

Cranborne Chase Area of Outstanding Natural Beauty



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North Dorset District Council, West Dorset District Council
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By Email planningpolicy@north-dorset.gov.uk

15 January 2018

Dear Ed

North Dorset Local Plan Review; Issues and Options

Thank you for the opportunity for this AONB to respond to your Issues and Options Consultation. As you note in the document this Area of Outstanding Natural Beauty is one of two AONBs that, between them, constitute some 40% of North Dorset.

General comments, recommendations, and advice

The relevance of this nationally designated Area of Outstanding Natural Beauty to this consultation is set out in Annex A to this response. Annex B lists the organisations that make up the Cranborne Chase AONB Partnership Board.

The Local Authority partners have formally adopted the Cranborne Chase and West Wiltshire Downs AONB Management Plan 2014 – 2019. It is accessible on our website at <http://www.ccwvdaonb.org.uk/publications/aonb-management-plan/>. The Plan is a material planning matter.

This consultation response has been prepared under delegated authority.

I read that the review has been prompted by comments made by the Inspector who examined the North Dorset Local Plan Part 1. It has been informed by relatively recent assessments of housing need and employment land.

From an AONB perspective the Review should apply the great weight to conserving landscape and scenic beauty in the AONBs afforded by paragraph 115 of the NPPF. I read on 9th January 2018 the Under Secretary of State for Housing, Communities, and Local Government confirmed that ‘the Government are committed to retaining this protection, and it will not be weakened through our planning reforms’ (Hansard vol.

634). It is, therefore, quite clear that the Review can continue to give great weight to the purposes of AONB designation, namely conserving and enhancing natural beauty.

The way the assessments of housing figures and employment land have been juggled, some might even say manipulated, in recent times is remarkably reminiscent of the discredited 'predict and provide' approach of the 1980's. The supporting text in the Review Issues and Options Document indicates that North Dorset has special and particular characteristics. They indicate that standard methods of assessment should not apply to what is not a standard area. It appears that previously the Council had undertaken an appropriately rigorous assessment of the needs of the District taking into account the local situation. With the emphasis from Government being on local decision making it seems somewhat strange that standardised methodologies that do not necessarily relate to a particular locality should be imposed from outside. The AONB is, therefore, of the view that locally derived assessments of housing need and employment land are more appropriate.

I also read that the Spatial approach to the Review will retain the structure of the Local Plan Part 1, with the possible exception of additional development at Stalbridge. The assessment process that flows from that basic approach is to consider whether there are any additional Greenfield sites adjacent to the existing four main towns that could be developed for housing or employment. This seems to be a very limited and uninspired approach, and effectively restricts the discussion of the means of providing housing and employment opportunities in North Dorset to those limited areas adjacent to the four towns. There is also the massive assumption that the four towns are, and will continue to be, economically vibrant and capable of expansion. From the dispassionate position of the AONB it appears that assumption of continuing vitality of the four towns cannot be assumed.

For example:

Blandford is closely constrained by the two Areas of Outstanding Natural Beauty and the flood plain of the River Stour. The loss of the railway has decreased its strategic position, and the roads serving it, whatever their categorisation, are less than able to cope with strategic levels of traffic. The recent loss of the Council offices and the associated services further decreases the strategic significance of Blandford.

Shaftesbury is constrained by its exposed nature on an elevated ridge that is intervisible with the AONB, and close to it. There are further topographical complications with the land immediately to the west, north and east, as well as the additional complication of land to the east being in Wiltshire. Land on the southern side is particularly sensitive for its water catchment properties and there are complexities with the A350 corridor.

Sturminster Newton is located in the Blackmore Vale and is separated from strategic routes. Previously it had significance because of its connection by the railway and the importance of its regional market. Now those have gone it appears that it will not regain a significant regional position.

In contrast, however, **Gillingham** is linked to London and the West by its railway and is located a short distance from the A303, which is being promoted by Government as a new expressway. It appears, therefore, that the centre of gravity of the District is moving northwards to Gillingham and one option would be to focus new development on and around Gillingham. An alternative option that does not appear to have been considered at any stage is the creation of a new village or town, associated with

strategic routes and facilities. This omission is a little surprising as that approach has been followed in West Dorset with the promotion and development of Poundbury over the past decades.

The Review document rightly emphasises the environmental attributes of the District. One way of conserving those attributes would be to redevelop the developed areas to a higher density. The option of urban redevelopment, which has the added advantage of improving the quality of dwellings, does not appear to have been considered as a strategic option. With a town like Blandford, for example, that is tightly constrained such an approach may be one of the few realistic courses of action.

The AONB does, therefore, **advise** that the strategic approach to the Local Plan Review should be reassessed to consider explicitly a wider range of strategic and spatial options, such as those identified.

Reference is made in the document to Neighbourhood Planning. I can confirm that this AONB has been engaged with the Neighbourhood Plan processes at Fontmell Magna, Iwerne Minster, Pimperne, Blandford Plus, and Bourton. It has recently been advised of the existence of the Gillingham Neighbourhood Plan.

Mention is made in the document about the need for a five year housing supply. What is not clear is whether sites that have been granted planning permission, but have not yet commenced building or been built out, are included in those calculations. To an observer it appears that a number of the towns, for example Blandford and Shaftesbury, have significant numbers of houses approved but development has not yet started on site. It does, therefore, seem surprising that there is a perception that insufficient houses are being provided.

In addition to significant concerns about the overall approach to the Local Plan Review, this AONB is very concerned that the only approach to housing land at **Blandford** is the 'donut' of sites around the circumference of the Town. Those sites were considered, in lesser or greater detail, in previous Plan Reviews. To bring them forward again seems to indicate a softening of criteria, particularly in relation to the existing environment and the character and amenities of the neighbourhood. The Constraints Plan indicates that the only realistic area for additional development that builds, quite literally, on existing communities, and hence reinforces and provides them with additional facilities, is to the south of Blandford. Whilst there are potential complications with the A350 corridor such development could facilitate the construction of the Charlton Marshall and Spetisbury bypass. That could also facilitate the development of housing and employment opportunities that are not severed from existing communities and are not divided by increasingly busy roads.

This AONB, for reasons set out many times previously, objects to further development to the north and north east on the outside of the bypass.

In relation to the **A350** corridor south of Blandford this AONB retains its **support** for the bypass concept on the western side of the existing road. The AONB would **oppose** any alternative route on the eastern side of the Stour Valley as that would impinge on the AONB and introduce significant volumes of traffic to the tranquil eastern side of the Stour Valley.

The document rightly indicates that **Shaftesbury** is also significantly constrained. Whilst there is a duty to cooperate between authorities, the land to the east, in Wiltshire, is closely associated with this AONB and much of it falls steeply to the two

valleys that run eastwards. There is minimal land on the north western edge of the town that could be practically developed owing to the topography, AONB, cultural, and wildlife constraints. Potential development of the Town seems, however, to be bound up with the A350 corridor. In recent years there have been considerable concerns expressed locally about the current road effectively splitting modern development on the eastern side of the town from the town centre and all of the facilities there. Recent proposals have included potential development activities to the east of the reserved line for an eastern Shaftesbury Bypass. That indicates that an eastern bypass would do little by way of effective containment of the town. The continued reservation of that bypass on the eastern side would, of course, sterilise what little land there is remaining there that could be used for housing. An alternative western route could also provide a better link to Gillingham and a route that avoids the steep and twisty A350 running down Hart Hill. This AONB does, therefore, **not support** the retention of an eastern A350 bypass route.

This AONB **welcomes** the opportunity to contribute to the formulation of the issues and options North Dorset Local Plan Review. It does, however, question the fundamental approach to the spatial planning of the District. Whilst the current Spatial Strategy facilitates infill development in the larger villages the Review appears to encourage, possibly with softer criteria, sites around the four main towns already considered, and rejected, in earlier Local Plan processes. The AONB **commends** a more radical approach and identifies some options. This AONB is **very concerned** that without taking a more radical approach the AONB will suffer significant harm and, potentially, two of the four key towns will become less sustainable.

I hope these comments are helpful to you and the AONB would, of course, be happy to discuss any of the points raised.

Yours sincerely

RICHARD BURDEN

Richard Burden BSc DipCons MSc FLI PPLI
Landscape and Planning Advisor [REDACTED]

For and on behalf of the CCWWD AONB Partnership

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Encs: Annex A and Annex B

Annex A

The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital. This AONB's Management Plan is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' Objectives and Policies for this nationally important area. The national Planning Practice Guidance [Natural Environment paragraph 004] confirms that the AONB and its Management Plan are material considerations in planning.

The National Planning Policy Framework states (paragraph 109) that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes which include AONBs. Furthermore it should be recognised that the 'presumption in favour of sustainable development' does not automatically apply within AONBs, as confirmed by paragraph 14 footnote 9, due to other policies relating to AONBs elsewhere within the Framework. It also states (paragraph 115) that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in these areas.

Section 85 of the Countryside and Rights of Way Act 2000 requires that holders of public office, councillors and the like have 'a duty of regard' to the purposes of AONB designation. National and local Government are thereby clearly directed to have regard for the purposes of AONB designation when carrying out their functions that affect land in or near an AONB. National and local Government, and their departments, therefore have to be able to demonstrate that they have considered the purposes of AONBs in their decision making on any proposed legislative, strategy, policy or implementation matters.

Cranborne Chase is the 6th largest of the nation's Areas of Outstanding Natural Beauty and some 95% of the land in this AONB is under agricultural or woodland management. The combination of farming and forestry activities has contributed to the landscape character of this valued part of the nation. It is, nevertheless, vital that the needs of a viable farming industry are balanced against the need for sensitive environmental management in landscapes of national importance.



Cranborne Chase

Area of Outstanding Natural Beauty

**The Cranborne Chase
Area of Outstanding Natural Beauty Partnership Board
is made up of the following Partner Organisations**

Unitary, County, and District Council Membership (1 Member and 1 Officer Representative each)

- Wiltshire Council
- Dorset County Council
- Hampshire County Council
- Somerset County Council
- East Dorset District Council
- North Dorset District Council
- New Forest District Council
- Mendip District Council
- South Somerset District Council

Other Organisations

- Natural England (2 Representatives)
- Historic England (1 Representative)
- Campaign to Protect Rural England (1 Representative)
- Forestry Commission (1 Representative)
- The Country Land and Business Association (1 Representative)
- National Farmers Union (2 representatives)
- Community Representatives from the Wiltshire and Dorset Associations of Town & Parish Councils (ATPCs) (2 Representatives)

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Area of Outstanding Natural Beauty**



[Redacted]

Edward Gerry
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Dorset Councils Partnership serving:
North Dorset District Council, West Dorset District Council
and Weymouth & Portland Borough Council

By Email planningpolicy@north-dorset.gov.uk

22 January 2018

Dear Ed

North Dorset Local Plan Review; Issues and Options

You will see that I have already responded to your consultation in my letter to you dated 10th January. Please accept my additional comments below.

With regard to the potential sites shown on the map on page 36 of the LPP2, this AONB Partnership **objects** to development to the north and east of the bypass, in this AONB or its setting.

The Partnership is **concerned** about sites A, B, and C. D and parts of E would be in the setting of this AONB.

On the other side of the town, K and J appear to be in this AONB, and would be particularly exposed developments seriously detracting from the character of the AONB and obviously not complying with the 'conserving and enhancing natural beauty' criteria.

Yours sincerely

[Redacted]

Richard Burden BSc DipCons MSc FLI PPLI
Landscape and Planning Advisor [Redacted]

For and on behalf of the CCWWD AONB Partnership

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