

Milborne St Andrew Neighbourhood Plan 2018 to 2033

Submission Regulation 16 Consultation

North Dorset District Council Response

North Dorset District Council (NDDC) welcomes receipt of the submission version of the Milborne St Andrew Neighbourhood Plan. The Council is aware of the various consultation events held within the local community to identify issues and draw conclusions etc and in this context seeks to provide constructive comments on the finalisation of the Plan.

For ease of reference, comments are set out according to the policies of the submission version of the neighbourhood plan. Some comments may cover more than one topic and should be seen in this context. The comments made in this response should not be seen as exhaustive and the officers continue to encourage an on-going dialogue with the Neighbourhood Plan Group and the Qualifying Body.

General Comments:

The submission version of the Plan appropriately seeks to deal with issues of a local nature including the built and natural environment, the local economy and a proposed allocation to meet local housing needs.

Detailed Comments:

Policies Map

The Policies Map is currently split across two separate pages. The Plan would benefit from having the policies map fitted onto a single page but if this is not possible, perhaps the maps could be titled east and west?

Policy MSA2. Meeting Housing Needs – Dwelling Types

The changes to the policy since the previous version of the plan are noted. However, the penultimate paragraph would benefit from further clarification. It currently states that “Where appropriate, conditions will be attached to planning permissions for new dwellings in order to restrict their future extension, so that the adverse impacts of any reduction in the availability of smaller, more affordable homes (including open market dwellings) can be considered.”

It would seem more logical that potential adverse impacts are considered before conditions are applied in order to ascertain whether conditions are actually necessary.

Policy MSA3. Meeting Employment Needs – Business Requirements

The changes to the policy since the previous version of the Plan are noted and provide sufficient flexibility within the policy.

Policy MSA6. Settlement Boundary

NDDC considers that proposed site allocations should be located within settlement boundaries and that where allocations adjoin or fall outside existing settlement boundaries, those boundaries should be amended to take account of the gross site area of the proposed allocation.

It is noted that the Milborne St Andrew Plan (at Para 4.4.2) explains why this approach has not been followed in relation to the Camelco site and that the settlement boundary may be better established as part of the site’s future development. However, this would seem to contradict the ethos of a plan-led system which underpins the town planning process. In terms of other neighbourhood plans in North Dorset that have allocated sites, examiners have concluded that sites should be included with the settlement boundary.

The Council therefore recommends that that the settlement boundary is amended at this location in accord with the anticipated land take for the proposed development and to avoid future conflict with the countryside policies of the adopted North Dorset District Local Plan. Getting the revised boundaries in place at this stage will avoid the need to make changes at the neighbourhood plan review stage or through the local plan review process.

Policy MSA9. Reinforcing Local Landscape Character

The changes to the policy since the previous version of the Plan are noted and provide a more accurate description of the landscape character around the Bere Stream.

Policy MSA11. Local Green Spaces

The changes to the policy since the previous version of the Plan are noted and provide greater parity with the definition of Local Green Space in the National Planning Policy Framework (NPPF). In light of the recognition that such designations should only cover areas that are demonstrably special or hold a particular local significance, it is recommended that some sites included in Table 7 would benefit from further clarification as to why they have been chosen. For example, site LGS6 – Parish Pit (Ansty Lane Common) is referred to only as a “Small area of Common Land off Dewlish Road, with chestnut trees and bench.”

Para 6.16

The changes since the previous version of the Plan are noted and help provide a useful clarification of the Plan's expectations for improving recreation opportunities. Table 8 is particularly valuable in helping to apply current Fields in Trust green space standards to the Neighbourhood Plan Area based on population and existing provision.

Para 6.18

This has become a very long and wordy paragraph and would benefit from being split into two more distinct paragraphs.

Policy MSA12. Improving Recreation Opportunities, and having regard to European and internationally protected sites

A Habitats Regulations Assessment, and potentially an Appropriate Assessment, will be required before the Plan is examined in order to help justify the stance taken and to avoid the Plan having an adverse effect on the integrity of European and internationally important wildlife sites.

Policy MSA13. Locally important character features

The policy refers to "features that are particularly iconic to the character of the village". Unfortunately, the term iconic is now vastly over-used and has become somewhat devalued as a result. Is there perhaps a more appropriate way to describe these features?

Policy MSA14. Character and Design Guidance

This is quite a lengthy policy, the second paragraph of which may benefit from being broken down into two more 'digestible' paragraphs instead.

Much of the policy content could equally well have been set out as supporting text as it is rather prescriptive. If the full text is to remain as a policy, it should look and read more like a policy and not look and read like supporting text.

Policy MSA15. Minimising Flood Risk

As part of the earlier consultations on the plan, the Council queried whether the approach to flood risk was justified as it deviates from minimum national standards on requiring sustainable drainage on sites of 10 or more dwellings. The Council recognises that circumstances within Milborne St Andrew are not usual and, after further dialogue, it accepts that the standard approach to flooding is not likely to be sufficient to avoid increasing flood risk within the village. The Council also recognises that NPPF standards are intended as a minimum and do not prohibit a more rigorous approach, which in this case, is supported by Wessex Water.