

Shaftesbury Neighbourhood Plan – First Review

Responses to the Regulation 16 consultation

4 February 2026

Submission of the modified plan under Regulation 15 was completed on 24 November 2025. The Regulation 16 consultation was held between 12 December 2025 and 30 January 2026 (7 weeks). Ten responses were received, as detailed in the table of contents below.

Table of contents

No.	Organisation / Name	Date received
Representation number: 1	National Highways / G Gallacher	12 Dec 2025
Representation number: 2	Natural England / R Tuck	3 Feb 2026*
Representation number: 3	Historic England / D Stuart	28 Jan 2026
Representation number: 4	Environment Agency / O Ashade	16 Jan 2026
Representation number: 5	NHS Property Services / J Beackon	29 Jan 2026
Representation number: 6	Gillingham Town Council / J Hawkins	27 Jan 2026
Representation number: 7	Philip Proctor	12 Dec 2025
Representation number: 8	Nightingale Lane / J Fleming	30 Jan 2026
Representation number: 9	Cranborne Chase National Landscape / R Burden	4 Feb 2026*
Representation number: 10	Dorset Council / P Reese	30 Jan 2026†

* Arrived after the consultation deadline

† Available as a separate document

Representation number: 1

From: Gaynor Gallacher, Assistant Spatial Planner

Organisation: National Highways

Submitted: 12 December 2025

Method of submission: Email

Comments:-

Thank you for providing National Highways with the opportunity to comment on the submission version of the Shaftesbury Neighbourhood Plan First Review document. As you are aware, National Highways is a statutory consultee in the planning process and is the strategic highway authority responsible for operating, maintaining and improving the strategic road network (SRN). In Dorset this comprises the A303 (which passes about 12km to the north of the plan area) and the A35/A31 corridor some distance to the south.

In general terms we consider that the plan's proposed policies are unlikely to result in a scale of development which will adversely impact the SRN, although we note policies SFHE1a-d which allocate sites for housing development, sufficient to provide for a predicted 600 dwellings over the plan period to 2031 in combination with already consented sites. Also noted is policy SFHE4 which protects a corridor to the east of the town for a potential bypass.

However, given the relative proximity of the plan area to the A303 and associated at-grade junctions, any large scale development that may come forward in the plan area would need to be supported by an appropriate assessment of traffic impacts which should consider the operation of the SRN in line with national planning practice guidance and DfT Circular 01/2022 *The strategic road network and the delivery of sustainable development*. Where proposals would result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy. We are therefore also continuing to work with Dorset Council in the preparation of their transport evidence base for the emerging Local Plan.

Please note that these comments do not prejudice any 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 February 2026

Method of submission: Email

Comments:-

Thank you for consulting Natural England on the Shaftesbury Neighbourhood Plan. I apologise for the delay in response.

Please find our response attached.

ATTACHED FILE FOLLOWS OVER THE NEXT 5 PAGES

Date: 03 February 2026
Our ref: 536208



philip.reese@dorsetcouncil.co.uk

BY EMAIL ONLY

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

T [REDACTED]

Dear Mr Reese,

Shaftesbury Neighbourhood Plan 2019-2031 Regulation 16 Consultation

Thank you for your consultation on the above dated 12 December 2025

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.

Cranborne Chase & West Wiltshire Downs National Landscape

POLICY SFHE1a - Land south-east of Wincombe Lane (Hopkins Land) allocation on the eastern side of the town lies in potentially sensitive localities within the setting of the Cranborne Chase & West Wiltshire Down National Landscape. NPPF paragraph 189 requires that development within the setting of a National Landscape should ensure they are "sensitively located and designed to avoid or minimise adverse impacts on the designated areas". Natural England therefore advises that the Cranborne Chase National Landscape Team are consulted over the likely implication of the individual allocations.

The proposed allocation along the eastern boundary should require significant improvements of the landscape. It should be considered together with a masterplan, which demonstrates how the scheme could significantly improve the current urban edge of the town including necessary landscaping measures and green infrastructure on adjacent land within Wiltshire.

Opportunities:

- With important wildlife sites present in the plan area, Natural England supports the inclusion of specific policy wording to require the creation of green infrastructure (GI).
- Examples of GI enhancements include the creation and preservation of habitat linkages between existing wildlife sites, the retention of hedgerows, SuDS, trees and ponds; the requirements for the creation of ecological enhancements such as the inclusion of bat and bird boxes, ponds and the use of native planting for new developments.
- GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

River Avon Special Area of Conservation (SAC) Catchment

We note that the majority of sites in Shaftesbury are in the River Avon SAC Nutrient Neutrality Catchment and will therefore be required to demonstrate phosphorus neutrality. This should be noted in the Habitat Regulations Assessment and applies to any other sites in Shaftesbury that in the River Avon SAC Nutrient Neutrality Catchment. Where the Waste Water Treatment Works serves a development outside of the catchment we have no concerns.

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

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

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

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

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

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](#)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, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

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/>

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.

Site allocations should be supported by a baseline assessment of biodiversity value.

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>

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: 28 January 2026

Method of submission: Email

Comments:-

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

In our response to the Regulation 14 consultation on the pre-submission version of the Plan we focused on its intention to allocate sites for development and the need for appropriate evidence to demonstrate that these could be delivered without causing harm to the historic environment and without the need for a full SEA.

We note from the submitted Plan and its accompanying documents that the Consultation Statement (undated) refers to our response and comments that your authority's conservation team raised no concerns over the proposed site allocations.

We also note the updated (May 2025) SEA Screening Report which elaborates on the consideration of the sites in question with additional heritage information and your authority's determination that a full SEA is not required.

Our Regulation 14 response concluded by stating that we would be happy to defer to your authority's conservation team in the matter of the acceptability of the proposed development sites from a heritage perspective.

On that basis, taking the above observations into account, and on the assumption that your authority's conservation team has stated that it has no concerns over the proposed site allocations, I can reaffirm our preparedness to defer to your authority on the matters we have raised previously.

There are therefore no outstanding or residual matters associated with the Plan upon which we wish to comment.

Representation number: 4

From: Ololade Ashade, Planning Advisor

Organisation: Environment Agency

Submitted: 16 January 2026

Method of submission: Email

Comments:-

Thank you for consulting the Environment Agency on the scoping report for the Shaftesbury Neighbourhood Plan.

Environment Agency Position

We do not consider there to be potential significant environmental effects associated with the plan, based on a review of environmental constraints for which we are a statutory consultee.

Please note that the Lead Local Flood Authority (Dorset Council LLFA) can advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan is the evidence base for this and contains recommendations and actions to reduce the risk of flooding. This may be useful when gathering baseline data and drafting key sustainability issues and objectives on which to appraise the neighbourhood plan.

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-and-guidance/consider-environmentneighbourhood-plans/>

Representation number: 5

From: James Beackon, Town Planning Intern

Organisation: NHS Property Services Ltd

Submitted: 29 January 2026

Method of submission: Email

Comments:-

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to

continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Neighbourhood Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Neighbourhood Plan in a way that supports sustainable growth.

Draft Policy SFHE2

Policy SFHE2 outlines the principles applied to future proposals small to medium housing sites and how they address local needs. NHSPS supports the approach including key workers within the delivery of affordable housing.

The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services.

Conclusion

NHSPS thank Shaftesbury Town Council and Dorset Council for the opportunity to comment on the Shaftesbury Neighbourhood Plan. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

Representation number: 6

From: Julie Hawkins, Town Clerk

Organisation: Gillingham Town Council

Submitted: 27 January 2026

Method of submission: Online portal

Comments:-

Gillingham Town Council considers the document to be well laid out and clear to understand. The structure, layout and inclusion of high-quality photographs make the document enjoyable to read and easy to navigate.

Gillingham Town Council would like to congratulate the authors on producing a thoroughly researched and thoughtfully prepared document. The research, careful consideration of policy wording, and responsiveness to consultation feedback are evident throughout.

Gillingham Town Council supports Shaftesbury Town Council's modified Neighbourhood Plan.

Representation number: 7

From: Philip Proctor

Submitted: 12 December 2025

Method of submission: Email

Comments:-

Thank you for sending the email about the NP revisions.

Former ATS site:

As owner of the land known as the "Former ATS Site" I can confirm that it will stay as a car park. For information, on my death it will pass to the Shaftesbury Charitable Trust to be held "forever" as a car park and its income used for charitable purposes. So unless cars disappear forever, it will not be developed for housing. The town has already noticed a doubling in the footfall in the High Street which is very rewarding for the vitality of the town.

Employment Land:

Having watched the Secretary of State require employment land to be included as part of the Eastern Development it was unbelievable that the SoS allowed residential development on the employment land at appeal, in spite of a huge list of businesses enquiring for land to develop employment businesses. Woolley and Wallis who were appointed by Persimmon would never respond to enquiries as I tried on several occasions to buy employment land. Up and down the A350 corridor employment land has been developed and Shaftesbury and all the new houses needs employment land.

There is a lot of noise around the Blackmore Vale Creamery, and any housing developed nearer it will cause problems, however employment buildings designed to form a "Byker Wall" (maybe not on the same scale...) could act as a sound barrier.

The land proposed in the local plan either side of the Gillingham / Long Cross link is totally unsuitable for employment. DC purchased it for a road, therefore by law they cannot develop for other purposes (It is a well know test case). Further in the foreground below Castle Hill it would be unsuitable, and additionally it is largely running greensand.

By Pass:

With the likely imposition of the Bus Gate, Christy's Lane which already clogs up will be even more of a barrier.

The expansion of the town can only practically extend to the east, however the access roads - Wincombe Lane and Mampitts Lane are totally inadequate for further housing loads. Wincombe Lane is narrow, passes the primary school then either access is via The Venn meandering to Grosvenor Road, or through Longmead and the congested factory estate. Mampitts Lane is closed most likely by the ridiculous Bus Gate, putting access down Allen Road. Allen Road may have design capacity but the shortage of parking spaces means that it is lined with cars on both sides for most of its length (probably not when officers visit) which means that it is already congested.

Therefore any new housing should be served by a new distributor road linking the A350 at the Wincombe end and the A30 at the southern end. If you look at Billingshurst a similar situation existed and the housing developers happily built the ring road which has given them clean access to their properties and the town a by pass. If developers provide this road then it would be instead or logged as CIL and developers should see this as a mutual benefit.

What the developers will need is the support of Dorset Council to assist in securing land and agreeing simplicity of what is required - ie that this road does not generally need foot or cycle ways as cycles and pedestrians can use the radial routes.

Marks and Spencer are looking for a site for a new store and half way along a by pass would be an ideal location as the northern part of Shaftesbury is not served by any retail or cafe/pub/leisure facilities.

I believe there is a strong case to be made for the by-pass following alongside the line of the trunk water main. It would mean that the road would better serve the next pahse of housing and be in the right place for subsequent developments for the next 50 years. We should plan ahead. It is lack of a longer term plan that has meant that estate roads are inadequate for additional development.

Barton Hill House:

The house and its gardens should be listed as a group together with the listed ice house to ensure space for the important garden is retained.

There is potential to make the gardens into a public park. The house has had modern boarding house extensions which may or may not be retained. Either way the house is regency and and could be restored as a fine example which Shaftesbury is short of.

Running Greensand:

It is good that the message about running greensand has worked into the plan. The engineers responsible for the A30 flyover will confirm that even with boreholes striking rock, when they came to put in the piles, they disappeared... as the boreholes had merely hit boulders. It takes some local knowledge and experience to recognise the lumpy land which shows above running sand, and there is a good reason why it has not been developed.

Recreation land:

A few years ago I submitted an application for a small number of houses to fund an 18-acre recreation park to make up for the 18 acres that Persimmon managed not to provide under the 6-acre rule at the Eastern Development. The town lacks a proper recreation ground with football pitches and cricket pitches of assorted sizes, tennis courts and so on served by a clubhouse building. Rather than spotting small pocket handkerchief spaces there is the potential to pool these to make a larger park. The Wiltshire land adjoining Langdale Farm is ideal for this purpose but it needs some co-ordination from Dorset Planning.

Representation number: 8

From: John Fleming, Development Manager

Organisation: Nightingale Lane

Submitted: 30 January 2026

Method of submission: Email & Online portal

Comments:-

Please find attached the response of Nightingale Land to the above consultation.

The representations have been submitted via the online portal. However, the questionnaire notably excludes reference to the examination process. It is considered that modifications made to the plan are material (i.e. changes to the wording of the settlement boundary policy and allocation of sites) and as such should be referred to an independent examiner for examination. If the examiner considers it necessary to hold a public examination then we request we are afforded the opportunity to participate in the proceedings.

ATTACHED FILE FOLLOWS OVER THE NEXT 6 PAGES.

30th January 2026

Dear Sir or Madam,

Re: Shaftesbury Neighbourhood Plan – Regulation 16 consultation

This letter provides the response of Nightingale Land (NL) to the current consultation held by Dorset Council (DC) on the submission version of the Shaftesbury Neighbourhood Plan (SNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

NL has land interests in the Neighbourhood Area at land off Wincombe Lane. The site is presently identified as one of DC's opportunity sites within the emerging Local Plan (site ref: LA/SHAF/004) for around 43 homes. A site location plan is included at Appendix 1 of this submission. NL are currently considering the development potential of the land and would be keen to discuss the site with the Town Council and invite them to contact us in this regard. Whilst only part of the site falls within the designated neighbourhood area, the wider land is intrinsically related to Shaftesbury, and its delivery can provide additional local community benefits.

The SNP will need to ensure compliance with the Neighbourhood Plan Basic Conditions. These are outlined as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- d) The making of the order contributes to the achievement of sustainable development.
- e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

Consistency with emerging Local Plan

Whilst the SNP will be tested against the adopted Development Plan, the PPG is clear that regard should be given to the approach taken in the emerging local plan and the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is brought forward before an up-to-date local plan in place the qualifying body and local planning authority should discuss and aim to agree the relationship between the emerging local plan and neighbourhood plan¹.

It does not appear that the SNP has regard to the direction of travel within the emerging Local Plan and as a result it will likely to be superseded shortly after the making of the plan due to section 38(5) of the Planning and Compulsory Purchase Act 2004, which requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

Within the emerging Local Plan Shaftesbury is identified as a tier 2 settlement within Northern Dorset and will likely need to accommodate housing to meet local needs.

The modification statement sets out the context for the increases to housing needs across the plan area. The SNP First Review covers the period 2019-2031. The PPG is clear that neighbourhood plans provide opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local needs². It is accepted that this is a review of the existing plan, however, it will only provide at best up to 5 years post adoption which does not set out a positive vision for the area over an appropriate time frame particularly in the context of increased local housing needs. Indeed, the Housing Target Paper dated 4th April 2023 available on the Town Council's website recognises that the proposed Local Plan housing need figure will be revised to take account the more recent methodology for calculating local housing need which has since occurred.

It is assumed that the adjusted targeted is based on the previous Local Plan target as opposed to the current local housing need figure identified by the existing standard method calculation which equates to a housing need of 55,182 dwellings

¹ PPG Reference ID: 41-009-20190509

² PPG Reference ID: 41-003-20190509

across Dorset over the period 2026 – 2043. The plan period should be extended to align itself with the emerging Local Plan and a request to DC should be made to identify a proportionate interim figure to plan for to ensure a positive vision for the area is delivered.

At the time of publication, that report suggests no current plans to identify additional housing sites at Shaftesbury. However, this pre-dated the Regulation 18 consultation undertaken in 2025 which has since confirmed the DC's intention to allocate further land for housing but a specific housing requirement is yet to be confirmed. The SNP makes no reference to those sites identified in the emerging Local Plan. It is therefore unclear in the context of the emerging Local Plan what level of development Shaftesbury will be required to accommodate and flexibility in the plan is therefore required.

Policy SFHE1

Although the scope of the settlement boundary has not altered, the emphasis of the policy has materially changed from the current wording in the existing made neighbourhood plan.

Policy SFHE1 in the made SNP allows development beyond the settlement boundary where there is a clear assessment of the social, economic and environmental impacts. However, the proposed wording put forward seeks to actively 'resist' development outside settlement boundary. This is negatively worded and does not support the delivery of sustainable development and therefore conflicts with basic conditions (a) and (d). Notably, DC are currently unable to demonstrate a housing land supply and through the emerging Local Plan are taking the approach to implement a 'flexible settlements policy'. It is therefore unclear what regard has been given to the strategic approach going forward in the emerging Local Plan to ensure consistency and avoid the Plan being ultimately superseded in quick succession. In addition, it does not have regard to the approach currently being consulted by Government (Draft 2025 NPPF) which now seeks to allow development on the edge of sustainable settlements where an unmet need is identified.

What the plan seeks to achieve is to include 'allocations' within the existing settlement boundary. These sites are already largely acceptable in principle given their location. The reasons that that approach has been adopted is presumably to afford some level of protection to the neighbourhood plan area as set out in paragraph 14B of the National Planning Policy Framework (2024). However, it is unclear whether sites are available for development i.e. land south-east of Wincombe Lane has no information from the owner as to whether the site is

available for development, the ATS Euromaster site is subject to an application for use as a car park, the Police Station and Post Office sites are not being actively promoted but can come forward subject to current uses being relocated.

The PPG is clear that neighbourhood plans should not re-allocate sites that are already allocated through strategic plans³ and should be supported by appropriate evidence. Consequently, there is no substantive evidence that these sites are available for development and should therefore not be considered to benefit from an allocated status.

Policy SFGI2

Policy SFGI2 also seeks to resist development that does not preserve the remaining open or wooded area and their distinct rural character. This again is negatively worded and should be amended. Notwithstanding this, there is a clear understanding in SFGI2 that development on the edge of town is capable of coming forward so long as it respects the environmental context and provides a soft edge to the town. As such, there is an internal consistency between the approach taken in policies SFHE1 and SFGI2 and how a decision maker can apply these consistently and with ease.

Site submission

NL are currently promoting land at Wincombe Lane. The site is identified as one of the opportunity sites within the emerging Local Plan (site ref: LA/SHAF/004) for around 43 homes. Whilst it is appreciated that the neighbourhood plan defines the bypass route the Council's assessment of the site confirms that there are no known funding arrangements available to implement this and has therefore considered it as a draft allocation along with several other sites in the neighbourhood area.

The site is well related to the existing built form of the settlement and provides a natural extension to the neighbouring site currently being built out by Barratt. The site can be sensitively designed to respond positively to the wider character of the area and Nightingale Land are keen to discuss the development opportunity and invite the Town Council to contact us in this regard.

Conclusion

Nightingale Land hope you have found this letter to be constructive. Should the Examiner consider it necessary to discuss the matters raised at a hearing then we

³ PPG Reference ID: 41-044-20190508

respectfully request that we are afforded the opportunity to participate at the Examination.

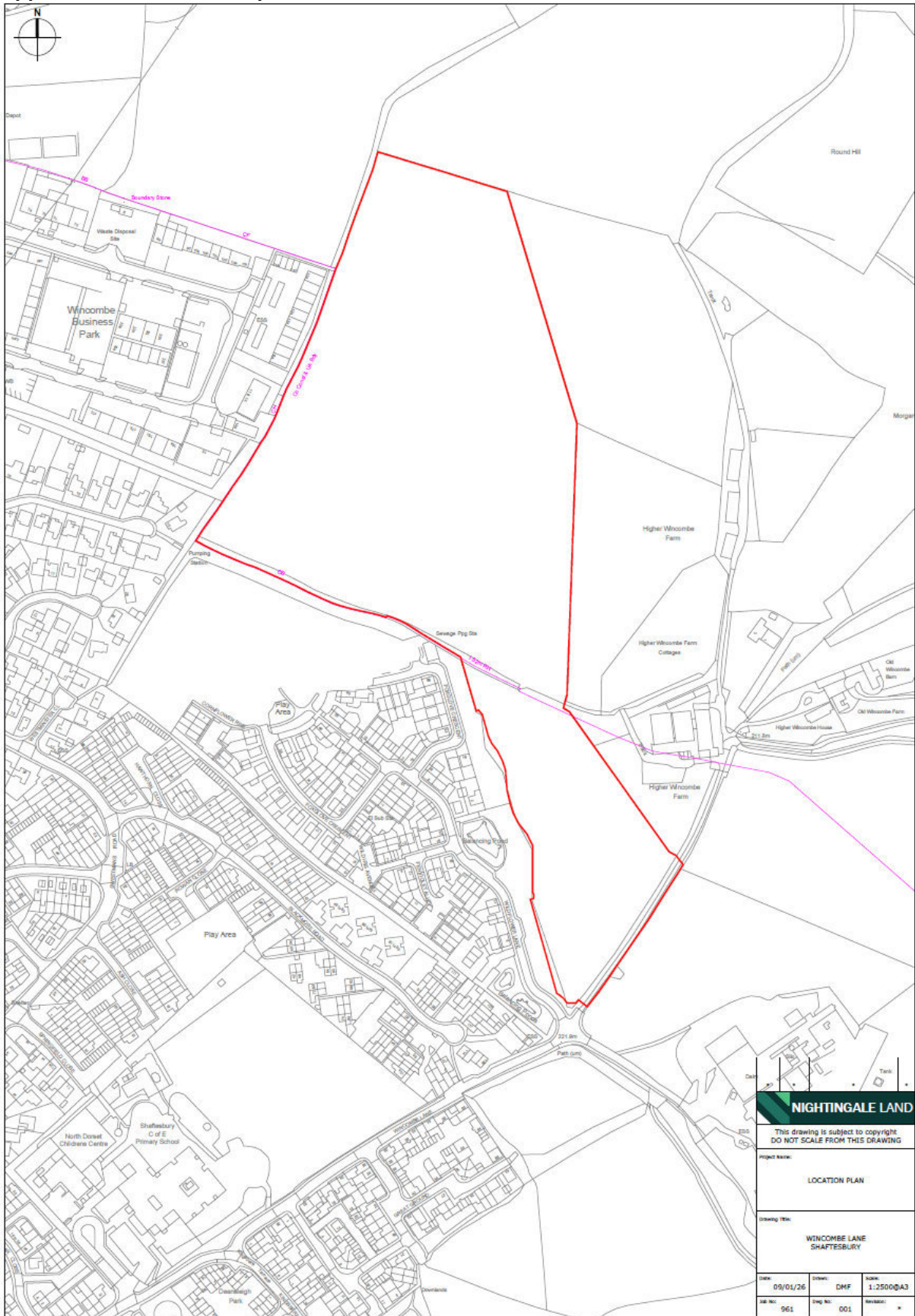
Yours faithfully,
John Fleming
Development Manager
Nightingale Land

Email: [REDACTED]

Tel: [REDACTED]

www.nightingaleland.co.uk

Appendix 1: Site location plan



Representation number: 9

From: Richard Burden, Principal Landscape & Planning Officer

Organisation: Cranborne Chase National Landscape

Submitted: 4 February 2026

Comments:-

Thank you for the opportunity to comment on the review of the Shaftesbury Neighbourhood Plan.

It is a particularly attractive document and clearly a lot of effort has gone into the Review. I have noted that there are a few typographic corrections which will, presumably, be picked up at the proof-reading stage. Eg. photo captions on p106, punctuation in the first sentence on p106, NL for AONB p103.

Although this NL is shown on plans, there doesn't seem to be a statement that as an edge of CCNL town, in a prominent position, and at the intersection of A class roads, Shaftesbury has a key role as a service centre for this NL [including areas of Wiltshire].

On p38 I would suggest that the western sector of the Redrow site is visually sensitive, and the landscape proposals agreed at the outline planning stage recognised that.

Regarding Policy SFHE1a which allocates land for housing south-east of Wincombe Lane, the site is to the west of the BV Dairy site and impacts on this NL could be limited by restricting the height of buildings, the character and density of landscape planting, the provision of open space on the eastern side, and the control of light pollution / provision of IDSR compliant lighting.

CCNL is concerned by section 3.5, the Eastern Bypass reserved route, and policy SFHE4. Whilst the wish to remove north – south traffic from the town is appreciated, the route is being reserved without consideration of the likely impacts on this nationally important, and nationally designated, national landscape. The route shown is but a short section, in isolation from any coherent links north or south, and those links would impact on this NL. Those impacts would include not only the physical structure of the road and associated cuttings, embankments, and drainage but also the introduction of substantial quantities of traffic into this NL disrupting its tranquillity, a key characteristic of the NL. There does not appear to be policy support for the proposed NP policy in higher level planning and transportation strategies.

CCNL welcomes the chapter and policies on Green Infrastructure, with the recognition of links to this NL and views in many directions. I would suggest that views of Shaftesbury from its approach roads are ones experienced by many people and the view of Shaftesbury from the B3081 between Shaftesbury and Gillingham could be included.

On p60 it is not clear what the Policy, SFGI 4, sets out to do. We raise this because we have seen recently the report of a NP Examiner who appears not to have understood the obligation to reduce light pollution year on year rather than merely minimising the increase in light pollution in the setting of an IDSR. It may also enhance understanding of the importance of the topic if the fact that CCNL's IDSR is the 14th in the world. CCNL recommends that an explanation to that effect is included. That could include *The National Landscape Management Plan requires an annual reduction of light pollution, **not** merely a minimisation of increase.*

It may also enhance reading and understanding of the intention of the section on dark skies and lighting if the two issues, reduction of light pollution and the provision of good, dark skies compliant, lighting are separately set out. As currently worded, Policy SFGI 4 appears to relate only to new development. It should be clarified that reducing light pollution applies across the NP area, and all five policy criteria should be applied to all lighting, existing and new, including sports lighting. Appendix 7.5 GI4, Town Council Lighting and CCNL, appears to recognise the conversion of existing lighting to become dark skies compliant.

In appendix 7.8 p112, AONB should be changed to NL, and minimised changed to reduced.

Appendix 7.8 in a helpful views audit. CCNL welcomes this, having found that such audits elsewhere have served as useful evidence as to which views are valued and important. Unfortunately, recent development, such as south of the A30, has interfered with iconic views of this NL from Shaftesbury. That indicates that greater protection should be given to remaining views, especially as a key characteristic of Shaftesbury is the views.

The projects appendix includes a project, GI 4, to reduce light pollution within the NP area, and CCNL would be happy to assist with that. In a similar vein, CCNL would be happy to encourage and facilitate aspects of the Green Infrastructure projects list that tie in with our Nature Recovery Plan.

I hope those comments are helpful to you.