Shillingstone Neighbourhood Plan 2025 Review

Responses to the Regulation 16 consultation

27 July 2026

Submission of the modified plan under Regulation 15 was completed on 27 May 2026. The Regulation 16 consultation was held between 12 June and 24 July 2026 (6 weeks). Ten responses were received, as detailed in the table of contents below.

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* Includes Dorset Council's Modification Statement

Representation number: 1

From: Gaynor Gallacher, Assistant Spatial Planner

Organisation: National Highways

Submitted: 15 June 2026

Method of submission: Email

Comments:-

Thank you for providing National Highways with the opportunity to comment on the submission version and modifications in respect of the Shillingstone Neighbourhood Plan First Review covering the period 2025-2031. As you are aware, National Highways is the highways authority responsible for operating, maintaining and improving the strategic road network (SRN). In this location the SRN comprises the A303 and A31/A35 corridors which pass approximately 22km and 18-25km to the north and south respectively of the plan area.

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 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: 2

From: Rosalind Tuck, Higher Officer, Sustainable Development

Organisation: Natural England

Submitted: 3 July 2026

Method of submission: Email

Comments:-

Thank you for consulting Natural England on the Shillingstone Neighbourhood Plan.

Please find our response attached.

ATTACHED FILE FOLLOWS OVER THE NEXT 5 PAGES

Date: 03 July 2026
Our ref: 551020

philip.reese@dorsetcouncil.gov.uk
BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Philip Reece,

Dorset Council - Shillingstone Neighbourhood Plan - Review - Regulation 16 Consultation

Thank you for your consultation on the above dated 12 June 2026

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

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 draft neighbourhood plan.

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.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Rosalind Tuck
Higher Officer Sustainable Development
Wessex Area Team
Natural England

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

Natural environment information sources

The Magic[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 .

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[4] website and also from the LandIS website[5], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[6] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[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. 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 should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric for more information. For small development sites, 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: 3

From: David Stuart, Historic Places Adviser

Organisation: Historic England

Submitted: 23 July 2026

Method of submission: Email

Comments:-

Thank you for your Regulation 16 consultation on the submitted version of the Shillingstone Neighbourhood Plan Review.

I can confirm that there are no issues associated with the Plan upon which we wish to comment.

I attach our Regulation 14 consultation response for information.

Attached Regulation 14 response:-

FAO Shillingstone Parish Clerk

Thank you for your Regulation 14 consultation on the Shillingstone Parish Neighbourhood Plan Review.

We have become aware of the new Plan's genesis through the consultation received on the associated SEA Screening in the spring of this year.

We note the emphasis that has been placed on learning from the previous Plan and refining and finessing extant policies so that the special historic character of the Plan area can be best protected and enhanced. This is assisted by enhanced contextual evidence, such as the Landscape and Heritage Study undertaken by Dorset Council, which identifies sensitivities in the area and provides guidance on how these should be respected and accommodated.

While three of the original sites allocated have now been developed, itself a testament to the applicability of the initial Plan, the validity of the remaining sites has been reaffirmed and site allocation policies updated to reflect relevant additional considerations.

As a consequence, there is little we would wish to offer in the way of detailed comment, and would therefore want only to congratulate your community on its sustained interest in and commitment to the existence of a meaningful Neighbourhood Plan for its area.

Our best wishes to your community for the eventual making of its new Plan.

Representation number: 4

From: Ololade Ashade, Planning Advisor

Organisation: Environment Agency

Submitted: 23 July 2026

Method of submission: Email

Comments:-

Thank you for consulting the Environment Agency on the Regulation 16 consultation for the Shillingstone Neighbourhood Plan. Based on the environmental constraints within the allocated area, we have no detailed comments to make in relation to your plan. We provide our comments as follows:

Environmental Net Gain and biodiversity

Biodiversity Net Gain is already established in the National Planning Policy Framework paragraphs 174d, 179b and 180d., for new developments and planning policies. Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain from an as yet unconfirmed date, expected to be in November 2023. As part of the government's Environmental Improvement Plan 2023 and 25 Year Environment Plan there is also the target to incorporate wider Environmental Net Gain into our planning decisions and strategic planning. Your plan should consider opportunities for how these requirements can be met and preferably where your plan can go beyond any minimum requirements to deliver environmental net gains.

Strategic water planning

In February 2011, the Government signalled its belief that more locally focussed decision making and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive. This seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- to encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment. You can find more information

on the challenges that threaten the water environment and how these challenges can be managed for your plan area in your River Basin Management Plan.

Drainage and wastewater infrastructure

Where your plan proposes development or promotes growth, we recommend early consultation with the Wessex water. Your plan should determine whether there is (or will be prior to occupation) sufficient infrastructure capacity existing for the connection, conveyance, treatment and disposal of quantity and quality of water associated with any proposed development within environmental limits of the receiving waterbody.

This may impact on the housing figures and the phasing of development. Please note that if there is not sufficient capacity in the infrastructure then we must be consulted again if alternative methods of disposal proposed.

Closing

We encourage you to seek ways in which your neighbourhood plan can improve the local environment at the earliest stages. Together with Natural England, English Heritage and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environmental into your plan. This is available at: https://neighbourhoodplanning.org/toolkits-andguidance/consider-environment neighbourhood-plans/

Representation number: 5

From: Richard Brown, Landscape Planning Officer

Organisation: Dorset National Landscape

Submitted: 23 June 2026

Method of submission: Email

Comments:-

Dorset National Landscape Team welcomes the opportunity to comment on the submission draft of the revised Shillingstone Parish Neighbourhood Plan. We recognise the work undertaken by Shillingstone Parish Council and its Steering Group in preparing the review, supported by professional input and informed by community engagement.

We are broadly supportive of the reviewed Neighbourhood Plan. The Plan demonstrates a clear intention to guide development in a way that protects and reinforces Shillingstone's distinct rural character, landscape setting and sense of place. The approach to updating policies without fundamentally altering the nature of the Plan is considered proportionate and appropriate.

The Plan appropriately recognises that part of the parish lies within the Dorset National Landscape and that the wider area contributes to its setting. The requirement for development to respond to its rural context and be informed by the Dorset National Landscape Management Plan is strongly supported.

The Plan's approach to growth is welcomed. It does not allocate additional development sites and demonstrates that sufficient housing supply already exists to meet local needs within the current plan period. This represents a measured and landscape-sensitive approach, consistent with national policy and the purpose of the National Landscape designation.

The Plan includes a strong landscape-led framework, supported by character assessment work and clear design guidance. This helps ensure that development proposals respond positively to local distinctiveness, built form and landscape context.

The designation of Local Green Spaces is a significant strength of the Plan, helping to protect important open spaces, views and the relationship between the village and the surrounding countryside. This contributes positively to maintaining settlement identity and rural character.

Policy relating to design and character is comprehensive and provides a strong basis for achieving high-quality development. The emphasis on scale, massing, materials and landscape integration is supported. The Plan also recognises important elements such as tranquillity, rural lanes and the valley setting. These are fundamental to the character of the National Landscape. Consideration could be given to strengthening references to dark skies and the avoidance of urbanising influences.

Based on the available evidence, the Plan does not present a significant risk of excessive development that might adversely impact the National Landscape. Growth is clearly managed and proportionate, and the Plan does not promote further expansion beyond existing aspirations. Future pressures may arise through wider planning applications, but the Plan provides a reasonable framework for managing such proposals.

Overall, Dorset National Landscape Team supports the overall direction and content of the revised Plan, welcomes its emphasis on landscape and local distinctiveness.

Representation number: 6

From: Anne Powell

Organisation:

Submitted: 18 June 2026

Method of submission: Online

Comments:-

I support this Neighbourhood Plan. It has been carefully prepared, building on the previous plan, by a team who well-understand our community and its needs. The people who worked on it are very in-touch with all local organisations and groups and are people who have long-term committment to the future of the village.

Representation number: 7

From: Christopher Hart

Organisation:

Submitted: 27 June 2026

Method of submission: Online

Comments:-

Please find attached my Regulation 16 representation in respect of the Shillingstone Neighbourhood Plan Review.

I request that this submission, together with its evidence appendix, be placed before the Independent Examiner in full.

The representation raises substantive concerns regarding the proposed modification of Policy 3, particularly the effect of the revised wording on design control, local character, the Conservation Area, and whether the proposed changes alter the nature of the made Neighbourhood Plan.

I would be grateful if you could confirm receipt and confirm that the attached representation will be included within the examination material.

ATTACHED FILE FOLLOWS OVER THE NEXT 12 PAGES

REGULATION 16 REPRESENTATION

Shillingstone Neighbourhood Plan Review
Submission to Dorset Council and the Independent Examiner

Submitted by: CHRISTOPHER HART
Address: [redacted]
Date: 26 June 2026

Subject: Objection to the proposed modification of Policy 3 and request that the Examiner determine that the proposed modifications alter the nature of the made Neighbourhood Plan and require a referendum

Dear Sir or Madam,

I submit this representation in response to the Shillingstone Neighbourhood Plan Review.

I object to the proposed modifications to Policy 3, The Character and Design of New Development, and request that the Independent Examiner determine that the proposed modifications are so significant or substantial as to change the nature of the made Neighbourhood Plan.

Accordingly, I request that the revised Plan should not be made without a further referendum.

In the alternative, if the Examiner is not minded to require a referendum, I request that Policy 3 be materially amended to make clear that sustainability measures may supplement, but must not override, the existing character, heritage, vernacular, scale, massing, materials and conservation requirements of the made Plan.

1. Summary of objection

The proposed modification to Policy 3 is presented as a clarification and sustainability update. In substance, it changes the operation of the policy.

The made 2017 Neighbourhood Plan was expressly concerned with protecting and enhancing the character of Shillingstone. Policy 3 is central to that purpose. The Plan was approved by local referendum and forms part of the statutory development plan.

The revised Policy 3 introduces a new policy route by which non-traditional or contemporary design may be justified on sustainability grounds. The key proposed wording states that:

“The design of new buildings to achieve higher environmental standards will be strongly supported and may justify taking a different approach to the traditional vernacular…”

That wording is not neutral. It changes the balance of the policy.

It permits an applicant to argue that a development which departs from traditional vernacular design should nevertheless be supported if environmental or sustainability credentials are advanced.

That is a substantive change to the practical operation of the Plan, particularly in the Shillingstone Conservation Area.

2. The made Plan gave Policy 3 a central protective function

The made 2017 Neighbourhood Plan was not merely a housing supply document. Its core purpose was to protect and enhance the character of Shillingstone and guide development so that it fits properly within the village.

The original Plan identified that much of Shillingstone is covered by Conservation Area designation, but that there had been no conservation area appraisal or design policy to guide development. The Neighbourhood Plan therefore filled that gap by providing local design guidance.

Policy 3 was the principal mechanism by which that gap was filled.

The original Policy 3 required development to contribute positively to Shillingstone's local identity and distinctive character. It required design to be in harmony with adjoining buildings and the relevant character zone as a whole. It required design cues to be taken from locally distinctive features in the character zone or historic core. It also required appropriate treatment of scale, mass, positioning, materials, detail, mature trees, hedgerows, landscaping and spacing.

That is not incidental wording. It is the operative protection for the village's character.

3. The proposed wording changes the legal and practical effect of Policy 3

The revised Policy 3 retains some original wording, but then introduces a new and materially different principle: that higher environmental standards may justify a different approach to traditional vernacular.

This creates an obvious planning argument for future applicants:

"This proposal may not follow the traditional vernacular, but it has sustainability benefits, therefore the departure is justified under Policy 3."

That argument is not available in the same way under the made 2017 Policy 3.

The concern is not with sustainability. Sustainability measures are welcome where they are properly integrated into locally responsive design. The concern is with the use of sustainability as a route to weaken or bypass the Plan's established character protections.

The modification therefore changes Policy 3 from a primarily character-protective policy into a balancing policy where sustainability may be used to justify departure from traditional design principles.

That is a substantive change.

4. The Modifications Statement understates the effect of the change

The Modifications Statement says that the proposed modifications are not so significant or substantial as to change the nature of the Plan.

I disagree.

The Statement says Policy 3 has been expanded to support design measures to reduce carbon use and waste and improve biodiversity and water efficiency. It further states that these additional design matters are not considered substantive.

That assessment fails to confront the legal effect of the actual wording.

The issue is not whether carbon reduction, biodiversity and water efficiency are acceptable planning objectives. They are.

The issue is whether the policy now permits a departure from traditional vernacular design where those objectives are relied upon.

It plainly does.

A modification that expressly allows a "different approach to the traditional vernacular" cannot properly be treated as a mere clarification. It changes the decision-making framework.

5. Anthorn demonstrates the practical danger

The recent Anthorn decision is directly relevant because it shows how Policy 3 operates in practice and why the proposed amendment matters.

Anthorn is located within the Shillingstone Conservation Area and within the Central Historic Core. It is also close to listed buildings.

The officer report accepted that the proposed dwelling was of contemporary design and of an architectural language seldom seen within the surrounding Conservation Area. The officer report further accepted that the design did not strictly accord with Local Plan Policy 24 and Shillingstone Neighbourhood Plan Policy 3.

Despite that, permission was granted.

Internal correspondence also shows that the planning officer recognised at an early stage that the built form, "although modern", could be acceptable with amendments. The officer also stated that the success of the scheme was "quite reliant" on being set back within tree coverage, and noted that the proposed material palette did not reflect what he had seen in the Shillingstone Conservation Area.

This is important.

Anthorn demonstrates that even under the existing made Policy 3, Dorset Council was prepared to approve a contemporary scheme which it accepted did not strictly accord with the Neighbourhood Plan's character and design policy.

The proposed revised Policy 3 would make such decisions easier to justify in future, because it expressly provides that higher environmental standards may justify departure from traditional vernacular design.

That is the loophole.

6. The effect is particularly serious in the Conservation Area

The central historic core of Shillingstone is not an ordinary planning context. It is the Conservation Area and contains listed buildings, historic cottages, traditional materials, mature trees, green spaces, views, rural lanes and heritage setting.

The statutory duty in relation to conservation areas requires special attention to be paid to the desirability of preserving or enhancing their character or appearance.

Policy 3 is one of the local mechanisms by which that duty is given practical effect in Shillingstone.

The revised wording weakens that mechanism by making character protection more subjective and easier to balance away.

The danger is not that every future contemporary building would automatically be approved. The danger is more subtle and more serious: objections based on traditional character, local materials, rural appearance and conservation setting will become easier to dismiss because applicants will point to sustainability features as justification for departure.

That risks making the Conservation Area less enforceable in practice.

7. The change affects the nature of the Plan

The question for the Examiner is not whether some original wording remains.

The question is whether the proposed modifications change the nature and practical operation of the Plan.

In my submission, they do.

The made Plan's design policy was one of the key tools by which residents secured protection for the distinctive character of Shillingstone. The proposed version changes that tool by adding a new justification for departure from traditional vernacular.

Where a neighbourhood plan's central purpose includes protecting local character, and its key design policy is altered to allow non-vernacular approaches to be justified on a new basis, that is not a minor or non-substantive change.

Nor is it merely a design code building upon the existing policy. It is a change to the evaluative balance within the policy itself.

The Plan approved by residents in 2017 did not contain this permissive sustainability/departure mechanism.

Residents are therefore being asked to accept a materially different policy framework without the same democratic safeguard.

8. Requested outcome

I request that the Independent Examiner determine that the proposed modifications to Policy 3 are so significant or substantial as to change the nature of the made Neighbourhood Plan.

On that basis, the revised Plan should proceed to referendum before being made.

If the Examiner is not minded to require a referendum, I request that the proposed wording be amended to remove the loophole by making clear that sustainability measures cannot justify development that would otherwise conflict with local character, heritage or conservation requirements.

9. Proposed alternative wording

I propose the following replacement wording for the relevant part of Policy 3:

“Sustainable design, energy efficiency, biodiversity enhancement, water efficiency and low-carbon construction measures will be supported where they are fully integrated into a design that remains in harmony with the relevant character zone, heritage setting, scale, massing, materials, detailing, landscaping and local distinctiveness of Shillingstone.

Such measures must supplement, and must not override or dilute, the character and design requirements of this policy. Sustainability benefits shall not, by themselves, justify development that would otherwise conflict with the character, appearance, heritage setting or vernacular qualities of the area, particularly within or affecting the Conservation Area.”

This wording would allow genuine sustainability improvements while preserving the protective function of the made Plan.

10. Further request for examination

Given the importance of Policy 3 to the made Plan, the sensitivity of the Conservation Area, and the evidence from recent decision-making at Anthorn, I request that the Examiner give specific written reasons on the following matters:

1. Whether the proposed Policy 3 wording materially changes the practical operation of the design policy.
2. Whether allowing sustainability objectives to justify a different approach to traditional vernacular changes the nature of the Plan.
3. Whether the proposed wording adequately protects the Conservation Area.
4. Whether a referendum is required.
5. Whether the proposed alternative wording, or similar wording, is necessary to preserve the character-protective function of the made Plan.
6. Conclusion

The issue is not opposition to sustainable design.

The issue is whether sustainability is being used as a drafting device to weaken a community-approved design policy.

The made 2017 Plan was approved by residents and became part of the development plan. Policy 3 was central to its purpose of protecting Shillingstone's local identity and distinctive character.

The proposed revised Policy 3 materially changes that protection by permitting departure from traditional vernacular where environmental standards are advanced.

The Anthorn decision shows why that matters in practice. Dorset Council has already approved a contemporary design in the Conservation Area despite accepting that it did not strictly accord with the existing Policy 3. The proposed modification would make similar outcomes easier to justify in future.

For those reasons, I ask the Examiner to find that the proposed modifications change the nature of the Plan and require a referendum.

Yours faithfully,

CHRISTOPHER HART

APPENDIX 1
EVIDENCE SCHEDULE

Shillingstone Neighbourhood Plan Review
Regulation 16 Representation

Submitted by: CHRISTOPHER HART
Address: [redacted]
Date: 27 June 2026

1. Purpose of this appendix

This appendix identifies the documents relied upon in support of my Regulation 16 representation.

The purpose of this appendix is not to repeat the full objection, but to show the evidential basis for the objection that the proposed changes to Policy 3 materially alter the nature and practical operation of the made Shillingstone Neighbourhood Plan.

2. Evidence relied upon

Document 1: Shillingstone Neighbourhood Plan, Made Version, February 2017

Relevant matters:

The 2017 Neighbourhood Plan was approved by referendum and became part of the development plan for the area.

The Plan stated that its main purpose was to protect and enhance the character of Shillingstone and ensure that development was designed to fit in well with the area.

The Plan stated that where it referred to “we” and “our”, this meant the people of Shillingstone, and that the document reflected the consensus of local residents.

Why this matters:

This establishes that the original Plan had democratic legitimacy and that character protection was not incidental. It was one of the central purposes of the Plan.

Document 2: Original Policy 3, The Character and Design of New Development

Relevant matters:

Original Policy 3 required development proposals to contribute positively to Shillingstone’s local identity and distinctive character.

It required development to be in harmony with adjoining buildings and the relevant character zone as a whole.

It required design cues to be taken from locally distinctive features noted in the character zone or historic core.

It required consideration of scale, mass, positioning, local materials, richness of detail, mature trees, hedgerows, landscaping and spacing appropriate to the rural character of the area.

Why this matters:

Policy 3 was the principal local policy mechanism protecting the character and design quality of new development in Shillingstone, including the Conservation Area.

Document 3: Shillingstone Parish Neighbourhood Plan First Review, 2025 Draft

Relevant matters:

The revised draft retains some of the original Policy 3 language but adds a new paragraph stating that the design of new buildings to achieve higher environmental standards will be strongly supported and may justify taking a different approach to the traditional vernacular.

The revised wording gives examples including passive solar gain, solar panels, thermally efficient materials, sedum roofs, grey water systems, air or ground source heat pumps and triple glazing.

Why this matters:

This is the central disputed change. It introduces a new policy route by which applicants may justify departure from traditional vernacular design by relying on sustainability credentials.

That changes the practical operation of Policy 3.

Document 4: Shillingstone Neighbourhood Plan Modifications Statement, March 2025

Relevant matters:

The Modifications Statement states that Policy 3 has been expanded to include reference to and support for design measures to reduce carbon use and waste, improve biodiversity and improve water efficiency.

The Statement says the Parish Council considers that the proposed modifications are not so significant or substantial as to change the nature of the Plan.

The Statement says the additional design matters are not considered a substantive change.

Why this matters:

The Modifications Statement understates the practical effect of the change. A policy wording that expressly allows departure from traditional vernacular is not merely clarification. It alters the evaluative balance applied to future planning applications.

Document 5: Dorset Council Officer Report, Anthorn, Blandford Road, Shillingstone, P/FUL/2024/07332

Relevant matters:

The officer report confirms that the Anthorn site is within the Shillingstone Conservation Area.

The report confirms that the site is within the Central Historic Core.

The report confirms proximity to listed buildings.

The report records that third-party objections included design, urban appearance, out of character, harm to the Conservation Area, conflict with the development plan, reliance on screening and concern regarding impartiality of the Parish Council.

The officer report states that the proposed dwelling is of contemporary design and of architectural language seldom seen within the surrounding Conservation Area.

The officer report states that the design does not strictly accord with Local Plan Policy 24 and Shillingstone Neighbourhood Plan Policy 3.

Despite this, the report recommends approval.

Why this matters:

Anthorn is a practical example of the risk created by weakening Policy 3. Dorset Council accepted that a contemporary design in the Conservation Area did not strictly accord with existing Policy 3, yet permission was still granted.

The proposed revised Policy 3 would make similar approvals easier to justify in future.

Document 6: Dorset Council Decision Notice, Anthorn, Blandford Road, Shillingstone, P/FUL/2024/07332

Relevant matters:

Planning permission was granted on 1 August 2025 for erection of one dwelling, ancillary workshop/store, parking, landscaping and associated works following demolition of the existing bungalow.

The permission was subject to conditions, including landscaping, ecology, arboricultural protection, materials, parking and construction method requirements.

The permission was also subject to a legal agreement dated 29 July 2025 relating to self-build and custom housebuilding.

Why this matters:

The decision notice confirms that the contemporary design was approved, despite the officer report acknowledging that it did not strictly accord with Policy 3.

Document 7: Section 106 / Unilateral Undertaking relating to Anthorn

Relevant matters:

The agreement was completed on 29 July 2025.

It relates to the self-build/custom housebuilding status of the approved dwelling.

It secures obligations concerning occupation and disposal during the protected period.

Why this matters:

This confirms that delay in issuing the decision was substantially linked to securing the legal agreement for the claimed self-build position. It should not be overstated as evidence that the application was deliberately delayed to await the Neighbourhood Plan review.

The relevance is narrower: it confirms the application was held open while officers were already minded to approve, and that the final permission was granted before the reviewed Plan had been made.

Document 8: Internal Dorset Council correspondence disclosed under EIR / FOI relating to Anthorn

Relevant matters:

The correspondence shows that the planning officer considered the built form, although modern, could be acceptable with amendments.

The officer stated that the success of the scheme was quite reliant on being set back within tree coverage.

The officer stated that he had not seen ashlar stone in the Shillingstone Conservation Area and that the area was characterised by reddish brick, stone with red brick bands, painted brick, painted stone and render.

The officer later stated that the Conservation Officer shared the view that the development was largely acceptable subject to changes to materials.

The officer also stated that Dorset Council had a policy of not accepting amendments and determining applications by the expiry date, but that he was happy to waive this if an extension of time was agreed.

The officer later stated that he was happy to grant permission based on the amended plans and would pre-emptively write the report for approval, subject to tree consultation and senior officer sign-off.

Why this matters:

This evidence shows that the Council worked proactively to make the application approvable, despite identified concerns about modern built form, reliance on screening and materials not characteristic of the Conservation Area.

This does not prove misconduct. However, it does demonstrate the planning risk created by a more permissive Policy 3. If the existing Policy 3 could already be treated flexibly in this way, the proposed revised wording would further weaken the practical enforceability of character protections.

Document 9: Secretary of State call-in correspondence

Relevant matters:

The Secretary of State decided not to call in the Anthorn application.

The letter states that the power to call in applications is used very selectively.

The letter confirms that the Secretary of State was content for the application to be determined by the local planning authority.

Why this matters:

A refusal to call in the application is not an endorsement of the merits of the decision. It simply leaves the matter to the local planning authority.

The call-in refusal should not be treated as validating the application's compliance with Policy 3 or the Conservation Area duties.

Document 10: Parish Council correspondence and delegated decision position

Relevant matters:

The Council's EIR response states that the application remained under delegated powers because no ward councillor requested call-in and the Parish Council's opinion was not contrary to the planning officer's view.

The Parish Council did not object to the Anthorn application.

Why this matters:

Parish Council support had a practical consequence. It removed one possible trigger for committee scrutiny.

This is relevant to the wider concern that controversial design decisions affecting the Conservation Area may proceed without sufficient public or democratic scrutiny.

3. Evidential conclusion

The documents show the following sequence:

1. The 2017 made Plan was approved by referendum and placed strong emphasis on protecting Shillingstone's local character.
2. Policy 3 was the principal local policy controlling design, character, materials, scale, massing, landscaping and rural appearance.
3. The 2025 draft introduces new wording allowing higher environmental standards to justify a different approach to traditional vernacular.
4. The Modifications Statement says this is not substantive.
5. The Anthorn decision shows why that is wrong.
6. Dorset Council approved a contemporary design in the Conservation Area despite accepting that it did not strictly accord with existing Policy 3.
7. Internal correspondence shows that officers recognised the modern form, reliance on screening and materials issue, but worked with the applicant to reach an approvable position.
8. The proposed revised Policy 3 would make similar future approvals easier to justify.

For these reasons, the proposed modification to Policy 3 is not merely clarification. It changes the practical effect of the Plan and should be treated as a modification that changes the nature of the Plan.

The Examiner is therefore requested to require a referendum, or alternatively require the Policy 3 wording to be amended so that sustainability measures supplement, but do not override or dilute, the existing character, vernacular, heritage and Conservation Area protections.

Representation number: 8

From: Robert Yorath

Organisation:

Submitted: 16 July 2026

Method of submission: Online

Comments:-

OBJECTION. 3.10 - 3.12, TABLE 2, P.15 OF SNP IGNORES ROAD SAFETY ISSUES IN THE MOST DANGEROUS PART OF THE VILLAGE NORTH OF PORTMAN HALL TO CO-OP., AND POPLAR HILL,(THE BUSY NARROW LANE FROM OKEFORD F. TO A357). IT IS MUCH MORE HAZARDOUS FOR ROAD USERS AND ESPECIALLY PEDESTRIANS, THAN THE SOUTHERN STRETCH WHERE 20MPH LIMIT IS PROPOSED, WITH GOOD VISIBILITY FROM JUNCTIONS, WIDE PAVEMENTS, HOUSES SET WELL BACK FROM HIGHWAY, AND SAFE FOR PEDESTRIANS TO CROSS.

PRIORITY SHOULD BE FOR NORTH OF THE PORTMAN HALL. THE ROAD IS NARROWER AND HAS BENDS; HAZARDOUS ACCESS AND EXIT AT FILLING STATION AND ANTELLS HAULAGE YARD. THE PAVEMENTS NARROW OR NON EXISTENT; THE LACK OF VISIBILITY FOR DRIVERS AND PEDESTRIANS EXITING THE 2 CHURCH ROAD JUNCTIONS AND FROM POPLAR HILL, EXITS FROM THE CROSS CUL DE SAC AND FROM THE CHURCH CENTRE CAR PARK IS BLIND. NO STREET LIGHTS; PEDESTRIANS, MANY ELDERLY, AT CONSIDERABLE RISK CROSSING A357 AS LIMITED VISIBILITY IN BOTH DIRECTIONS, TO FOOTPATH LESS THAN 1 METRE WIDE. THIS IS THE HISTORIC CENTRE, MANY HOUSES DIRECTLY BORDERING A357, - 5 LISTED. KNAPPS TO COOP, PAST FORUM SCHOOL, IS NOTORIOUS FOR SPEEDING AND OVERTAKING. MOST RECORDED INJURY ACCIDENTS, BUT FREQUENT NUMEROUS OTHERS. DAILY NEAR MISSES. 20 LIMIT AND TRAFFIC CALMING MEASURES LONG OVERDUE. ALMOST NOTHING DONE FOR 35+ YEARS, WHEN A BY PASS WAS PLANNED. ROAD DANGERS HAVE GREATLY INCREASED. A FULL ASSESSMENT FOR THIS AREA, AND ACTION, LONG OVERDUE.

Representation number: 9

From: Anthony Houlton

Organisation:

Submitted: 17 July 2026

Method of submission: Online

Comments:-

The A357 speed restrictions shown in the report are in my opinion inadequate. I agree with the 20mph limit in the Southern part of the village. However, the need for such a limit in the Northern half should be considered as the risks are fairly considerable in the North especially adjacent to the Church Centre and the Coop shop where the road is straight and downhill encouraging many cars to exceed the limit. Cars trying to gain access to the A357, and even more so for pedestrians being forced to cross the road due to the configuration of pavements and gaining access to the Coop shop are often subject to a high level of risk. Careful consideration for a 20mph limit should be given to this section of road.

Representation number: 10

From: Philip Reese, Senior Planning Policy Officer

Organisation: Dorset Council

Submitted: 24 July 2026

Comments:-

Introduction

Dorset Council welcomes progress of the Shillingstone Neighbourhood Plan Review and supports its vision and objectives. We have commented on earlier versions, including the Regulation 14 version in August 2025, and are pleased to see that these comments have helped inform the contents of the Regulation 15 submission version of the plan.

While Dorset Council as a unitary authority represents various interests and objectives, one of our main roles in this situation is as Local Planning Authority which is tasked with determining planning applications and in preparing an authority-wide Local Plan. While we recognise that the submitted plan has been written by members of the community, we have to consider the implementation of the policies, and the compatibility of the policies with the strategy forming in the emerging Dorset Council Local Plan. A key consideration is the implementation of the proposed planning policies, and whether they 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 modified plan ready for submission.

National context

The government published a new draft NPPF for consultation in December 2025. The consultation ran until 10 March 2026. Details can be found here: National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK

Paragraph 6 of Annex A of the draft NPPF states that neighbourhood plans that are submitted to the LPA on or before the date of publication of the new NPPF should be prepared in accordance with the December 2024 version of NPPF. Neighbourhood plans submitted after this date must comply with the new NPPF. No date has been set for the publication of the new NPPF. As the Shillingstone Neighbourhood Plan Review was submitted on 27 May 2026, it is our understanding that it should be in accordance with the December 2024 version of NPPF.

Local context

Shillingstone falls within the former district of North Dorset, now part of the Dorset unitary area. The North Dorset Local Plan Part 1 (2011 to 2031) was adopted in January 2016, replacing large parts of the 2003 North Dorset Local Plan. Some of the policies from the 2003 NDLP are still saved – these are listed in Appendix A of the 2016 NDLP. The Shillingstone neighbourhood plan review was undertaken with the understanding that it would need to be in general conformity with the strategic policies contained in the 2016 NDLP. However, this basic condition was replaced in March 2026 by a new basic condition that requires neighbourhood plans to not result in the amount of housing taking place in an area being less than if the neighbourhood plan had not been made. The NDLP therefore provides a useful context for many of the proposed changes, but it now plays a less prominent role in the examination process.

The 2016 NDLP places Shillingstone as one of the '18 larger villages' on the settlement hierarchy. This is the second tier on the hierarchy. Policy 2 (Core Spatial Strategy) states that these "have been identified as the focus for growth to meet the local needs outside of the four main towns". Policy 6 (Housing Distribution) states:

> In the countryside (including Stalbridge and the villages) the level of housing and affordable housing provision will be the cumulative number of new homes delivered to contribute towards meeting identified local and essential rural needs. At least 825 dwellings will be provided in the countryside (including Stalbridge and the villages) during the period 2011–2031.

Beyond placing Shillingstone as one of the '18 larger villages' with gives it its role in the spatial strategy, the NDLP contains nothing more specific to Shillingstone. Instead, many of the policies refer to neighbourhood plans having the ability to provide greater detail. For example:

NDLP 2016 policy	**Summary of neighbourhood plan reference in policy**
Policy 2	NPs can review/define settlement boundaries.
Policy 3	NPs will be required to consider actions to mitigate and adapt to climate change.
Policy 7	NPs can include detailed policies relating to sensitive infilling in settlement boundaries

Policy 11	NPs can enable rural communities to plan for the local economic development needs.
Policy 12	NPs can define town centres and primary shopping areas and frontages.
Policy 15	NPs can consider measure to assist in delivering green infrastructure benefits, including designating local green space.

Going forward, Dorset Council consulted on a Dorset Council Local Plan – Options consultation in autumn 2025. This consultation considered the possibility of allocating more sites in towns and larger villages in Dorset in order to meet the latest local housing need figure, calculated by the new standard method. The housing need figure that we consulted on was 3,246 homes a year, having increased by about 80% in December 2024. Three possible additional housing sites were considered at Shillingstone. For reference purposes, the map of Shillingstone used in the 2025 Local Plan Options consultation is reproduced in Appendix 1. At present, Dorset Council is still considering the responses received to the consultation, and no final decision has been made regarding sites.

Dorset Council is currently considering moving to the 'new' planning system (following the Town and Country Planning (Local Planning) (England) Regulations 2026).[1] A report is going to Dorset Council's Cabinet on 28 July 2026 on this matter.[2] If this course is taken, the indicative timetable suggests local plan adoption between Feb to Aug 2029.

[1] Press release issued 20/7/2026: https://www.dorsetcouncil.gov.uk/news/government-planning-changes-force-dorset-council-to-take-new-local-plan-route
[2] Item 10 on Agenda for Cabinet on Tuesday, 28th July, 2026, 6.30 pm - Dorset Council

Comments on the submitted plan

Section	Comments
Table 1: Local Green Spaces	Two new LGS sites identified. Aerial photography shows these sites to be laid out as public open space since at least 2009, so they should be considered well established.  **Aerial photography from 2009 shows LGS-AAP and LGS-BOR in a very similar layout to how they are today (note that the school immediately to their south had not been built then)** Following our comments at Reg 14, we welcome the addition of text describing the importance of sites LGS-BOR and LGS-AAP. However, the phrase "Formally designated as LGS in 2025" is incorrect. You could either say that the LGS was first *identified in 2025*, or say that the LGS was *designated in 2026* – assuming that is when the NPR is made.
Para 3.08, Page 11	Typos: "The subsequent approval by Dorset Council in February 2025 for ~~an~~ a further five dwellings, three of which sit on the land behind the Old Ox Inn, has now rendered the full realisation of the envisioned green corridor no longer feasible."
Policy 1: Local Green Spaces	Relevant national policy: NPPF paras 106–108;

	We note and support the proposed changes to this policy as they help make it more consistent with the national policy for Green Belt, as required by NPPF paragraph 108.
Policy 2: Our roads, lanes and tracks	Relevant national policy: NPPF Chapter 8 'Promoting healthy and safe communities', Chapter 9 'Promoting sustainable transport', Chapter 12 'Achieving well-designed places', paras 170–182 'Planning and flood risk'; We note that this policy has been considerably expanded to cover: • Parking standards (at least 1.8 cars per dwelling, etc.) • Loss of front garden areas • Design of parking provision • Encouragement of tree planting • Provision of pavements • Drainage systems • Pedestrian links • Other highways issues / solutions listed on Table 2
Policy 3: The character and design of new development	Relevant national policy: NPPF Chapter 12 'Achieving well-designed places'; We note this policy has been expanded to include support for higher environmental standards for new buildings The new policy allows for deviations from traditional vernacular where there is a significant improvement to the sustainability credentials of a building. We feel this is a reasonable compromise and as such we support this change. NDLP Policy 24 includes a paragraph which states: "In certain circumstances, a well-designed 'contemporary' or 'modern' scheme will be acceptable."
Policy 4: Important community facilities	Relevant national policy: NPPF para 88d, Chapter 8 'Promoting healthy and safe communities';

	We note that the list of Community Facilities on page 25 is almost the same as that in the 2017 version of the plan, but with the addition of the Co-op village shop, which we understand has opened since the original plan was made.
Page 28 (Locations for new development) and Appendix 3: Housing Needs and Supply Calculations	We note that the original NP was based on a need for about 40 new homes over the plan period (2016 to 2031). The evidence presented in Appendix 3 applies various uplifts based on more recent evidence and government policy to increase this to about 54 new homes. With regards to the revised figure, it should be noted that this is ultimately based on the spatial strategy set out in the North Dorset Local Plan (2016). That plan directed the vast majority of housing growth to the four main towns (Policy 6: Housing Distribution) as this was considered to be the most sustainable option. However, given the increased need for more homes, there is a possibility that this spatial approach will need to be amended, allowing for more growth at other settlements such as the larger villages. Until a new spatial strategy starts to emerge, the updated figure of 54 dwellings appears to be reasonable as it is based on the existing planning strategy. We note also that the supply of sites, as set out in Table 3, exceeds this target by a margin, which suggests that NPPF paragraph 14 could be engaged for applications outside of allocated sites and the settlement boundary.
Policy 5: Development within the settlement boundary	Relevant national policy: NPPF paras 82–84 'Rural housing', paras 88–89 'Supporting a prosperous rural economy', para 110; We note the addition of a second paragraph to this policy, which refers to development outside the settlement boundary being strictly controlled.
Table 3: Housing Delivery	We reviewed this table in July / August 2025 and provided updated housing land supply data based on our monitoring for the 2024/25 period. We are pleased to say these updates have been incorporated into the table. Our residential monitoring for the 2025/26 period is

	ongoing, but initial findings show that the following sites were completed before 1st April 2026: • 16 Wessex Avenue – 1 dwelling • Ham Farm – 1 dwelling We also note that Land at Old Ox Inn (5 dwellings) was under construction on 1st April 2026. In terms of new consents, the only one to come forward during the 2025/26 period was for a replacement dwelling at Anthorn (ref: P/FUL/2024/07332 and referred to in SNPR paragraph 5.24). If developed, this will result in no net change on the housing stock. We are therefore reasonably confident that overall, the total housing supply for Shillingstone (76 dwellings) hasn't changed since last year.
Policy 6: Housing types and sizes	Relevant national policy: NPPF Chapter 5 'Delivering a sufficient supply of homes'; Relevant local policy: NDLP Policy 7 'Delivering Homes', Policy 8 'Affordable Homes' We note that the policy has been amended to make it clearer that new open market housing should comprise mostly of 2 and 3 bedroom properties, and 4 bedroom properties should be the exception. This has become a common policy requirement in several other recent neighbourhood plans, and we understand that there is a desire to ensure that new builds meet the needs of local people. We also note an additional paragraph in the policy (and the supporting text) that talks about resisting the subdivision of larger sites where it is seen to be a method to avoid the requirement for affordable housing. We're grateful that the NPG have provided a possible example of this in the Consultation Statement (application for 5 dwellings on part of the Hine Town Lane site in 2015). As this pre-dates the 2016 NDLP, it's not clear what the requirement was at the time for providing on-site affordable housing, and therefore

	whether this was a genuine attempt to avoid the requirement. As a general principle, NPPF para 129 encourages the "efficient use of land". The paragraph highlights a number of factors for consideration that might pull in different directions. In summary, these include: • The need for housing and other forms of development; • Viability; • Availability and capacity of infrastructure and services; • Desirability of maintaining an area's character and setting; and • Securing well-designed, attractive and healthy places. While we accept the NPG's concerns regarding the artificial subdivision of sites, in practice it seems very difficult to prove. Instead, the factors summarised above should be used to consider whether a particular proposal makes efficient use of land.
Policy 7: Antell's Yard	This policy allocates Antell's Haulage Yard for housing. We note that the site remains in employment use and that this is a long-term aspiration which will depend on the relocation of the existing business. We note that this policy remains unchanged.
Policy 8: Land off Candy's Lane	This policy allocates 0.11ha of land for one new home. We note that this policy remains unchanged. Additional text has been added to say that an application for a replacement dwelling was submitted in December 2024 (ref P/FUL/2024/07332). This permission was granted 1 August 2025 and relates to 'Anthorn'. From the plans it appears that the footprint of the new dwelling is roughly the same as the footprint of the old dwelling, and therefore we would agree that this shouldn't create an additional constraint to this allocated site.
Policy 9: Land adj the Cobbles	We note that the policy has been deleted because, as we note above, the site is now complete. This seems reasonable.

Policy 10: Hine Town Lane North of the Old Ox	As noted in the supporting text, an outline application for this site for 10 dwellings was refused in 2017 and dismissed at appeal in Nov 2018. This was due to the access being taken from Hine Town Lane, contrary to the policy, and because of the harm this access would cause to the character of the area. We note that the policy requires vehicular access to be taken from Blandford Road or through an adjoining plot. As the site isn't adjacent to Blandford Road, the only real option is through an adjoining plot. The fact that a new application hasn't been submitted since the appeal was dismissed almost 8 years ago suggests that this hasn't been easy to achieve. However, as noted in the supporting text, the recent approval for 5 dwellings at the rear of the Old Ox Inn (ref P/FUL/2023/05579) would provide a new and obvious site access which will hopefully overcome this constraint.
Policy 11: Land at the Old Ox	We note that this policy has been amended significantly in response to the latest planning consent. We note that the purpose of the policy is to protect the remainder of the pub beer garden and car park so that the facility remains viable. The title of the policy is labelled "Completed" – which isn't strictly accurate since the scheme for 5 dwellings approved on 28 February 2025 hasn't been completed yet. The policy refers to land "to the rear and south side of the Old Ox (as shown on the Policies Map)". There is a large scale map directly above the policy which shows land shaded in 3 or 4 different colours. It would be useful if a key could be provided to the map to explain what the different colours mean. I'm assuming new Policy 11 only applies to the red area, but it is not clear.
Policy 12: Hine Town Land South of the Old Ox	We note that this allocated site is now complete and therefore it is appropriate to delete it.
Policy 13: Whitepit Farm buildings	We note the intention to retain this policy/allocation, but with the addition of an extra paragraph in order to protect / safeguard

	character of the area by minimising light pollution and restricting telegraph poles. We support this change. Please note that currently the site remains in the ownership of Dorset Council, but we are in the process of selling it.

Dorset Council's Modifications Statement

The following is intended to fulfil the requirement of The Neighbourhood Planning (General) Regulations 2012, 17(e)(ii) which requires "…a statement setting out the [sic] whether or not the authority consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the authority is of this opinion."

In coming to an opinion, we have considered the contents of each policy in the revised plan, along with the Modifications Statement prepared and submitted by the Parish Council, the qualifying body. We have also considered government guidance, in particular, the Planning Practice Guidance on 'updating a neighbourhood plan'.[3] In particular, paragraph 106 of the PPG summarises the three types of modification that can be made to a neighbourhood plan. These are:

- Minor (non-material)
- Material modifications which do not change the nature of the plan
- Material modifications which do change the nature of the plan

The following table provides an overview of the policies in the modified document, and summarises the key differences and the reason for the change:

Policy ref	Summary of changes
1 'Local green spaces'	Policy more nuanced. Instead of protecting LGS from 'development' it protects them from 'inappropriate development that would reduce their open character or otherwise harm their reason/s for designation'. Two new LGS sites identified. Aerial photography shows these sites to be laid out as public open space since at least 2009, so they should be considered well established.
2 'Our roads, lanes and tracks'	The first paragraph of this policy is unchanged, which sets the principle that development shouldn't detract from the rural character of lanes and tracks. All following paragraphs have been

[3] Available from: https://www.gov.uk/guidance/neighbourhood-planning--2#updating-neighbourhood-plan

	added since 2017. The additional paragraphs can be summarised as consideration of the following: • Parking design / layout • Protection of front and side areas of existing properties • Permeable surfaces and drainage • Tree planting along highways • Provision of pavements • Drainage around Hines Town Land and Marsh Bridge • Pedestrian links • Potential solutions to highways issues listed in Table 2 The policy has therefore been significantly expanded. As well as providing more detail, the new policy covers topics that would not have been obvious from the old policy, such as parking and drainage.
3 'The character and design of new development'	The first four paragraphs are almost the same, with some tweaks to the wording. For example, the first paragraph now includes reference to the "the significance and setting of the area's heritage assets". The fifth paragraph has been added, and essentially gives conditional support to schemes that take "a different approach to the traditional vernacular" where they "achieve higher environmental standards". The conditions are that such development should "still reflect the character of the area" and "be broadly in keeping with its immediate context".
4 'Important community facilities'	The policies are very similar. The new policy includes the addition of "that there is clear, independently verified evidence that partial loss will not compromise the viability of the remainder of the facility". This provides a little more flexibility in the protection of community facilities.
5 'Development within the settlement boundary'	The first paragraph is the same. The second paragraph of the new policy has been added. It states that outside the settlement will be treated as 'countryside'. This is essentially restating the position in the NDLP.

6 'Housing types and sizes'	The first couple of lines are roughly the same. The original policy then stated that larger (4+ bedroom properties) are only like to be acceptable on suitable plots. This has been changed to state that "predominantly 2 and some 3 bedroom properties" are expected and 4+ bedroom properties require evidence of local need. A new paragraph has been added to resist the artificial subdivision of sites where this is to avoid providing on-site affordable housing. The third paragraph, regarding self-build homes, is the same.
7 'Antell's Haulage Yard'	Policy and site allocation unchanged.
8 'Land off Candy's Lane'	Policy and site allocation unchanged.
9 'Land adjoining the Cobbles'	Policy deleted as site development complete.
10 'Hine Town Lane North of the Old Ox'	Site allocation the same. The new policy adds the following requirements: • Smaller dwellings • Low rise dwellings • Consider planting native shrubs and trees • Green space through the development • Protect privacy of neighbouring properties • Avoid traditional street lighting and telegraph poles
11 'Land at the Old Ox'	Policy essentially rewritten. The old policy proposed holiday accommodation tied to the pub, plus 3 additional homes. The new policy retains land around the Old Ox for open space / pub garden and car park.
12 'Hine Town Lane South of the Old Ox	Policy deleted as site development complete.

13 'Whitepit Farm buildings'	Site allocation boundary amended slightly (following representations from Dorset Council as the landowner). First, third and fourth paragraphs are the same. Small additions to the second paragraph ("adaptive", "heritage" and "to ensure their long-term viability"). Fifth paragraph is new. It encourages against traditional street lighting to minimise light pollution. It also suggests that telegraph poles are avoided to reduce visual clutter. Final paragraph is the same.

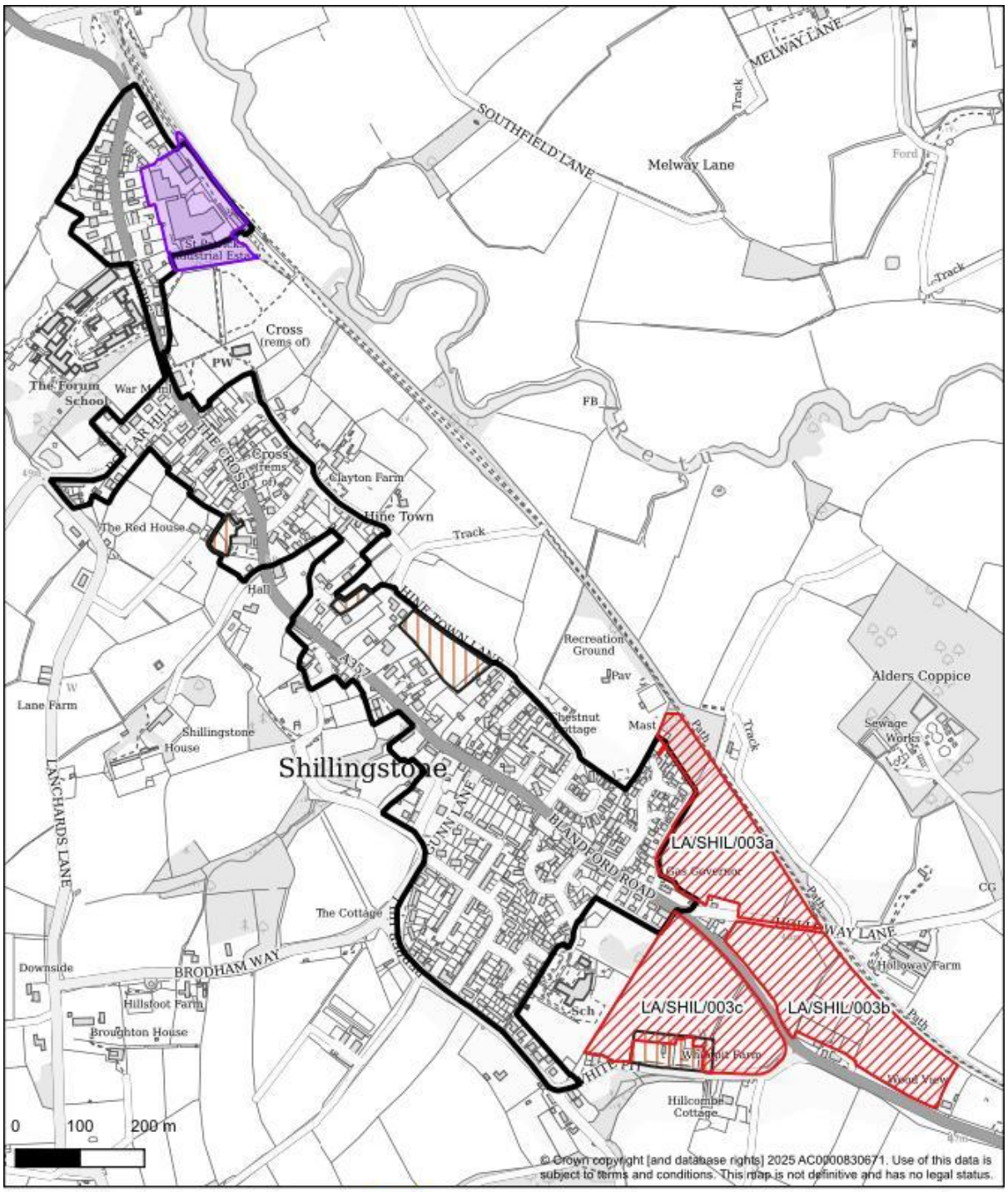
With regards to the proposed changes, we note that the plan period remains the same, and that the plan does not identify any new development allocations. Some site allocation policies have been deleted as their envisaged development is complete. One site allocation has had a minor alteration to the allocation boundary (Whitepit Farm Buildings) in order to align with the physical site boundary.

While the plan does not have vision or objectives there is a section called "The focus of this plan – what it aims to achieve" (page 2). Paragraph 1.08 provides a list of what might be considered objectives that the plan focuses on. These are largely the same, however the new plan contains an additional item regarding protecting and enhancing Shillingstone's historic environment.

The new plan identifies two new Local Green Spaces, and it makes a number of changes to various other policies (as discussed above). Some of the policies have changed quite significantly, such as Policy 2. There have been a lot of changes made to the supporting text, but these are considered minor in nature and largely provide factual updates and other improvements.

While there have been a large number of changes, Dorset Council's view is that none of the proposed modifications are so significant or substantial as to change the nature of the Plan.

Appendix 1 – Dorset Council Local Plan Options Consultation 2025 – Map of Shillingstone



Consultation sites

Residential option - proposed

Employment allocation - existing

Residential allocation - existing NP

Existing allocations & consents

Settlement boundary - existing