider landscape and as such it should not be considered a constraint to any proposed design or subsequent development. Notably, there is ample scope for new planting to mitigate the loss of T1 and to ensure the habitat for wildlife is in a better state than it was before the proposed development.

Signed: *Nicholas Hellis*

Dated: *25th October 2023*

Nicholas Hellis MArborA

Representation number: 10

From: Philip Reese, Senior Planning Policy Officer

Organisation: Dorset Council

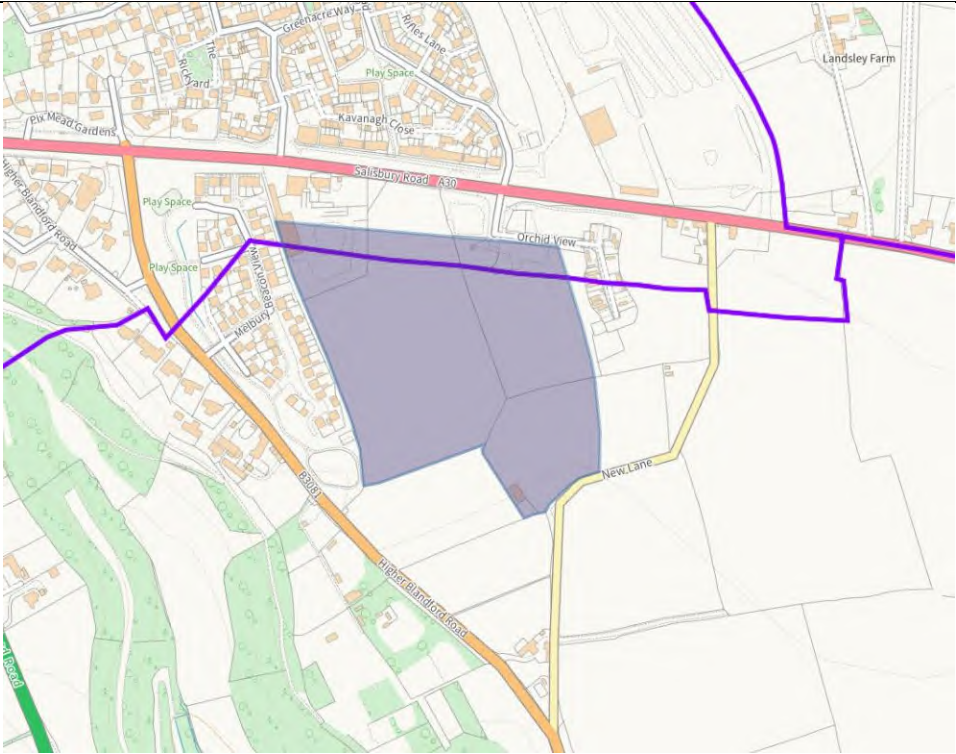
Submitted: 30 May 2025

Comments:-

Dorset Council welcomes progress of the Melbury Abbas and Cann neighbourhood plan, and supports its vision and objectives. We have commented on earlier versions, including the Regulation 14 version (as evidenced by the submitted Consultation Report). While Dorset Council represents various interests and objectives, one of our main roles in this situation is as Local Planning Authority which has a duty to determining planning applications in the area. While we recognise that the submitted plan has been written by members of the community, we have to consider the implementation of the policies. A lot of our comments therefore focus on ensuring that the policies are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (NPPF para 16d). We hope that these comments are seen as constructive and help to finalise the plan ready for referendum.

Section	Our comments
Table of contents	We note there is an unexplained jump in section numbering between Section 10 (Achieving sustainable development) and Section 13 (Housing). If possible, it might be sensible if this issue could be resolved before the plan proceeds to referendum.
Para 4	<p>“The Melbury Abbas and Cann Neighbourhood Plan 2024-2038”</p> <p>We consider the plan period to be a fundamental part of the plan proposal and should be kept the same from Regulation 14 onwards. The plan period at Regulation 14 was 2022 to 2038 and we advised the group to keep this rather than updating it to 2024 to 2038. The cover page has been corrected, but there are one or two places where it still says 2024, such as here.</p>

Section	Our comments
Para 6	As the examiner will be aware, a neighbourhood plan does not have to be found 'sound' in the same sense as a local plan. It has a lower bar and instead has to meet the basic conditions plus other statutory obligations.
Para 23	Table 2 on page 14 shows average number of bedrooms and rooms and not whether properties are detached or semi-detached. I can't find a table that provides this information – perhaps it was deleted from an earlier version of the plan.
Para 24	<p>“According to 2021 census statistics, the Neighbourhood Area had a population of 1,1350 residents occupying 370 households.”</p> <p>Presumably this should read “1,350 residents”.</p>
Para 27	<p>“There are currently no strategic allocations for development in the Neighbourhood Area...”</p> <p>This is not entirely true as the 2003 Local Plan defined an area reserved for employment development on the southern edge of Shaftesbury, which crosses over into the Melbury Abbas and Cann neighbourhood area – see map below. The area now has planning consent for a residential led scheme.</p>

Section	Our comments
	 <p>Note that in the map above the thick purple/blue line is the parish boundary, with Shaftesbury to the north and the parish of Cann to the south. The shaded area is land allocated for employment uses in the 2003 North Dorset Local Plan and is just over 6 ha.</p>
Para 28	<p>“with a 1,793 net additional dwellings across Dorset per annum to 2038”</p> <p>Note that these figures were based on the old standard method. The new standard method, published in December 2024, produces a housing need figure for Dorset of c. 3,219 dwellings a year (an 80% uplift). The latest Local Development Scheme, as described in para 29, sets out that Dorset Council intends to consult on new site options in response to this higher figure in August 2025. Note also that the local plan period is likely to be extended to at least 2042 to allow for 15 years from the date of adoption.</p>
Para 30	<p>Our current thinking is that Melbury Abbas and Cann should remain a Tier 4 (smaller villages) settlement. These typically have no settlement boundary and no proposals for growth in the emerging local plan.</p>

Section	Our comments
Para 31	<p>“...as per the December 2023 National Planning Policy Framework (NPPF) paragraphs 10-14.”</p> <p>The most recent NPPF was published in December 2024. However, under the transitional arrangements set out in paragraph 239, the policies of the previous NPPF apply to this neighbourhood plan because it was submitted on 12 March 2025. In any case, paragraphs 10 to 14 are largely unchanged although some small changes were made to paragraph 11(d).</p>
Section 9.1 'Vision'	<p><i>“By 2038, the Melbury Abbas and Cann Neighbourhood Plan 2024-2038...”</i></p> <p>As noted above, the NP period should be 2022 to 2038.</p>
Table 1, general	<p>This table appears to summarise the tables on pages 66-70 of the Basic Conditions Statement and is effectively a sustainability assessment. The scoring system appears to use either ** or *** and in some cases nothing. It's not explained what these symbols mean. Sustainability appraisal matrices typically use a scoring system along the lines of:</p> <p>+ / ++ = positive / very positive</p> <p>0 / ? = neutral / unknown</p> <p>- / -- = negative / very negative</p>
Table 1, Policy 1a	<p>In terms of Policy 1a, which promotes development on brownfield and infill sites, I would have thought it would provide an economic benefit, however, the score for this has been left blank. It's unclear whether this is because the assessor has considered it neutral, unknown, or not scored it. By contrast, Policy 1b (promote sustainable population through modest development) has ** against its economic score.</p>
Table 1, Policy 3b	<p>The objective here refers to “development gain” and this term is used in various places throughout the document. North Dorset, which the neighbourhood area sits within, does not have an adopted CIL charging schedule. Therefore, any money collected as part of the planning process is done through Section 106. The group have previously been advised that</p>

Section	Our comments
	<p>'gain' in this context is not an accurate term as infrastructure provision will only accrue in order to mitigate harm that would otherwise arise from new development (in accordance with NPPF para 58 and Regulation 122 of the Community Infrastructure Levy Regulations 2010). It was therefore suggested that this objective might be reworded along the lines of: "To ensure that development affecting the parish alongside the A30 mitigates its impacts fully and equitably."</p>
Table 1, Policy 4c	<p>This appears to have the wrong objective against it. The objective on page 69 is: "To future-proof and modernise local infrastructure"</p>
Table 1, Policy 4f	<p>Policy name is incomplete. Should be "Sustainable ground-mounted PV"</p>
Figure 9	<p>The representation made by Cranborne Chase NL remarks that this map contains two isolated areas of green, which are not part of the National Landscape. It appears from the key to the map that the same shade of green has been used for National Landscape and Local Green Space, hence the confusion. There are other colours repeated in the key (red, purple and orange) and these will all have the potential to confuse. We suggest that this map is re-done with a less ambiguous set of colours and symbols.</p>
Para 55	<p>"Development of these two [?] on B3081 or the adjacent Persimmon site on the A30"</p> <p>I assume this is referring to two <u>sites</u> on the B3081 (Higher Blandford Road), but from the context it's not clear which ones. Para 74 on page 20 appears to provide a likely explanation.</p>
Table 2	<p>The label for this table says "Tenure", however, the table presents the number of bedrooms and number of rooms per household. I would also query whether it means "household" or "house" as the latter seems more likely.</p>

Section	Our comments
Figure 10	As this section (and Policy 1a) discusses the need to protect the National Landscape, it might be useful if the boundary for this designation could be shown on this map.
Policy 1a(ii)	<p><i>“...with the exception of sensitive brownfield development, new dwellings on greenfield sites should not be built within the rural-urban buffer zone...”</i></p> <p>It’s not clear what would happen with brownfield development which wasn’t considered sensitive. For clarity, I suggest either deleting the word “sensitive” or deleting the phrase “on greenfield sites”.</p> <p><i>“...so as to protect from urban encroachment from the neighbouring town of Shaftesbury;”</i></p> <p>This isn’t particularly clear and suggests that the urban encroachment is coming from Shaftesbury, which wouldn’t be accurate if the proposed development site is not contiguous with the urban area of Shaftesbury. It might be more accurate to say something along the lines of:</p> <p><i>“...so as to maintain an open / undeveloped gap between Shaftesbury and the villages of...”</i></p>
Policy 1a(v)	<p><i>“Sites do not lead to the destruction of existing trees and hedges...”</i></p> <p>It might be more accurate to say “Development of the site does not lead to...”</p>
Policy 1b	<p>It should be noted that the target of 45 dwellings is a figure published in Appendix 2 of the 2021 Dorset Council Local Plan options consultation. This appendix provided housing requirement figures for each of the neighbourhood areas (a requirement of NPPF para 69). The published requirement figures consisted of a sum of: completions since the beginning of the plan period (2021); extant planning permissions; adopted housing allocations; capacity of major windfall SHLAA sites within settlement boundaries; and a windfall allowance for minor sites based on recent completion rates. In Melbury Abbas and Cann there was extant</p>

Section	Our comments
	<p>consent for 3 x 1 dwelling sites, plus a further 35 on the Persimmon site on Higher Blandford Road, Shaftesbury (35 out of the total 55 dwellings were deemed to be within Cann parish). A windfall allowance of 7 was added, which gave a total of 45 dwellings. This can be considered a high figure for a Tier 4 settlement, however it can be seen that the vast majority of the figure was derived from the Persimmon development, which is now complete. Since then, Persimmon has gained permission on an adjacent site for a further 107 dwellings. There is clearly uncertainty as to whether either of the Persimmon developments meet the needs of Melbury Abbas and Cann. However, if the Persimmon development was taken out of the calculations for the housing requirement figure published in the 2021 DCLP consultation, the resulting figure would be 10 dwellings rather than 45, which would be equivalent to less than 1 per year based on a plan period of 2021 to 2038. This figure is in line with the figures for other Tier 4 settlements which tend to be between 0 and 12.</p>
Policy 1c	<p><i>"All proposals for new housing development should demonstrate how they contribute to maintaining an appropriate mix of tenures, types and size of dwellings which address current housing need..."</i></p> <p>I'm unsure this is a reasonable or proportionate requirement, particularly for schemes of individual dwellings which are likely to come forward in infill sites under Policy 1a. Such housing is likely to favour self-build development, and therefore will be designed to meet the needs to the developer rather than for open market sale.</p>
Para 65	<p>Since this was written, a new government has come into power, and they have placed much less emphasis on affordable home ownership and more emphasis on providing more social rented properties. For example, in the previous version of the NPPF, para 66 requires 10% of the total number of homes to be available for affordable home ownership. In the new NPPF, the paragraph says that the mix of affordable housing should meet identified local needs across social rent, other affordable housing for rent and affordable home ownership tenures. Footnote 31 to revised paragraph 66 states: "The requirement to deliver a minimum of 25% of</p>

Section	Our comments
	<p>affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, no longer applies. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need.” However, as mentioned above, policies of the previous (Dec 2023) version of the NPPF apply to the examination of this neighbourhood plan.</p>
Para 69	<p>“The December 2023 NPPF states that affordable housing is required for major (10+) sites, with exceptions for community-led or <u>100% affordable housing sites</u>.”</p> <p>As mentioned above, policies of the previous (Dec 2023) version of the NPPF apply to this neighbourhood plan. In any case, the paragraphs quoted below are largely the same between the 2023 and 2024 versions of the NPPF.</p> <p>NPPF para 64 says that where there is a need for affordable housing then it should be required and expect it to be met on-site. Para 65 says that affordable housing should not be sought for schemes that are not major developments (which is defined as 10 or more dwellings), other than in designated rural areas.</p> <p>Exception sites for community-led housing is covered by NPPF para 76. It explains that such sites should be on land which is not already allocated for housing. This would suggest that a site allocated for housing in a neighbourhood plan cannot be a community-led exception site.</p> <p>Apart from exception sites, I cannot find anything in the NPPF that refers to “100% affordable housing sites”.</p>
Para 70	<p>While agreements may have been made with landowners, landowners can change. It is also a core principle of the English planning system that planning permission is tied to the land and not the individual. As noted above, it does not appear to be consistent with national policy to seek affordable housing for what are classed as minor developments.</p>

Section	Our comments
Policy 1d	<p><i>"First Homes and those delivered through a Section 106 agreement should be first offered to eligible people..."</i></p> <p>It's not clear, but is this referring to all affordable homes?</p> <p><i>"Affordable housing is also supported within the Cranborne Chase National Landscape, subject to not adversely impacting on the environmental and vistas of local importance..."</i></p> <p>Presumably "environment" rather than "environmental". Are "vistas of local importance" defined anywhere?</p> <p><i>"Applications by Community-led developments..."</i></p> <p>Probably better to say: "Applications for Community-led developments..."</p>
Allocated sites (policies 1e to 1h)	<p>The Council's Transport Planning team have replied to say:</p> <p>These sites are all remote from Shaftesbury with no bus service and likely to be car dependent. All planning applications for these sites would need to consider access by active travel modes for daily journeys e.g. to local amenities, education, employment, leisure etc.... and would be required to financially contribute towards transport improvements mentioned in Policies 4a and 4b where necessary.</p> <p>The Planning Policy team have similar concerns. The sites selected by the NPSG as being suitable for development are generally not ones that we would normally support due to their poor accessibility in terms of walking, cycling and use of public transport in order to access day-to-day services and facilities. As we are not aware of any realistic proposals to provide safe pedestrian and cycleways between the sites and facilities (which are primarily located in Shaftesbury), it seems highly probable that the sites will be entirely car dependent. While national policy encourages development in "sustainable locations" (NPPF para 11d), we also recognise in rural areas policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs (NPPF para 82–83) and that opportunities to maximise sustainable transport solutions will vary between urban and rural areas (NPPF para</p>

Section	Our comments
	110). As such, due to the limited size of the proposed sites (3 to 10 dwellings), we will not be objecting to the proposed allocations on location grounds.
Policy 1e	<p>Notwithstanding the comments above regarding national policy stating the affordable housing should not be sought for minor development, the policy appears to make no exception for situations where it is not viable to deliver 100% affordable housing on this site. While NPPF para 76 describes exceptions sites and not allocated sites, it allows for a proportion of market homes “where essential to enable the delivery of affordable units without grant funding.” In the absence of any detailed viability work, it would seem sensible to add a similar clause to this policy.</p> <p>There remain outstanding questions about whether this site is actually deliverable in the form set out in this policy. Is there a group in the community that have expressed an interest in developing the site? Are there sources of funding available for this type of development? Has the current owner (who we understand to be the owner/occupier) expressed an interest in making the site available in the short term, and at a price that will make a community-led scheme for 100% affordable housing viable?</p>
Policy 1f	<p>We note that this site is in the AONB/National Landscape and, therefore, is within a designated rural area referred to in NPPF para 65. In such a location, the North Dorset Local Plan (2016), Policy 8, requires a financial contribution towards affordable housing for schemes of 6 to 10 dwellings, and would not require more than a 40% contribution. This policy / site allocation goes beyond that by requiring 50% on-site affordable housing for a scheme of 4 dwellings. However, it is noted that the response made on behalf of the owners of the site does not object to the 50% on-site affordable housing requirement (albeit the response does suggest the affordable housing should be discounted market sales housing).</p>
Policy 1f(viii)	<p>There appears to be an error with the roman numerals – presumably this item should be vii (7) and the next item viii (8).</p>

Section	Our comments
Policy 1f(ix)	<p>The policy requires an archaeological assessment prior to development.</p> <p>The County Archaeologist has replied to say: “there is a recorded burial of a child, thought to date from the Roman period, recorded to the east of that site. It was found in 1916, so its position might not have been recorded accurately. It would depend on what development is proposed here, but I suspect that a <u>pre-determination archaeological evaluation</u> could be appropriate if a planning application were submitted.”</p>
Paras 91 and 94	<p>Reference is made to “permanent development”, the opposite of which is presumably “temporary development”. However I don’t think that is what is meant here. “Development” in planning terms refers to both construction and to material change of use of land and buildings. What is being proposed here would be permanent development in the sense of change of use from farmland to recreation / public open space.</p>
Para 97	<p>This refers to 5 affordable homes (i.e. 50%), however Policy 1g(ii) refers to 40%.</p>
Policy 1g	<p>Part (viii) of the policy requires the southern section to be developed at the same time as the northern section. As this is a key part of the policy, it might be clearer if this requirement was stated in the first paragraph of the policy text.</p>
Policy 1g(iii)	<p>Typo: “All properties should have to access to private gardens.”</p>
Policy 1g(iv)	<p>A modern village hall would come at considerable cost. Is there any evidence to suggest that a scheme of 10 dwellings would make such a requirement viable? Our experience at the nearby village of Bourton has been that developers required a scheme of 30 dwellings (with a lower 10% affordable) in order to make it viable to deliver a village hall (application ref: P/FUL/2021/04282). An alternative scheme for the full policy requirement of 40% affordable housing meant that delivery of the village hall was not viable (ref: P/OUT/2023/06654).</p>

Section	Our comments
Policy 1h(ii)	<p>It is understood from the supporting text that the parish council is the current landowner of this site. They could develop the site and direct the profits to another village hall, or they could sell the site to a developer and include a legal covenant requiring the purchaser to do something similar. Therefore, a Section 106 agreement would seem unnecessary and would be difficult to draft under the rules laid out in NPPF para 58. The phrase “any profit” is going to be problematic as all developers need to make a profit in order to justify the financial risk of taking on development. It’s also unclear how this requirement will work chronologically as part (i) of the policy requires the replacement village hall to be in place before this site can be released, so it would seem too late for the profits of this site to go towards providing a new village hall. Maybe the money (if any) would go towards the upkeep and maintenance and/or future enhancements of the new village hall. As the parish council should be in control of the profits (if any), we recommend that this part of the policy is deleted.</p>
Para 118, 2 nd bullet point	<p>SSSI is considered a national rather than an international designation. SAC is considered to be an international designation.</p>
Paras 121 and 123	<p>These paragraphs could be updated to reflect the fact that the requirement for 10% biodiversity net gain is now in place.</p>
Para 124	<p>It’s not clear what the connection is between reliance on septic tanks in the parish and SUDS. The former deals with foul (sewage) water, while the latter typically deals with surface water (i.e. rainwater collected from roofs and other impermeable surfaces). In most circumstances it is best to keep the two types of water separate as surface water can be emptied into a local watercourse with the minimal of processing, whereas foul water requires a significant amount of processing before it can do the same.</p>
Policy 2a(iii)	<p>“Materials used should consider how best to promote a circular economy so that they can be easily recycled or reused (see “Policy 4e. Energy” on page 71). <u>For existing buildings, this means that any buildings converted or re-developed should not require major,</u></p>

Section	Our comments
	<p><u>additional construction works other than to support the safety and maintenance of the existing structure and materials;</u></p> <p>The second sentence, as underlined above, appears to be overly restrictive and inflexible. The level of construction work required to convert a building will depend on the nature of the conversion, in particular, the starting and finishing positions. Limiting work to that which will support the safety and/or maintenance will severely restrict the scope of any future conversion project, many of which are vital to ensure that older buildings continue to find viable uses.</p>
Policy 2a(viii)	<p>Is it necessary to require “large gardens” in “all new development”? Not everyone will require a large garden or will have the time / resources to maintain one. This policy seems too inflexible.</p> <p>What is meant by “safe”? This suggests tall panel fences instead of native hedges and so may contradict the objectives of Policy 2b.</p>
Policy 2b(i)	<p><i>“Setting development within <u>generous</u> plantings of native trees and hedgerows”</i></p> <p>What is meant by “generous” plantings here? This gives the impression that each development needs to be surrounded by several rows of trees which sounds unreasonable and wouldn’t necessarily be in keeping with the area. A simple requirement for native street trees and hedgerows would seem more reasonable and proportionate.</p>
Policy 2b(ii)	<p>Note that national policy is already stronger than this with regards to protection of ancient woodland. NPPF para 193(c) states that development resulting in loss of ancient woodland and veteran trees should be refused unless there are wholly exceptional reasons.</p>
Policy 2b(iii)	<p><i>“...designated area for tree planting in the Neighbourhood Area;”</i></p> <p>Have such areas been defined or are there plans to define them?</p>
Policy 2b(v)	<p>This requires a tree survey. Should the requirement be prefixed with “Where appropriate” to allow for sites that don’t currently have any trees?</p>

Section	Our comments
Policy 2c(iii)	<p><i>“Development should be sensitive to views of the Local Vista Impact Zones (LIZs) indicated in Figure 25 - Figure 46 due to their sensitivity to adverse landscape impacts from development <u>and state in their application</u>. All development with a visual impact on the Cranborne Chase National Landscape or the LIZs should include mitigation measures that detail the scope of these impacts and how they have been mitigated in a Landscape and Visual Impact Assessment (LVIA).”</i></p> <p>The words underlined above don’t make any sense on their own as it’s not clear what is meant to be stated. Suggest deleting them.</p>
LIZ2a, second paragraph, page 44	<p><i>“Both of the <u>site</u> along the A30/B3081 are visible from two key fixed points in the area, <u>Win Green</u> and Melbury Beacon.”</i></p> <p>Typo as presumably should be “sites”.</p> <p>I’m confused by the reference to Win Green here – this is approximately 5km to the east of Melbury Beacon and therefore would be a different viewing starting point. It is also outside the neighbourhood area and is in Wiltshire – see Figure 47 on page 53 for its location.</p>
LIZ7b, Figure 39, page 49	<p>As the view is meant to be from Duncliffe Wood, the green star appears to be in the wrong place on the map.</p>
LIZ8, Figure 41, page 50	<p>I’m unsure whether the green star is in the wrong place or whether the purple triangle needs adjusting slightly.</p>
Policy 2d(i)	<p><i>“There is an expectation that measures to enhance ecological networks will contribute to at least a proven 10% net gain in biodiversity (subject to stated exceptions in planning practice guidance)”</i></p> <p>I’m confused by what is meant by this policy. I’m assuming this is intended to implement biodiversity net gain. However, BNG is a legal requirement and therefore there is no need to require it again in policy. Secondly, the preference is for BNG improvements to be made on the site</p>

Section	Our comments
	of the proposed development, and therefore will not necessarily relate well to the enhancement of identified ecological networks.
Policy 2d(ii)	<p><i>"Proposals must demonstrate how they contribute to existing and potential ecological networks as set out in the DERC ecological network maps (accessible on Dorset Explorer);"</i></p> <p>As above, it's not clear why they must do this if BNG improvements are being made on site.</p>
Policy 2d(iii)	<p><i>"Tree and woodland management must be sensitive to other ecological considerations, such as protecting chalk downland;"</i></p> <p>This policy could perhaps do with further explanation, particularly as Policy 2b requires "generous planting of native trees".</p>
Policy 2d(iv)	<p><i>"Development must not result in any temporary or permanent adverse effect on the watercourse/s;"</i></p> <p>It's not clear what is meant by an adverse effect in this context. However, if it is pollution, then this is controlled by other regimes separate from the planning system. NPPF paragraph 201 states:</p> <p><i>"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively."</i></p> <p>This suggests deleting this policy as it strays beyond the scope of land use planning.</p>
Policy 2d(v) and (vii)	<p><i>"Ecological impacts must be captured in a baseline assessment and include provision to regularly assess mitigation measures;"</i></p> <p><i>"All developments should demonstrate how they ensure biodiversity gain consistent with the British Standard for Biodiversity."</i></p> <p>Again, these paragraphs are referring to BNG which has an established mechanism and therefore additional neighbourhood plan policy is not</p>

Section	Our comments
	considered necessary. There is also a jump in the roman numerals (missing vi).
Policy 2e(i)	<p><i>"The potential features that should be preserved and enhanced are detailed in MA&CNP38 ii) Non-Designated ii) Listed Heritage Assets and iii) Heritage Impacts of Site Allocations⁵³ evidence base."</i></p> <p>The name of the evidence base document here is oddly constructed, consisting of a number of roman numerals. You have to refer to endnote 53 to see that it is actually a reference to the Heritage Topic Guide. It would seem simpler and easier if this title could be used in the policy text.</p>
Policy 2e(iii)	<p><i>"Proposals to bring redundant and/or vacant historic buildings into reuse will be supported, subject to the conditions above being met in conjunction with other policies in this plan."</i></p> <p>Suggest there may be some missing words to this policy – suggested missing words highlighted above.</p>
Para 148	<p><i>"Engagement with the Compton Abbas Airfield suggests that tourism accommodation may be required to encourage business..."</i></p> <p>Suggest there may be a missing word to this policy – suggested missing word highlighted above.</p>
Policy 3a	Policy noted. No comments.
Objective on page 59 and para 153	<p><i>"Objective: To ensure that <u>development gain</u> arising from mixed development along the A30 accrues to the Parish Council"</i></p> <p>As noted above, we consider the phrase "development gain" unhelpful in this context. As North Dorset does not have CIL, only Section 106 money can be collected, and this is limited to making the development acceptable in planning terms.</p>

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Policy 3b	Policy noted, however, as noted in para151, reserved matters have already been approved. However, potentially that permission could lapse in which case this policy might then be appropriate.
Para 159	In the submitted version of the plan there are just three proposed LGS sites.
Para 168	<p>“...though this is expected to be <u>minumal</u> as the site is allocated for affordable housing for those with a local connection (with the land expected to [be] retained in stewardship by the community).”</p> <p>Typo and missing word.</p>
Paras 182-183, and Transport Topic Paper	Transport Planning team write: “Dorset Council’s position on the Shaftesbury Eastern Bypass hasn’t changed since 2019 as it is still highly unlikely that there will be funding coming forward to deliver this link. We will continue to look at options on the A350 and C13 to improve the movement of HGV traffic and improve overall road safety on these routes as mentioned under Policy 4b.
Policy 4a	Transport Planning team write: “We support this policy approach [to encourage sustainable transport links through accessible and safe rights of way in the Neighbourhood area] and would look to secure developer funding for improvements where required.
Policy 4a(vi)	The policy states: “ <i>development should support new footpath and cycle routes identified in Figure 61,</i> ” however Figure 61 appears to show existing rights of way rather than possible new ones. In any case, the map in Figure 62 would appear to be clearer.
Figure 62, page 68	The Council’s Definitive Map team ask for a disclaimer to be added to the rights of way map on page 68 to say “This map is not definitive and has no legal status”, in case it is misinterpreted.
Policy 4b	Transport Planning team write: “We support this policy approach [to resolve problems caused by heavy through traffic] and will continue to

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	work with the local community to identify problem areas highlighted through traffic data/evidence (e.g. collision data) and help to secure developer funding through the planning process for required transport improvements relating to new development in the Neighbourhood Plan Area."
Policy 4c(ii)	This policy consists of a list, and therefore part (ii) needs to be rewritten to "Provision is made for high-speed communications infrastructure..."
Policy 4c(iii)	As stated above, we think it is unhelpful and misleading to use the phrase "development gain" in this context. Section 106 money is spent where it is needed to make development acceptable in planning terms, and therefore cannot usually be split proportionately between parish areas. If CIL (or its successors) are adopted in this area, then money will be distributed to parishes according to the legal rules in place.
Policy 4d	The second paragraph begins " <i>The loss of a community building will only be acceptable where:</i> " and then there is a list of four items, with "and" at the end of the penultimate item, which suggests that all four parts must be met for a community building to be lost. However, part (i) talks about a replacement building being provided, so it's not obvious in that circumstance why part (ii) would need to be complied with, which requires evidence that the community building is no longer needed. This suggests the list should be an "or" type list. Parts (iii) and (iv) then make various requirements of a new community building and could probably usefully be brought out of the list and made into entirely separate paragraphs. It should also be noted that they potential contradict (i) which allows for an "equivalent" building, when in fact they appear to be specifying higher standards (accessibility and environmental/biodiversity improvements).
Policy 4e	<p>What's meant by a "<i>positive net benefit in energy efficiency</i>"? I assume it means an improvement over minimum building regulation standards.</p> <p>Is it necessary to include reference to "nature-related impacts" here given that this is dealt with in other parts of the plan.</p>

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	<p><i>“Where there are no listed building issues, all new build projects and extensions requiring planning consent should include technologies for the capture and utilisation of renewable energy, heating and energy storage.”</i></p> <p>This seems unnecessarily wordy; could it not be condensed to a requirement for “renewable energy technology”? In most cases this will be solar panels, which could conflict with the second paragraph of this policy (protecting landscape and heritage from the impact of such technology). For this reason, this third paragraph might have to be turned into a policy that encourages rather than requires. This would also help with viability concerns, particularly if energy storage is going to be a consideration (I understand that storage batteries are still relatively costly, and certain groups have concerns regarding their safety).</p> <p>The requirement for EV charging points has been overtaken by Part S of building regulations, and so can be removed from the policy.</p>
Policy 4f	<p>Title of policy should presumably be “Sustainable ground-mounted <u>PV</u>”.</p> <p>It’s not clear why this limit of 20 solar panels has been chosen. There is no reference to this in the supporting text. The key consideration should be the impact on the landscape rather than the size. This appears to be a policy to provide a blanket ban on solar energy farms. In contrast, NPPF para 168(a) requires us to give significant weight to the benefits associated with renewable and low carbon energy generation. We therefore oppose this policy criteria as it appears to be chosen arbitrarily and contrary to national policy.</p> <p>Part (ii) requires the grid capacity to be assessed. While this is clearly a practical consideration, how relevant is it to determining whether a particular scheme is acceptable in planning terms? If there is a grid constraint that can’t be overcome, then common sense suggests that the development won’t proceed. We therefore object to this requirement.</p> <p>Part (iii) requires contribution to a “microgrid”. It’s not clear how this relates to part (ii) and the [national] grid capacity. Does a microgrid exist</p>

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	<p>in Melbury Abbas and Cann or nearby? I'm unsure why solar PV has to contribute towards a microgrid if there is national grid capacity, and this is the infrastructure most people rely on to keep the lights on.</p> <p>The other parts of the policy apply further criteria (such as previously-developed land, fully screened from any landscape area or highway or public right of way). Given the nature of the neighbourhood area, it seems highly unlikely that any suitable sites will be found. Therefore, instead of this being an enabling policy, overall it seems like a policy intended to restrict renewable energy development. We therefore do not feel it is in the spirit of planning for a net-zero economy by 2050 (as mentioned in supporting paragraph 162).</p>
Policy 4g	<p><i>"Developments requiring floodlights, security lights and street lights will not be supported (unless evolution in such technologies are supported by the National Landscape Management Group). This is particularly the case at large-scale employment sites, <u>including Guys Marsh HMP...</u>"</i></p> <p>A blanket ban on floodlights outside of the National Landscape, and particularly targeting an operational prison site, does not seem proportionate or realistic. A policy that aims to limit the impact of light pollution (in line with NPPF para 198c) might be more appropriate.</p> <p><i>"Air quality issues should be duly considered and addressed in any planning application."</i></p> <p>While the issue of air pollution is briefly mentioned in paragraph 174 ("The Neighbourhood Area has modest amounts of air pollution for a rural parish"), the area isn't a designated Air Quality Management Area, and therefore this policy requirement appears disproportionate, particularly as it applies to any planning application in any part of the neighbourhood area. At the very least, the supporting text should provide guidance on how this part of the policy can be complied with. For reference, NPPF para 199 covers air pollution.</p>

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Policy 4h	<p>The title of this policy mentions “water efficiency” but it’s not obvious that this is covered by the policy.</p> <p><i>“Support for community-based hydro-electric schemes would be supported...”</i></p> <p>How is “community-based” being defined here? For example, if a scheme was proposed by a local business, such as Stoates Mill as described in para 124, would that meet the criteria? What about a local individual?</p> <p>The policy refers to “Sustainable Urban Drainage”, however the NPPF glossary uses the term “Sustainable Drainage System” which should probably be the preferred term here given the rural nature of much of the plan area. The primary purpose of them is to control surface water run off. They therefore may be required anywhere, and not just in locations identified at risk from surface water flooding. Biodiversity features, while obviously desirable, must be a secondary consideration in comparison to their primary purpose.</p>
Policy 4i	<p>The policy provides a list with three parts and an “and” in the penultimate item, suggesting that all three parts must be met for planning permission to be granted on an LGS site. However, part (ii) is about controlling development “adjoining these open spaces”. It’s not clear how this criterion can be met if the proposed scheme doesn’t include development adjoining the open space. In the spirit of NPPF para 16d (“policies that are clearly written and unambiguous”) I suggest this policy could be made much shorter and simpler, in line with LGS policies in other neighbourhood plans, along the lines of:</p> <p><i>“The outdoor recreation and amenity areas on the LGS proposals map (Figure 66 on page 74) are designated as Local Green Spaces due to their particular local significance for the community and their recreational, historic and/or environmental value.</i></p> <p><i>“Inappropriate development will not be permitted unless justified by very special circumstances. In the case of Boyne Hollow, the LGS</i></p>

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	<i>designation must not affect the capacity of Wessex Water to provide essential maintenance and services to the local area."</i>
Table 6	It would be better and more transparent if in the column titled "2" the special attribute(s) of each site could be listed (e.g. beauty, historic value, recreation, tranquillity, wildlife etc.)
Table 6, LGS1	We wouldn't normally accept agricultural fields as LGS, although we note that this one is occasionally used by the community for village hall events. As such, we won't object.
Table 6, LGS3	<p>"(*NB: not all of the site may be proposed as an LGS; MA&CNP38 steering group currently engaged with Wessex Water to determine details of allocation)"</p> <p>The NPSG/QB must confirm whether talks with Wessex Water have finished and the outcome before the designation can proceed.</p>
Para 190	While a commitment to an "annual monitoring report" is admirable, we're unaware of other QBs that have done this. We question whether there are sufficient volunteers within the parish to do this, particularly given the extended period of time it has taken from Regulation 14 consultation to Regulation 15 submission.
General	DC Senior Conservation Officer : "Overall, we are satisfied with the content of the MAaCNP, and its associated supporting technical and evidence base documents, and confirm that we have no further comments to make."
General / Design Guide	<p>DC Design Officer:</p> <p><i>Design Code policies in NP</i></p> <p>Reference to Design Guide in the policy is welcomed as this gives the policies full weight.</p> <p><i>Design Guide</i></p>

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	<p>Well considered and related to the landscape character assessments of the area and heritage.</p> <p>Codes are specific and measurable and include phrasing such as 'must'. Guidance is indicative and includes phrasing such as 'could' or 'should'.</p> <p>For example, the section 'Pattern and layout of buildings' only requires the first point to be implemented. The other 4 points are only should and an indicative drawing. This may be intentional as the remaining document refers to a mixture of musts and should, potentially due to the level or weight that the writer wishes to attribute to it.</p> <p>Consideration should be given to strengthening policies that are written as should, which are important to the community. Such policies are simpler to implement.</p> <p>Alternatively, the policy may not be upheld at appeal. Dorset Council has recently lost an appeal due to the balance between housing need in Dorset versus an appropriate design in a character area of Blandford, that has an adopted Design Code. The appeal decision indicates, those policies written as 'should' would not be upheld strongly if the housing provided in any development sought to bolster the current lack of housing land supply in Dorset.</p> <p>The figures in the document are not described or referenced in the main text. As a result, it is not explicit if the image is a positive one that should be replicated or negative that should be avoided, etc. Each image should have an explanation.</p> <p>P.20 views – It would be useful to cross reference the map the green gaps and important views referred to.</p>