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Gillian Clark

From: MSA Parish Clerk <[REDACTED]>
Sent: 18 January 2014 16:51
To: PlanningPolicy
Cc: michael.hopper@btinternet.com
Subject: Response to Local Plan Pre-Submission Document
Attachments: Response to Local plan.pdf; Response to LP Policy 3.pdf

Please find attached a combined Parish Council and TAINT response to the Local Plan pre-submission document. Only those policies where time and knowledge allowed have been commented upon.

Regards

Colin Hampton
Clerk
Milborne St Andrew Parish Council

North Dorset Local Plan – 2011 to 2026 – Part 1

1 - Introduction

1.14 - 1.22 *Neighbourhood Planning in North Dorset. Milborne St Andrew is currently exploring the viability of providing a Neighbourhood Plan for this parish. The area has been agreed as the whole parish boundary.*

Neighbourhood Development Orders – it is unclear at this part of the document what the impacts of these orders are.

1.30 *Common interest with other authorities must include and seen to include the Parish Councils many of whom believe that their views are not taken into consideration for planning.*

2 – North Dorset Context

2.49 *add do not harm the/or industrialise the environment and countryside.*

2.52 *Objective 4. The wording is appears to be weak and could stronger by dropping the word 'general' before policy. The removal would make it less ambiguous; as written could open the countryside to much larger scale development proposals. The word general can be a little misleading and imply a willingness to accept these larger proposals in the absence of a Neighbourhood Plan.*

2.54 *There is a mismatch of aims, public transport is under considerable strain with the removal of services, the aims of the district and county council to impose higher car parking charges within the Market Towns, making it increasingly difficult to see that this Objective 6 is fair for the rural community.*

3 – Sustainable Development Strategy

Policy 1 – Presumption in Favour of Sustainable Development

Policy 2 – Core Spatial Strategy

3.37 *recognises additional problems of concern in this area*

3.47 *Starts discussion on using neighbourhood plans to meet local needs in the Countryside.*

3.53 - 3.54 *Discusses meeting the local needs in the Countryside by 'Opting in' to the Local Plan Part 2, unfortunately this document is not available to comment on.*

Settlement boundaries

3.55 – Relates to Towns

3.56 Settlement boundaries to be removed around all other settlements including Milborne St Andrew. Further development will be subject to countryside policies but the local community could decide to have a settlement boundary, which would still allow infill development either in a neighbourhood plan or opted in to the North Dorset Local Plan Part 2 .

This section because Part 2 is unable to be viewed is currently too weak to comment on. However the full meaning of countryside policies as a means of furthering development in the villages needs to be fully understood by those communities before signing up to them. See page 39.

4 – Environment and Climate Change

Policy 3 – Climate Change

Environment and Climate Change

4.1 The impact of industrial wind farms and possible large scale solar farms will not meet this object of enhancing the local environment and making it more attractive.

I have asked Taint to look at this.

4.27 – 4.31 Flood Risk

There are a lot of fine words but too little direct action in tackling these issues which have clearly been made worse by previous planning and development decisions. Active policies to reduce risk should be placed on developers and NDDC, DCC and EA.

Policy 4 - The Natural Environment

4.36 – 4.112

Policy 5 - The Historic Environment

4.113 – 4.176

5 - Meeting Housing Needs

Policy 6 – Housing Distribution

5.4 - 5.6 - National Policy

The Districts Council's Approach

5.7 – 5.8 sets out councils aims to develop the main focus on the four main towns in the district.

5.9 In the countryside it is expected that housing need will be met via Neighbourhood Planning and where it is demonstrated there is local housing needs. There is a rural exception sites set out in Policy 9.

Concern here is that if there is no Neighbourhood Plan then we are in a situation where exception and housing can be imposed on us

5.10 Deals with the housing needs of the four main towns but implies countryside may take up the slack.

5.11 Talks about the scale of housing and affordable housing in the countryside that will be determined by cumulative local and essential rural needs.

From the laymen's point of view there needs to be a focus on developing the built environment and infrastructure in tandem with any further housing in the villages.

District – Wide Housing Provision

5.12 – 5.14 up to 280 new dwellings or 4200 over the fifteen years 2011 – 2026 this is the proposed requirement for the whole of the district.

District – Wide Affordable Housing Provision

5.15 387 additional units over 5 years

5.16 Of the new housing stock 40% is the preferred target, with 30% on sites in Gillingham.

5.17 The ratio of 40% would deliver 1480 additional affordable homes in the 4 main towns.

It is unclear at this point in the document

- 1. Are the affordable homes in addition to or part of the 4200?*
- 2. All homes are affordable if you have the money; there is no definition of affordable in this part of the document. How is this criteria defined?*

5.20 It is proposed that a minimum of 6% of housing (230) is built in the villages during the life of the plan.

This setting of a minimum level could be easily broken without a firm Neighbourhood Plan in place.

5.26 - 5.27 *Sets out this approach and needs careful consideration.*

The Spatial Distribution of Affordable Housing

5.28 – 5.29 In line with housing distribution elsewhere in document.

Policy 7 – Delivering Homes

Policy 8 – Affordable Housing

Policy 9 – Rural Exception Affordable Housing

Policy 10 – Gypsies, Travellers and Travelling Show people

6 Supporting Economic Development

Policy 11 – The Economy

Policy 12 – Retail, Leisure and Other Commercial Developments

7 Infrastructure

Policy 13 – Grey Infrastructure

Policy 14 – Social Infrastructure

Policy 15 – Green Infrastructure

8 Market Towns and the Countryside

Policy 16 – Blandford

Policy 17 – Gillingham

Policy 18 – Shaftesbury

Policy 19 – Sturminster Newton

Policy 20 – The Countryside

9 Gillingham Southern Extension

Policy 21 – Gillingham Strategic Site Allocation

10 Development Management Policies

Policy 22 – Renewable and Low Carbon Energy

I have asked Taint to look at this policy and comment.

Policy 23 – Parking

This policy is flawed in that whilst using guidance developed by DCC it does not mirror life and how people live. The standard draws on assumptions that people are robotic and will park as in a theoretical modelled manner.

Local car ownership in the countryside is far different from the urban situation where public transport is better provided. Recent reductions in bus service subsidies reflect a change of service provision that is available to the rural population . This reduced service will lead to increased car use and ownership and this should be reflect in the parking standard for Dorset. Has a separate study been carried out on the Countryside to see if there is a true relationship between urban and countryside dwellings?

Policy 24 – Design

Policy 25 – Amenity

Policy 26 - Gypsies, Travellers and Travelling Show people

Policy 27 – Retention of Community Facilities

Policy 28 – Existing Dwellings in the Countryside

Policy 29 – The Re-use of Existing Buildings in the Countryside

Policy 30 – Existing Employment Sites in the Countryside

Policy 31 – Tourist Accommodation in the Countryside

Policy 32 – Equine- Related Developments in the Countryside

Policy 33 – Occupational Dwellings in the Countryside

11 - Implementation

Appendix A – Replaced and Saved Policies

Appendix B – Removal of Settlement Boundaries

Appendix C – Standards and Guidance for Parking Provision

Appendix D – Glossary of Terms

Policy 3-Climate Change

para 4 includes " There is now an overwhelming body of evidence accumulated by the Intergovernmental Panel on Climate Change (IPCC) indicating that the global climate is warming.....retreating glaciers etc.....

There are 2 issues here as I (a non-expert) see it: Climate Change.
Global Warming.

Whatever the causes I accept climate change exists and always has, a normal phenomenon.

However, Scientific opinion is split on " global warming. " Since the IPCC formulated their statement quoted in the Plan, things have moved on.

I find it hard to accept global warming, when in Minneapolis, where my sister-in-law lives, the temperature was minus 31 degrees this January 2014 and in Montana minus 53.

Indeed a scientific research team headed South to Antarctica to prove the threat to mankind from global warming by establishing that the region is melting & found themselves trapped on their ship in unexpectedly thick pack ice. This expedition cost £900,000 and included climate Scientists, an Australian Green MP, 2 Environmental journalists from the Guardian newspaper and a BBC Science journalist. This year it emerged that Arctic summer ice coverage had increased by 29 per cent over the same period last year (not global warming etc) The full story is in the Daily Mail 11 2014 by James Delingpole and reveals the vested interests of Professor Chris Turney Expedition Leader.

This is a huge topic and for the purpose of a response to the Local Plan is probably best kept out of because of vested interests etc

So whatever the truth let's look at the plan.

I see no harm in encouraging energy efficient & renewable energy measures in existing properties BUT am concerned that fitting such appliances cannot be "sympathetically " done in unique truly heritage listed properties eg thatched houses. Conservation areas should be protected. I understand Councils would prefer solar panels to be put on the rear part of roofs but cannot enforce this? Maybe a local plan could require that no solar panels can be placed on any frontage to preserve the character of such areas ...particularly relevant in Dorset Conservation Villages.

para 4.13.....Agree with the need for facilities to avoid unnecessary travel. This is why it is imperative to retain a regular bus service in villages like MSA.

Cycling is only a viable safe option if country roads are invested in to remove potholes and drainage properly maintained with other measures to prevent flooding.

Para 4.23...& para 4.27 refers to flooding MSA is an expert on this topic. Water naturally runs off the hills, drainage is Victorian, streams are insufficiently dredged and foliage not regularly removed. The problem escalates when new building projects are added without a condition being placed on developers' prior granting planning permission to take responsibility to improve drains or create some flooding prevention scheme.

Para 4.26....Use of Water Butts is a sensible suggestion but if people are unwilling to pay out or cannot afford the extra outlay perhaps a scheme to provide free butts could be created or local fund raising done for such provision.

Para 4.30...Absolutely disagree.....development should NOT be proposed in areas of flooding.

MSA is about to have 2 appeals considered at Inspectorate level regarding the land adjacent to Bramble Cottage. Whilst infill development is always preferable to rural sprawl the voice of localism should be heard. Building should fit in with surrounding property & 3 storey development here with detached garages is not appropriate on such a small site.

Flooding occurred here recently so any property would need to be on stilts & drainage here is already inadequate.

Heritage hedging was removed and as far as I know no action taken. Plans and laws are only worthwhile if compliance is required.

Para 4.33 ...agree with tree planting but trees must be suitably sited so as not to cause root damage to highways and properties.

Existing trees should be required to be annually pruned as appropriate. (eg Chapel Lane & St Andrew's View to name but 2 obvious examples)

Para 4.34....This I find confusing as if the walls of new build is properly insulated with double glazing , then extended roof eaves would not be required , making buildings more affordable for local people.

Para 4.35.....Agree car sharing etc BUT am very angry regarding the renewable energy propaganda dropped in as "energy part ownership"

Informed people like local Action Groups and Parish Councils are aware this refers to Wind Turbine "benefit" recognised locally as Energy Company bribes!

There are 3 Industrial sized Windfarm proposals in the Dorset Area (2 in West Dorset, but still affecting Villages in close proximity in the North) and now another in Winterborne Whitechurch North Dorset. (despite previous rulings that Winterborne Kingston & Silton were inappropriate RURAL sites)

The point here is that hard pressed taxpayers many in fuel poverty, are contributing to the millions paid to these Energy private companies then insulted by the return of their own money in minimal payments. It doesn't matter what pot pays the subsidies it is still taxpayer money and local Councils should not be forced by local plans to be involved in such a charade.

Renewables....Solar

Solar systems are acceptable on suitably shielded sites But sites should not be of disproportionate size such as the 174 acre Mapperton site!
Perhaps a size maximum should be written into plans with Visual Impact consideration with screening.

Renewables....Wind Turbines

Small under 15m height Turbines for individual use, again appropriately sited are acceptable in my opinion. (eg for personal use on farms)
With a condition attached no more than 2 are allowable, to avoid constant additions to a full scale wind farm occurring by stealth.They should be sited so as not to impact on neighbouring properties whether tenanted or otherwise.

Large scale windfarms are the topic of the day now , and should be refused when they impact on AONB in accordance with recent Government Policy Changes.
Local Plans could write in a requirement not to be sited within 2 kilometers of residences. (adopting the 2km guideline adopted elsewhere by other authorities.)
This would alleviate future claims for compensation on health & safety grounds relating to noise & health issues for vulnerable people or even on property loss of value etc.

MOD objections past and present have been made to such developments on grounds of Radar and wireless interference on safety grounds so should be written into Plans here .

(The Blandford Triangle within which interference occurs and the Helicopter etc routes around several Villages.) All documented in past applications.

Horse Riding Society Safety guidelines (generally 3 x height of Turbine away from Bridleways) should definitely be incorporated to protect the rural way of life gradually being eroded.

Dorset is full of Heritage, buildings and archaeology (recent digs in the immediate vicinity etc) and Thomas Hardy Cultural interest brings a much needed Tourist boost to the economy. We privileged to live here look to Councils with local plans to be Guardians of this Heritage for future generations. Once lost it can never be replaced and Dorset is one such place.

The reasons to refuse large Windfarms are well documented and include many many other issues eg. harm to wildlife.

Local roads are inadequate to cope with heavy construction & Industrial maintenance traffic, already fully utilized etc.

Safety issues have not been resolved....." fall over guidelines" exist because despite what Energy Companies state they can fall over, even explode with other periods when ice is thrown off ...shadow flicker etc.

...Restoration of Sites.(after 20/25 years)

Removal and restoration...sounds good in theory doesn't happen in reality!
When planning renewal was refused in an area in Yorkshire the concrete base pads were left in situ. leading Councillors to complain that the site now looked like "a concrete graveyard"

When I attended the recent Broadview presentation for their proposal near Charminster I raised my concern about this.

The Company representative explained that removal & grinding down of concrete bases caused more harm with CO2 emissions so it was better to leave them in place!

Turbines are transported into the UK from places like Denmark increasing CO2 and material used in the manufacture of wind turbine magnets has polluted China's Lakes!

Local Targets.....it is in the public domain that targets for 2020 have already been met without the need for a single additional Turbine. (CPRE & numerous objection letters on the "Dorsetforyou" website reference the West Dorset Wind Farm application mention this....over 1000 objectors on one application alone, should not be ignored (localism)

FinallyEnergy production is intermittent as informed people are finding out....no wind no energy, high wind danger required to switch off.The National Grid cannot store excess energy produced. Giant pylons are now being proposed in addition to Turbines in some areas to transport energy to the Grid.....
Conventional back up is still required for Energy supply.