

Summary of responses to the Melbury Abbas and Cann Neighbourhood Plan (regulation 16 consultation)

17 October 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.

| No. | Organisation / Name | Date received |
|-----|------------------------------------|---------------|
| 1 | National Highways | 17 Apr 2025 |
| 2 | Natural England | 1 May 2025 |
| 3 | Historic England | 28 May 2025 |
| 4 | Environment Agency | 29 May 2025 |
| 5 | Ramblers (Dorset) | 26 May 2025 |
| 6 | Shaftesbury Town Council | 27 May 2025 |
| 7 | Cranborne Chase National Landscape | 28 May 2025 |
| 8 | B Hughes | 16 May 2025 |
| 9 | Brimble Lea | 21 May 2025 |
| 10 | Dorset Council | 30 May 2025 |

Summary of responses

| Person / organisation | Summary of comments |
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| <p>1. National Highways</p> | <p>We are 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.</p> <p>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.</p> |
| <p>2. Natural England</p> | <p>We do not have any specific comments on this neighbourhood plan.</p> <p>Regarding the Habitats Regulations Assessment (HRA) screening request, our advice is that significant effects on Habitats Sites are unlikely.</p> |
| <p>3. Historic England</p> | <p>Confirmation should be sought from Dorset Council's conservation team, as to the acceptability of the site allocation policies, and the Plan generally. There are no other issues associated with the Plan upon which we wish to comment.</p> |
| <p>4. Environment Agency</p> | <p>There are environmental constraints within our remit in the plan area, however we have no detailed bespoke comments to make at this consultation stage.</p> |
| <p>5. Ramblers (Dorset)</p> | <p>We fully support the objective of policy 4a (sustainable transport) to encourage sustainable transport links through accessible and safe rights of way.</p> <p>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.</p> <p>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.</p> |

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| | <p>The Ramblers would be happy to discuss any rights of way matters with the Parish Council.</p> |
| <p>6. Shaftesbury Town Council</p> | <p>We 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.</p> |
| <p>7. Cranborne Chase National Landscape</p> | <p>Although government has not formally adjusted the change of name to National Landscape (from AONB) 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.</p> <p>Section 85 of the CRoW Act 2000 (amended) applies to all relevant authorities, 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.</p> <p>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. 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.</p> <p>Figure 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 ?</p> <p>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.</p> <p>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</p> |

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.

8. B Hughes

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.

9. Brimble Lea

On behalf of the owners of 'Land South of Melbury Motors' subject to Policy 1f as referenced in figure 15 and paragraphs 81–88 and the proposed allocation subject to Policy 1f as set out on pages 23–24 of the Neighbourhood Plan. 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. The site has been subject to an application for planning permission (which was subsequently withdrawn). Then the competent Highway Authority (Dorset County Council) confirmed there were no plans for any physical improvements to be made to the road junction.

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 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. We request 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'.

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.

10. Dorset Council We welcome progress of the Melbury Abbas and Cann neighbourhood plan, and supports its vision and objectives. We hope that our comments are seen as constructive and help to finalise the plan ready for referendum – see table below.

| Section | Dorset Council comments |
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| Table of contents | Unexplained jump in section numbering between Section 10 (Achieving sustainable development) and Section 13 (Housing). |
| Para 4 | 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. |
| Para 6 | 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 | "1,1350 residents" – maybe this should read "1,350 residents". |
| 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. The area now has planning consent for a residential led scheme.</p> |
| Para 28 | <p>"with a 1,793 net additional dwellings across Dorset per annum to 2038"</p> <p>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. Also, the local plan period is likely to be extended to at least 2042 to allow for 15 years from the date of adoption.</p> |

| Section | Dorset Council comments |
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| 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.</p> <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 '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> |

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| Para 55 | <p>“Development of these two [?] on B3081 or the adjacent Persimmon site on the A30”</p> <p>We 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.</p> |
| Figure 10 | <p>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.</p> |
| 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>“Sites do not lead to the destruction of existing trees and hedges...”</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 figures consist of a sum of: completions since the beginning of the plan period (2021); extant planning permissions; adopted housing allocations;</p> |

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| | capacity of major windfall SHLAA sites within settlement boundaries; and a windfall allowance for minor sites based on recent completion rates. |
| 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>Unsure if 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 69 | <p><i>“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>.”</i></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. 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. Apart from exception sites, I cannot find anything in the NPPF that refers to “100% affordable housing sites”.</p> |
| Para 70 | 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. |
| 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> |

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| | <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>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> |
| Policy 1e | <p>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</p> |

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| | housing requirement (albeit the response does suggest the affordable housing should be discounted market sales housing). |
| Policy 1f(viii) | There appears to be an error with the roman numerals – presumably this item should be vii (7) and the next item viii (8). |
| Policy 1f(ix) | <p>The policy requires an archaeological assessment prior to development.</p> <p>The County Archaeologist writes: “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.</p> <p>“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 | This refers to 5 affordable homes (i.e. 50%), however Policy 1g(ii) refers to 40%. |
| Policy 1g | 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. |
| Policy 1g(iii) | Typo: “All properties should have to access to private gardens.” |
| Policy 1g(iv) | 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? |
| 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</p> |

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| | <p>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> |
| <p>Para 118, 2nd bullet point</p> | <p>SSSI is considered a national rather than an international designation. SAC is considered to be an international designation.</p> |
| <p>Paras 121 and 123</p> | <p>These paragraphs could be updated to reflect the fact that the requirement for 10% biodiversity net gain is now in place.</p> |
| <p>Para 124</p> | <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> |
| <p>Policy 2a(iii)</p> | <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, 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> |
| <p>Policy 2a(viii)</p> | <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> |

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| | <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> |
| <p>Policy 2b(i)</p> | <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> |
| <p>Policy 2b(ii)</p> | <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> |
| <p>Policy 2b(iii)</p> | <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> |
| <p>Policy 2b(v)</p> | <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> |
| <p>Policy 2c(iii)</p> | <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> |
| <p>LIZ2a, second paragraph, page 44</p> | <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</p> |

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| | also outside the neighbourhood area and is in Wiltshire – see Figure 47 on page 53 for its location. |
| LIZ7b, Figure 39, page 49 | As the view is meant to be from Duncliffe Wood, the green star appears to be in the wrong place on the map. |
| LIZ8, Figure 41, page 50 | I'm unsure whether the green star is in the wrong place or whether the purple triangle needs adjusting slightly. |
| 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>We're 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 of the proposed development, and therefore will not necessarily relate well to the enhancement of identified ecological networks.</p> |
| 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>“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</p> |

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| | <p>or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”</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 considered necessary. There is also a jump in the roman numerals (missing vi).</p> |
| 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> |
| 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> |

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| | 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. |
| 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>minimal</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 | Our 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 | 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 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 |

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| | 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) | 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> <p style="text-align: center;"><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</p> |

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| | <p>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 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> |

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| 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> |
| 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</p> |

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| | <p>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 designation must not affect the capacity of Wessex Water to provide essential maintenance and services to the local area.”</i></p> |
| 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. |

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| Conservation | <p>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.”</p> |
| Design Guide | <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> <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’. 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>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> |