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MILBORNE ST ANDREW NEIGHBOURHOOD PLAN 2018 TO 2033 Regulation 16 Consultation 18 January to 1 March 2019

Response Form

The proposed Milborne St Andrew Neighbourhood Plan 2018 to 2033 has been submitted to North Dorset District Council for examination. The neighbourhood plan and all supporting documentation can be viewed on the District Council's website via: <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/north-dorset-planning-policy/local-planning-policy-north-dorset.aspx>

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy (North Dorset), South Walks House, South Walks Road, Dorchester, Dorset, DT1 1UZ

Deadline: 4pm on Friday 1 March 2019. Representations received after this date will not be accepted.

Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule and privacy policy (<https://www.dorsetforyou.gov.uk/privacypolicy>). Your data will be destroyed when the plan becomes redundant.

*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

	Personal Details (if applicable)*	Agent's Details (if applicable)*
Title		
First Name		Portia
Last Name		Banwell
Job Title (where relevant)		Planner
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Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other <i>Please specify:</i>

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	<input checked="" type="checkbox"/>
Section	
Policy	MSA1, MSA5
Page	
Appendix	

3. Do you wish to? *Please tick one box only.*

<input type="checkbox"/>	Support
<input checked="" type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation

4. Please use the box below to give reasons for your support/objection or make your observation.

Our representation that was made at the pre-submission consultation on the 3 September 2018 still stands and has been submitted again with this form for completeness.

Our objection is summarised below.

Our concerns are raised on the basis of the failure of the draft plan to meet the following tests of the TCPA:

- The plan fails to achieve sustainable development (TCPA, paragraph 8(d), Schedule 4B); and
- The plan is not in general conformity with the strategic policies of the development plan for the authority, the North Dorset Local Plan 2016 (TCPA, paragraph 8(e)).

This is for the following reasons:

- The plan only allocates a single site for development and does not, therefore, have sufficient flexibility to meet the strategic housing policies of the development plan;
- The single site allocated is not sustainable compared to all reasonable alternatives;
- The plan fails to meet its identified affordable housing needs¹ and therefore the strategic policies of the development plan;
- The Neighbourhood Plan period follows the extended period of the emerging North Dorset Local Plan (up to 2033). There will be a significant uplift in its housing growth requirement dictated by the new National Planning Policy Framework (the Framework) method for calculating housing need. The plan is not capable of meeting this uplifted housing requirement and should be future proofed;
- The Plan's failure to meet its housing requirements is compounded by the fact that that the plan's only allocation is not deliverable. This is due to the costs associated with bringing forward this brownfield site acting in combination with the cumulative policy burdens imposed on it. It is also not the most appropriate location for development having regard to established

- sustainability criteria. Other sites perform better, not least the Homefield site; and
- On this basis, the plan is likely to fail to deliver the community facilities identified by the local community and described in the Neighbourhood Plan⁴. It will therefore fail to achieve a sustainable form of future development for the village.

We support the point in MSA1 which states that unallocated greenfield sites outside of the settlement boundary could be released if the site would deliver substantial community benefits.

5. Please give details of any suggested modifications in the box below.

The Neighbourhood Plan should be modified to ensure necessary flexibility exists to achieve the development needs required of it by the strategic policies of the development plan and the community facilities (and thereby the sustainable development) required of it by the local community. This would be best achieved by allocating the Homefield site for development which, by the plan's own admission, scores highly in the Sustainability Appraisal and was a 'top scoring site' in the 2017 options consultation informing the plan strategy.

The Neighbourhood Plan should be modified to allocate the Homefield site. The Homefield site is the only site in the village of the type and scale that could viably deliver the village's growth requirements in a sustainable and environmentally sensitive way because it is located centrally.

On this basis, we suggest that the policy we have suggested on page 10 of our attached representation is provided either in substitution or addition to Policy MSA5. (Development of the Camelco Site). If it is in addition then our recommendation is that the Camelco site is identified as a reserve to meet future development needs. It is our intention to deliver the need identified in the Neighbourhood Plan in a viable and sustainable way in one location, and therefore help the Plan to meet its objectives. For all the reasons set out above we consider this a more preferable option to splitting growth across two or more sites. We note that in order to achieve this the Proposals Map will also need to be modified to identify our site for development.

It should also be noted that an application has been submitted to support the development of the Homefield site and has been assigned planning application reference 2/2018/1577/OUT. This is supported by a community facility to meet the need identified in the Neighbourhood Plan, highways

improvements, deliverability statement and a SANG strategy which has been agreed with Natural England. The proposed SANG is larger than required for the Homefield site and can contribute to achieve the wider SANG strategy advanced by the Neighbourhood Plan. The planning application has been through statutory consultation and no insurmountable technical issues have been identified, proving the Homefields to be technically sound, viable and deliverable.

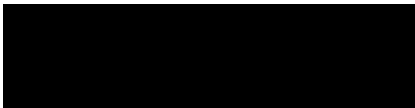
Please read this in conjunction with the previous representation made in September 2018. It has been submitted again with this form for ease of reference.

Continue overleaf if necessary

6. Do you wish to be notified of the District Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Signature:



Date: 1 March 2019

If submitting the form electronically, no signature is required.



Milborne St Andrew Neighbourhood Plan

Pre-submission consultation

Wessex Strategic Ltd, Homefield

3 September 2018

Prepared by: Catherine Norris / Alan Pearce

Reviewed by: Simon Fitton

Alder King Planning Consultants

Pembroke House, 15 Pembroke Road, Clifton, Bristol BS8 3BA

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Appendix 1: Site location plan

Appendix 2: Indicative Site Layout

1.0 Introduction

- 1.1 We write to provide comments on the Milborne St Andrew Neighbourhood Plan (July 2018) in order to participate in the pre-submission consultation. Our comments are submitted on behalf of our client, Wessex Strategic Ltd who has a controlling interest in the land to the south of Blandford Hill and to the west of Lane End, Milborne St Andrew; the site is known as 'Homefield'. Our client's land interest is shown in **Appendix 1: Site Location Plan** and our client's development proposal for the land is shown in **Appendix 2: Development Proposals**. Our development proposals have already been shared with the Neighbourhood Plan Group (NPG) and are included in the consultation documents forming part of the Neighbourhood Plan pre-submission consultation. This plan represents the latest update based on our now completed technical review of known constraints.
- 1.2 Our client is seeking to advance their development proposals for the site in consultation with the local community, having consulted with the NPG in Summer 2018 and submitted a pre-application enquiry to North Dorset District Council in August 2018. As communicated to the NPG, once the Neighbourhood Plan consultation closes on 3 September 2018, we intend to formally consult the local community on our development proposals, seeking their views at an exhibition to be held before we submit our planning application. The purpose of our planning application will not be to circumvent the neighbourhood planning process, rather, given the level of interest from speculative planning applications in the village, to support the Neighbourhood Planning process by bringing forward development on a highly sustainable site in collaboration with the NPG and the local community.
- 1.3 Within this context, we commend the Milborne St Andrew NPG in producing a well written, well thought out Neighbourhood Plan for the area, which has clearly been subject to a considerable amount of work during its four year term of production. We look forward to working with the NPG to realise the successful adoption of the Neighbourhood Plan in the earliest possible course.
- 1.4 Our client has a strong track record in delivering sustainable, high quality development proposals, in close collaboration with local stakeholders, residents and interested parties. Our client is firmly supportive of the neighbourhood planning process in allowing local communities to play a real and tangible role in determining growth requirements and development patterns. This being the case, we are very keen to ensure that the Milborne St Andrew Neighbourhood Plan doesn't become a lost opportunity for the village, in light of the concerns that we raise in this representation.

Our concerns

- 1.5 Our client has significant concerns that the Neighbourhood Plan, in its current form, does not meet the minimum requirements of paragraph 8, Schedule 4B to the Town and Country Planning Act (TCPA) 1990 and, on this basis, could not meet the tests of independent examination, proceed to referendum and be successfully adopted.
- 1.6 Our concerns are raised on the basis of the failure of the draft plan to meet the following tests of the TCPA:
 - The plan fails to achieve sustainable development (TCPA, paragraph 8(d), Schedule 4B); and

- The plan is not in general conformity with the strategic policies of the development plan for the authority, the North Dorset Local Plan 2016 (TCPA, paragraph 8(e)).

1.7 This is for the following reasons:

- The plan only allocates a single site for development and does not, therefore, have sufficient flexibility to meet the strategic housing policies of the development plan;
- The single site allocated is not sustainable compared to all reasonable alternatives.
- The plan fails to meet its identified affordable housing needs¹ and therefore the strategic policies of the development plan;
- The Neighbourhood Plan period follows the extended period of the emerging North Dorset Local Plan (up to 2033). There will be a significant uplift in its housing growth requirement dictated by the new National Planning Policy Framework (the Framework) method for calculating housing need. This method, alongside the 2018 household projections, is due to be published in Sept/October 2018. The plan is not capable of meeting this uplifted housing requirement and should be future proofed;
- The Plan's failure to meet its housing requirements is compounded by the fact that that the plan's only allocation is not deliverable². This is due to the costs associated with bringing forward this brownfield site acting in combination with the cumulative policy burdens³ imposed on it. It is also not the most appropriate location for development having regard to established sustainability criteria. Other sites perform better, not least the Homefield site; and
- On this basis, the plan is likely to fail to deliver the community facilities identified by the local community and described in the Neighbourhood Plan⁴. It will therefore fail to achieve a sustainable form of future development for the village.

A proposed solution

1.8 The Neighbourhood Plan should be modified to ensure necessary flexibility exists to achieve the development needs required of it by the strategic policies of the development plan and the community facilities (and thereby the sustainable development) required of it by the local community. This would be best achieved by allocating the Homefield site for development which, by the plan's own admission, scores highly in the Sustainability Appraisal and was a 'top scoring site' in the 2017 options consultation informing the plan strategy⁵. Unfortunately, at the time of selecting sites to be allocated in the Plan, we understand that the NPG did not consider there to be enough information about the development proposals at

¹ Draft MSA Neighbourhood Plan (July 2018), page 12, Table 1

² As defined by the National Planning Policy Framework (the Framework, 2018), Annex 2 Glossary

³ Draft MSA Neighbourhood Plan (July 2018), Policy MSA5 and development plan policies

⁴ Draft MSA Neighbourhood Plan (July 2018), Section 4 (Supporting a working, active village)

⁵ Draft MSA Neighbourhood Plan (July 2018), paragraph 4.30, 4.31 and 4.32.

Homefield and therefore it was not included. We are pleased to note, however, that our client's positive engagement with the NPG is referenced in the Plan at page 22 as follows:

“The Neighbourhood Plan Group have also been contacted by another developer wishing to promote an alternative option on the Homefield site, who at the time of writing wished to work with the community ahead of potentially submitting a planning application.”

- 1.9 Our client intends to continue on this theme of positive engagement at our public consultation event in September, during the determination of our planning application and throughout the implementation of our proposals. In this spirit of collaboration and interest in delivering sustainable development and as a proposed solution to the issues we raise with the Neighbourhood Plan, we suggest the policy modifications necessary to allocate our site for development and thereby meet the tests of examination. We would be pleased to work with the NPG to see these changes implemented, without compromising the overall programme for adoption.
- 1.10 Within this context, the remainder of this representation sets out our concerns with the Neighbourhood Plan in its current form, turning to the required policy modifications and way forward in the final section.

2.0 Housing need

- 2.1 The development plan is provided by the North Dorset Local Plan, 2016 (NDLP). This describes the development requirements for the District over the 20 year plan period (2011 to 2031) and the manner in which the required development should be distributed throughout the District.
- 2.2 NDLP Policy 6 provides a total of at least 5,700 homes for the District over the 20 year plan period (2011 to 2031) at an annual rate of 285 homes per annum. It is worth noting that the 2012 SHMA identified a need of 340 affordable homes per annum over the first five years of the plan period in the District. This need is not going to be met given it is higher than the market and affordable provision combined and will inevitably worsen over the plan period. That is not uncommon insofar as the affordable need can be so acute that planning and new housing delivery cannot always resolve the problem. It is a very real problem and the LPA will have to do more to meet this need in any plan review.
- 2.3 The policy defines at least 4,935 homes to be directed towards the District's four main towns with at least 825 homes in the rural areas. The rural allocation is to 'Stallbridge and the 18 'larger villages' including Milborne St Andrew (approximately 15%). Although the policy doesn't confirm the way in which this requirement should be distributed leaving it instead to the Neighbourhood Plan process, one measure is a pro-rated requirement which, at Milborne St Andrew, would give rise to at least 43 homes over the plan period.
- 2.4 The supporting text to NDLP Policy 8 describes the level of affordable housing need in the District was defined by the DCLG housing needs model supporting the SHMA 2012, and required 387 affordable homes per annum over a 5 year period (1,935 homes) to meet need. The policy confirms that outside the four main towns this will be delivered by requiring 40% of new housing developments to be affordable. Applying this percentage to the identified need of at least 825 homes would indicate delivery of 330 homes which if

attributed to the 19 settlements would result in 17 affordable homes in any given settlement. In reality, there is precious little prospect of that quantum of affordable homes being delivered as so much of the 825 homes will be delivered on small sites/windfall development that falls under the threshold for the affordable requirement to be triggered.

- 2.5 This level of housing growth (32 homes) would deliver up to 13 affordable homes for the village over the 20 year plan period on a policy compliant basis and planned growth will not therefore meet the identified need for affordable housing. For the reasons set out below we do not consider that the Camelco site can deliver that quantum of affordable housing given the viability issues that exist.
- 2.6 We note that some 'windfall' growth is allowed for in draft Policy MSA1 (Meeting Local Needs – Amount and Location of New Development) which may make some contribution towards affordable housing growth, however, as the growth is not planned, we are unable to make assumptions about the amount of affordable housing that could be delivered. These windfall sites are likely to fall under the policy threshold and not contribute to affordable housing in any event, as referred at paragraph 2.3.
- 2.7 The updated SHMA (2015) prepared by GL Hearn indicates an increased housing requirement beyond the Local Plan figures. The SHMA identifies an annual affordable housing need of 146 homes which over the plan period would give rise to 2,920 homes. If applied on the same 85/15 split of town/rural settlements this would indicate need for 438 homes in the rural areas or 23 homes in Milborne St Andrew.
- 2.8 Housing delivery in North Dorset is defined at paragraph 2.26 of the SHMA 2015 as below target between 2006 and 2013 where only 73% of the target has been achieved. Furthermore the SHMA 2015 OAN figures for 2013 to 2033 would require 330 homes per annum providing an overall figure of 6,600 for the new 20 year plan period as opposed to 5,700 in NDLP Policy 6. This represents an increased housing need in the District of over 15%. Applying this additional need on the same distribution would require 990 homes rather than 825 homes and this if applied pro-rata across the 19 rural settlements would require 52 new homes (21 affordable) in Milbourne St Andrew.
- 2.9 The need is in fact greater than the SHMA 2015 identifies; as correctly acknowledged in the draft Neighbourhood Plan⁶, national planning policy indicates that 7,320 homes will be required in the District in the future, an uplift of 1,620 homes beyond current plan targets⁷. Rather than pre-empt the distribution of housing attributed to Milborne St Andrew as part of any future plan, we use this to simply say that the pressure to deliver housing growth in Milborne St Andrew is only likely to increase in the future. This would imply that there is a need for the NDP to accommodate more growth than anticipated and the Homefield site is the most sustainable way to achieve this in our view whether that be, in isolation, or with Camelco.
- 2.10 The National Planning Policy Framework (2018) states at paragraph 29 that:

⁶ Draft MSA Neighbourhood Plan (July 2018), Paragraph 1.5

⁷ We note that these figures will be updated by national planning policy guidance later on this autumn once the 2016 household projections are published in September 2018.

“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”

2.11 We therefore **object** to Policy MSA1 (Meeting Local Needs) on the following basis:

- The policy text which notes that “sufficient sites are allocated in the Neighbourhood Plan”: Only one site is allocated and as a result, this text is not correct (refer to suggested policies modifications under Section 4: A proposed solution below); and
- The projected need of 56 homes or 32 after commitments is not sufficient for the plan to meet its requirements for open market and affordable housing growth under the strategic policies of the development plan and does not future proof the emerging known need.

2.12 Our objection could be overcome by adopting the following modification to Policy MSA1 with addition in **bold underline** and retraction in ~~strike through~~:

- Sufficient sites are allocated in the Neighbourhood Plan, which together with other limited infill and rural conversion, should more than meet the projected housing need of about 4.6 homes per annum over the plan period (2018 – 2033) **to specifically meet the identified need for affordable housing of 2.3 homes per year.**

3.0 Need for employment and community facilities

3.1 We note that the Plan sets a requirement for the following facilities to be delivered over the plan period as demonstrated by opinion canvassed from parties including local service providers via a 2016 survey:

- Employment: To meet the local need for small scale workshops/studios, the extension to existing employment sites or provision of new employment sites for small-scale workshop / studios will be supported;
- New surgery: 150 sq. m building (estimated floorspace) with flexibility for expansion / contraction of services. Modular / standard rooms sizes preferred (8 sq.m, 12 sq.m, 16 sq.m and 32 sq.m) with two parking spaces per consulting room plus one for every full-time staff, suggesting approximately eight spaces would be needed;
- Pre-school: 105 sq. m to 150 sq. m (minimum to ideal) plus outdoor area and parking / drop off facilities. Access to safe play areas. 1 space per 2 full time staff, plus visitor, plus disabled provision suggesting approximately 5 spaces plus overflow provision for drop off / collection times; and

- Otherwise, the Plan identifies the desire for a coffee shop in the village and to protect and enhance existing outdoor sport and recreation⁸.

3.2 Our client's approach is to ensure that community facilities are delivered with evidence of local need and in collaboration with the local community. We have therefore contacted service providers in order to determine whether the 2016 survey of local need is up to date. The doctor's surgery has confirmed that a new facility could not be supported at the moment but may be considered in the future.

3.3 On this basis, we **support the identified need for employment and community facilities subject to the following modifications** to the draft Plan (with additions in **bold underline**):

- The following text is added to paragraph 4.11 together: "**Up to date assessment of need (2017) suggests that the surgery is not required immediately but may be required at a later stage in the plan period.**" The following text should be added to the specification for the new surgery premises that sits alongside this paragraph: "**Given that the timings for when this facility is required to be delivered are not yet known, a site of sufficient scale should be allocated to deliver this facility as part of an application or the land 'reserved' for later delivery.**"

4.0 Plan strategy

4.1 The plan envisages that its required development needs would be delivered through the following plan policies:

- 1) Policy MSA1 (Supporting community facilities): The housing need will be delivered via Plan allocations and/or "through the release of unallocated greenfield sites outside of the settlement boundary for open market housing" where "it can be demonstrated that there is a local need for additional housing that will not otherwise be met or substantial community benefits to justify their release"
- 2) Policy MSA3 (Meeting employment needs – Business Requirements): The employment need arising would be met on sites "adjoining the settlement boundary, adjoining an existing employment site (as shown on the Policies Map) or adjoining an existing farm building complex"
- 3) Policy MSA5 (Development of Camleco Site): The Camleco site is "allocated for a mix of housing, employment and community facilities, and subject to all of the following requirements." The requirements for this 2.2ha site are summarised as follows:
 - a) Remediating contamination on the site;
 - b) New vehicular junction;
 - c) Contributions towards pedestrian improvements in the village centre;
 - d) A new bus shelter and bus set down area;

⁸ Page 15 to 19 respectively

- e) High quality architectural design;
- f) f) At least 32 homes are provided, and the type and size of housing accords with Policy MSA2, and detailed design accords with Policy MSA14.
- g) The development of a branch surgery and pre-school;
- h) Equipped play space (180 sq. m) and informal play space (4000 sq. m);
- i) Employment land taking up 5% of the site area (110 sq. m assumed);
- j) Parking provision;
- k) Substantial landscape planting to minimise long distance views from Weatherby Castle (size unknown
- l) Offsetting the loss of hedgerow and wildlife habitat;
- m) An area of community woodland to be provided within safe walking distance of the site (size unknown
- n) Sustainable alternative natural greenspace (SANGs) provision
- o) Archaeology investigation before development;
- p) Surface water and drainage plan.

4.2 We have the following comments on these policies:

- Policy MSA1 (Supporting community facilities): We **support** the strategy not to provide a ‘cap’ on the amount of development that could be achieved in the village where it would meet identified housing need or deliver substantial community benefit, which is considered to be supported by planning policy at all levels⁹. We **object** to the amount of development planned for the village which is not at a scale that will 1) deliver the amount of development required to meet housing and affordable housing need or 2) deliver the significant amount of community facilities required within the plan period in a co-ordinated and viable manner;
- Policy MSA3 (Meeting employment needs – Business Requirements): We **support** this policy which directs new small scale employment development to areas adjoining the settlement boundary or alongside other employment sites. This is, to our mind, sensible and accords with national planning policy and the development plan for the area. The Homefield site can assist in this regard being of sufficient scale to accommodate well located business and community uses as part of a housing scheme;
- Policy MSA5 (Development of Camleco Site): We **object** to this policy on the basis of viability and that it does not represent sustainable development when compared to reasonable alternatives. Our consultant team’s initial work has demonstrated that the development of the allocation is not

⁹ NPPF 2018 – paragraphs 72, 78

deliverable due to 1) the quantum of residential development proposed; 2) acting in combination with the policy requirements imposed on the site's delivery by Policy MSA5.

We have serious doubts whether the policy objectives can be delivered given the site's brownfield nature, potential costs of demolition, site clearance, possible contamination and any additional development costs as a consequence of these site preparation works. These costs are likely to be greater than for a greenfield site and if all the policy objectives cannot be delivered because of the costs necessary to deliver the scheme then the Authority run the risk of the landowner/developer seeking to significantly reduce the impact of the policy requirements for the site on viability grounds which could mean a significant reduction in both the overall amount of affordable housing on the scheme and also the tenure split between rented housing and various forms of intermediate shared ownership/low cost housing.

Due to these issues, the site would not generate a land value, would not generate a developer profit and would not deliver any affordable housing for the village over the plan period. An overview assessment of this site compared to the Homefield site is provided below.

- 4.3 For the avoidance of doubt, the definition of deliverability adopted for the purpose of assessing Policy MS5 is the same as that contained in the Framework (2018) and provided as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of homes or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

Assessment of Camelco and Homefield

Planning

- The allocation of the Homefield site would provide greater flexibility in meeting housing needs and the community facilities and allow coordination of obligations to ensure delivery of S106, rather than potentially not being delivered if only the Camelco site is allocated. A piecemeal approach rarely delivers the benefits required by policy given the viability issues already highlighted and that coordination across S106s can be difficult in delivering genuine community benefit.
- The Homefield site is in a more sustainable location and is a more logical extension to the settlement providing a connection between the core of the village and the associated facilities and the sports hall and allotments to the east which otherwise could appear isolated. As the site is larger it can be planned in a more sensitive way than Camelco in order to be viable and achieve the required housing numbers thereby protecting other potential sites in the village from coming forward. In other words by allocating

the Homefield site it provides a greater amount of housing and protects the NDP and Local Plan from future applications by ensuring delivery. The site could potentially deliver more homes that meets the needs of subsequent plan periods. Certainty for the community would be established.

Landscape

- In respect of landscape the Camelco Site has Weatherby Castle (Scheduled Ancient Monument) approximately 1.5km to the south, and views are also from Lane End and the road to Bere Regis to the SE. The Camelco site is seen in views from the south against the backdrop of the Milborne Business Centre and existing housing in this area and the woodland backdrop to the north.
- A substantial screen would be required to effectively screen the development in the views – there is limited opportunity to achieve this and the current scheme shows a 5m wide planted area along the southern boundary (narrowing in the western portion of the site), which is backed onto by proposed homes. This narrow landscape buffer would provide limited screening and would be under pressure from residents of the proposed homes whose gardens would be shaded by the planting.
- The Homefield Site is significantly less visible in views from the south/SE, where it sits behind the local ridge that runs beneath Lane End. The Homefield site will potentially be more visible in longer range views (2.5km plus) from the NW (potentially in views from the AONB), but these views will be seen in the context of the existing village and homes on Homefield and the A354. Our proposed layout locates homes away from the most visible part of the site (adjacent to existing homes) and generates a generous landscape framework which will reduce the effect of the development in the potential views (as well as providing amenity, play etc).
- The Homefield site also offers significantly greater opportunity to locate facilities close to the existing village centre, with safe walking/cycling connections to the village core and existing properties. This is significantly less achievable on the proposed site.

Ecology

- The Camelco site would result in greater impact from an ecological perspective than development at Homefield.
- Not only will the biodiversity present within this area be directly impacted by the proposals, the inevitable impact of lighting reaching ever further from the village into the wider landscape will impact up on a range of organisms including bats and insect species. The site is identified as suitable habitat for nesting birds, reptiles, amphibians and bat foraging – additionally these mosaic type habitats often have invertebrate habitat for a range of species. Dormouse and bat foraging are also identified on land to the north.
- The introduction / increase of pet cats into this area and adjoining areas of woodland will directly impact upon all manner of species including birds / small mammals and reptiles. From a biodiversity perspective it is usually far better to develop on 'infill' sites rather than extend into the landscape.

5.0 A proposed solution

- 5.1.1 Our proposed solution to the inherent issues identified with the Milborne St Andrew Neighbourhood Plan are to **modify the plan policy to allocate the Homefield site**.
- 5.1.2 The Homefield site is the only site in the village of the type and scale that could viably deliver the village's growth requirements in a sustainable and environmentally sensitive way, including high quality architectural design and a low density of development. Unlike other developers active in the area, our position is that we want to work closely with **all relevant parties** to achieve the growth requirements of the Neighbourhood Plan. This includes local people, service providers, business people, local councillors and the NPG, noting the Neighbourhood Plan aspiration to achieve a Community Land Trust (Policy MSA 1: Community Land Trust) which we would be happy to be a part of.
- 5.1.3 On this basis, we suggest that the following policy is provided either in substitution or addition to Policy MSA5. (Development of the Camelco Site). If it is in addition then our recommendation is that the Camelco site is identified as a reserve to meet future development needs. It is our intention to deliver the need identified in the Neighbourhood Plan in a viable and sustainable way in one location, and therefore help the Plan to meet its objectives. For all the reasons set out above we consider this a more preferable option to splitting growth across two or more sites. We note that in order to achieve this the Proposals Map will also need to be modified to identify our site for development:

Policy MSA5. Development of the Homefields Site

The Homefields site, as shown on the Policies Map, is allocated for mixed use of housing and community facilities, and subject to all of the following requirements:

- a) A new vehicular access is provided onto Lane End, designed to create adequate visibility to allow safe access / egress. An additional vehicular entrance to the site may also be feasible along A354, however, this should be sensitively designed to create a high quality entrance to the village and help slow traffic;
- b) Pedestrian access to/from the village centre to the site should be improved, along the existing public rights of way through the site. A safe and attractive link through the site to the Sports Field and allotments should also be created. Developer contributions will also be sought towards pedestrian improvements to the A354 in the village centre, as identified in Table 3;
- c) A bus improvement strategy should be devised in conjunction with pedestrian improvements to the village centre;
- d) The design of the development fronting onto the A354 should be of high quality to create a welcoming entrance point into the village from the east, including suitable planting and design. The location and design of any housing and garden areas along this frontage will need to take into account possible disturbance from the main road;

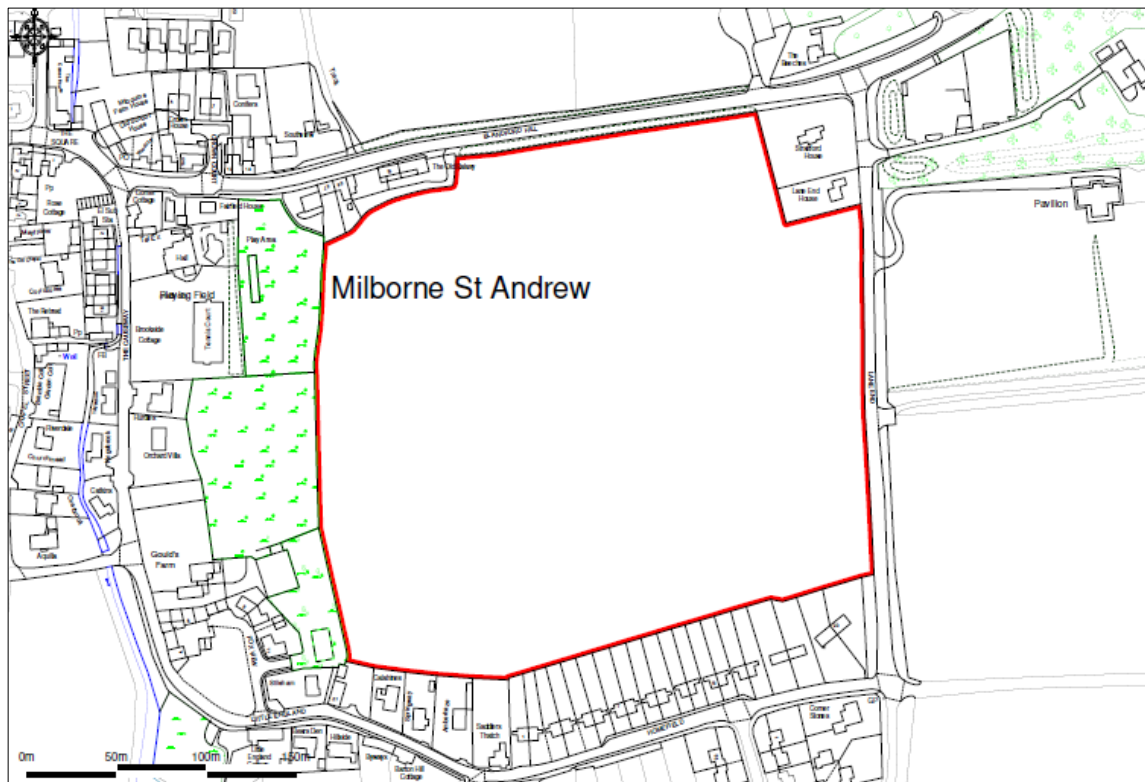
- e) At least 75 homes should be provided, and the type and size of housing accords with Policy MSA2, and detailed design accords with Policy MSA14;
- f) The community facilities include the provision of a building/buildings and associated land and parking suitable to accommodate a pre-school, in line with the requirements identified in paragraph 4.10 to 4.13 (or to an alternative specification agreed by the relevant service providers sufficient to meet projected needs over the plan period). Land should be reserved for the provision of a doctors surgery along the specification provided (in paragraph 4.10 and 4.11) to be delivered when it is required;
- g) The community buildings should be co-located and their parking provision designed to allow shared / flexible use and minimise disruption to nearby residential occupants
- h) At least 180 sq. m of equipped play space plus 400 sq. m of informal play space should be provided within the site in close proximity to the pre-school, in line with the standards set out in the latest Fields in Trust guidance
- i) A landscape scheme should be secured that provides substantial landscape planting using native species along key site boundaries, and pockets of amenity space within the development of sufficient in size to support mature trees, to visually integrate the site in this edge-of-village location and soften the visual impact of the development;
- j) A biodiversity mitigation and enhancement plan should be secured to off-set any loss of hedgerow and wildlife habitats likely to support protected species, to provide an overall biodiversity gain;
- k) Appropriate mitigation should be secured in line with the requirements set out in the Dorset Heathlands Planning Framework Supplementary Planning Document and the Nitrogen Reduction in Poole Harbour Supplementary Planning Document, in line with Policy MSA12;
- l) Archaeological investigation is undertaken prior to the site's development, and recording undertaken, to a level agreed as necessary by the County Archaeologist; and
- m) A surface water and drainage plan is secured to manage surface water run-off and foul water disposal from the site.

6.0 Conclusion

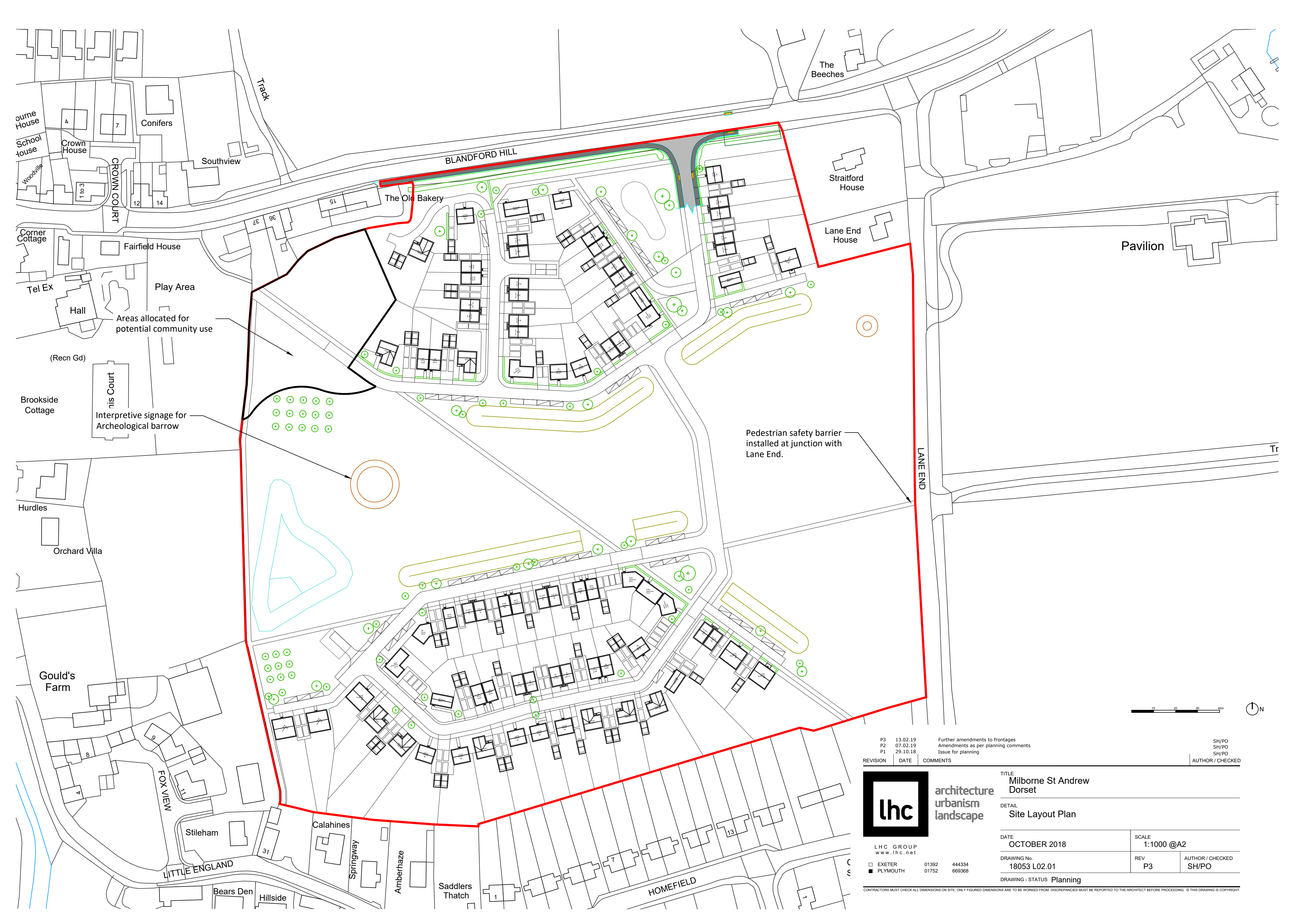
- 6.1 Our client has a strong track record in delivering sustainable, high quality development proposals, in close collaboration with local stakeholders, residents and interested parties. Our client is firmly supportive of the neighbourhood planning process in allowing local communities to play a real and tangible role in determining growth requirements and development patterns. This being the case, we are very keen to ensure that the Milborne St Andrew Neighbourhood Plan doesn't become a lost opportunity for the area, in light of the concerns that we raise in this representation.

6.2 We have suggested a number of policy modifications to overcome the concerns that we raise and would be happy to meet with the NPG to discuss these in more detail. Equally, we intend to seek the views of the wider community on our development proposals and would use this to feedback onto the Neighbourhood Plan at its next stage of consultation. Working in this way, we would work closely with the NPG to achieve the dates for adoption that is sought with a plan that robustly meeting basic conditions of the TCPA against which it will be examined.

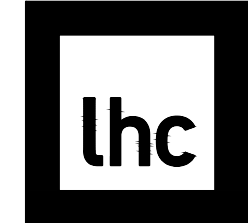
Appendix 1: Site location plan



Appendix 2: Indicative Site Layout



REVISION	DATE	COMMENTS	AUTHOR / CHECKED
P3	13.02.19	Further amendments to frontages	SH/PO
P2	07.02.19	Amendments as per planning comments	SH/PO
P1	29.10.18	Issue for planning	SH/PO



**architecture
urbanism
landscape**

TITLE
**Milborne St Andrew
Dorset**

DETAIL
Site Layout Plan

DATE
OCTOBER 2018

SCALE
1:1000 @A2

DRAWING No.
18053 L02.01

REV
P3

AUTHOR / CHECKED
SH/PO

DRAWING - STATUS **Planning**

<input type="checkbox"/> EXETER <input checked="" type="checkbox"/> PLYMOUTH	01392 01752	444334 669368
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