



Comments on the Chickerell Neighbourhood Plan – Pre-Submission Draft Dec 2019, on behalf of the Owners of Aldwickbury (landowners) and C G Fry and Son Limited (prospective developers of the Land west of Southill site)

Principal accompanying documents

It is noted that a significant number of these documents are very dated. The Draft Neighbourhood Plan (NP) should be based on a more up to date and comprehensive evidence base.

Foreword

1 It is stated in the Forward that:

Chickerell has experienced a lot of housing growth since the 1970s, and the last Local Plan allocated some large sites which have yet to be built out. So there is no need for our plan to suggest any greenfield sites for development.

2 Bearing in mind one of the background papers to this draft plan is the West Dorset, Weymouth & Portland Local Plan Review (LPR) Background Paper Preferred Options Consultation – Chickerell, it is surprising that the NP does not embrace the Preferred Options allocation CHIC4 in the draft. This is particularly so taking into account the fact that the Preferred Options Consultation was published in August 2018, with a view to that Plan being adopted in 2020, covering the period to 2036, with the site being delivered in 2026. Dorset Council has a continuing need to provide housing sites, as it prepares the Dorset Local Plan (DLP) and, with this site having few constraints, it could be delivered within a short timeframe. Chickerell is a popular area for house purchase and the NP plan needs to supply more sites rather than relying on allocations in the last local plan.

3 It was considered that housing need warranted the site in the original local plan timeframe. Since then that Plan has been abandoned, as a result of local government reorganisation, to be replaced by the new DLP. The timeframe for the new Plan is adoption in Q2 2023 and it will look ahead until at least 2038. Housing need in the area remains severe and the Council needs to provide significant amounts of housing land in the local plan time period.

4 At a recent appeal decision in Charminster in West Dorset, both parties to the appeal accepted that the Council did not have a five year housing land supply (5YHLS) but differed on the actual supply figure ranging from 3.99 appellant to 4.88 Council. Taking all matters into account the Inspector reasoned the figure was greater than 4.22 years but less than 4.88 years.

5 Going forward, for West Dorset and Weymouth & Portland the housing requirement is 780 dwellings per annum - 11,700 over the 15 year plan period. (Based upon the National



Planning Policy Framework (NPPF) standard methodology using 2014 ONS household projections).

6 As a result, we consider that in consultation with Dorset Council, the Town Council should consider allocating Land West of Southill for housing in the Neighbourhood Plan. This would help speed up housing delivery, which would both assist in meeting pressing housing needs and improving the Dorset Council’s 5YHLS .

1 Introduction

7 Paragraph 1.1 starts:

In 2016, Chickerell Town Council decided our area required the protection of a Neighbourhood Plan.

8 Paragraph 1.4 acknowledges that the NP (amongst other things) has to have regard to national planning policies e.g. the NPPF

9 However Para 11 of the NPPF (Feb 2019) states that:

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should ...

10 Paragraph: 003 Reference ID: 41-003-20190509 of Planning Practice Guidance states:

Neighbourhood planning provides the 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 need and make sense for local people.

11 The NP should not be seeking the “protection” of the area, as this strongly suggests the NP is a restrictive tool. It would be far more preferable for the NP to describe itself as a positive tool to manage the growth and pressures that Chickerell faces. It should allocate this site for development to help meet the Council’s wider housing needs.

12 The last sentence of paragraph 1.5 states:

WDDC had identified possible Chickerell sites in their 2018 Preferred Options Consultation

13 Para 1.6 states:

The policies in this Chickerell Neighbourhood Plan have been aligned with the policies emerging from that review.

14 The Preferred Options Consultation put forward Policy CHIC4, which is on pages 27 and 28 of the NPs background paper on Chickerell, for the Preferred Options Consultation



Version. This suggests allocating the Land West of Southill as a Preferred Option in the Local Plan Review, subject to criteria, one of which is:

Development should not take place on site until after 2026

15 Para 1.9 of the NP states that

The 2006 and 2015 Local Plans allocated significant sites in Chickerell (in the 'Village') for over 1,100 new dwellings.....As such this strategic level of growth should more than meet any anticipated local need for housing development.

16 Para 1.10 states:

The only additional area of development proposed in this plan is in relation to land immediately to the rear of Montevideo House.

17 In the light of the above statements, para 1.6 does not appear to ring true. Land West of Southill is not allocated in the NP and we see no reason why it should not be, bearing in mind that the NP is likely to be 'made' well before the Dorset Local Plan is 'adopted'. This would enable much-needed housing to be delivered in an earlier timeframe. The Preferred Options Plan had delivery in the mid 20's, which is much sooner than the NP, which contemplates the end of the Plan period, taking us to the mid 30's.

18 Para 1.12 states that:

With a Neighbourhood Plan in place, Chickerell Town Council will be given 25% of the money collected from developers through the Community Infrastructure Levy. This money, together with any S106 contributions provided to the Town Council, can be spent on improving local infrastructure and facilities to benefit both existing and future residents.

19 Allocating Land West of Southill for residential development and a care home in the NP would therefore bring significant benefits to the existing local community.

2 Context

20 Para 2.5 states:

Only small parts of the Neighbourhood Plan area lie within the Dorset AONBHowever, the countryside is generally picturesque and due to the views, much of the underdeveloped western part of the plan area would be considered to form the setting of the AONB.

21 If AONB setting is to be highlighted as above, the area needs to be defined in the Plan and any implications for development in this area specified. If restrictions are suggested in this area to comply with the Basic Conditions tests for NPs, it must provide clear reasoning why any additional restrictions are needed.

22 2.15 states that:

The population profile of Chickerell has a much higher number of older residents when compared to the England average.



23 The paragraph goes onto to state that Chickerell does not currently have some of the facilities that you would expect of a population of its size.

24 Allocating the Land at West at Southill in the NP in addition to housing, could deliver a care home to cater for the elderly population, community benefits and CIL or S106 contributions.

25 Para 2.16 states:

There was general acceptance that Chickerell is an appropriate place for development, and some growth is inevitable, but that further new housing allocations should be delayed until current extant allocations are nearing completion.

26 It is noted that there is a general acceptance, as a result of consultation on the NP that Chickerell is an appropriate place for development, and some growth is inevitable, but further new housing allocations should be delayed until current extant allocations are nearing completion. However the NP does not even allocate this site.

27 Bearing in mind the NP period is up to 2036 and the Council's requirement to prove a deliverable supply of housing land to address the area's housing need, the NP should not be silent on allocating additional land for housing development. Such allocations could be justified in the early years of the Plan period.

3 Vision and Objectives

28 Para 3.1 sets out the Plan's vision. It talks of:

- increased protection for landscape and wildlife
- continued separate identity from Weymouth
- encouragement to business
- need for an increase in local facilities

29 Despite new housing being mentioned in the NP's objectives, as a way of achieving the vision, surely housing warrants a mention in the vision too.

30 When housing is mentioned in the objectives, it is fairly vague, despite having the objective:

To meet the housing needs of a diverse range of people wishing to live in the area.

31 We believe the NP should go further with its vision and mention facilitating housing growth and flesh this out in its objectives to demonstrate how this will be achieved in the NP, so as to help meet the housing needs of West Dorset and Weymouth & Portland and tackle the current lack of 5YHLS.



4 The Village – Neighbourhood Plan Policies

32 On Map 3 Page 11, it is noted that there is only one site allocation on this plan cross-hatched red (Montevideo House), which is also in a defined wildlife corridor, despite Policy CNP 10, which gives special protection to important wildlife corridors.

33 Para 4.15 states that:

there is significant growth planned for the Parish, as allocated through the Local Plan, which means this Neighbourhood Plan does not need to allocate further housing sites to meet local needs.

34 **We would challenge this statement for the following reasons:**

a. **The Local Plan was adopted in 2015 with a plan period which extends to 2031. The Plan states that:**

It is likely to be reviewed well before the end of this plan period, in whole or in part, to ensure that there are sufficient developable sites available for future needs, It may also need to be updated to respond to unforeseen circumstances.

b. **A review of the local plan did commence in 2018.**

c **The review's Preferred Options Consultation Version for Chickerell dated 2018 showed Land West of Southill as a preferred option taking account of recent housing need and supply issues. This is a background paper to the NP. The main Consultation document covering the whole plan area is not a background paper and should be. In the housing chapter to this latter document it states that:**

In April 2018 this [new standard] methodology showed a need for 794 new homes per year in the local plan review area, not significantly above the figure of 775 new homes per year in the current local plan.

35 Notwithstanding, it then put forward a strategic approach as follows:

A continuing supply of housing land is needed to help meet the changing demographic and social needs of the area, and to help reduce the need to travel and promote economic growth and social inclusion. The type, size and mix of housing will be expected to reflect local needs as far as possible and result in balanced communities.

Although the total projected need for affordable housing is not expected to be met in the plan review period, opportunities will be taken to secure affordable homes to meet local needs. This will include ensuring all new open market housing sites, above a certain size, make a contribution (through providing new affordable homes or, where this is not possible, making a financial contribution), and through a range of flexible policies that encourage affordable housing to come forward where there are suitable opportunities

36 Policy CNP3 on page 15 does allocate a site at Montevideo House which is a park home site. The justification for this allocation appears to be to improve the setting of the listed Montevideo House. The allocation is shown on Map 3 and it would appear to be in the area proposed as a wildlife corridor. Land west of Southill is not allocated.



Wildlife Corridor and Green Gap

37 Immediately after Policy CNP 3 there is a section on the Wildlife Corridor and Green Gap adjoining the village. Map 5 defines the proposed Chickerell Wildlife Corridor. As well as including the CNP 3 allocation at para 4.21. It also includes the 9 hole golf course to the west of Weymouth Football Ground but not the ground itself. This para states that the Golf Course is:

a valuable part of our proposed wildlife corridor and should be retained long term as an open green space and leisure facility

38 The landowners of the golf course object to the supporting text to this policy making reference to the retention of it in the long term as an open green space and leisure facility. As well as the evidence base being lacking to support the designation of Wildlife Corridors, there is no robust evidence base which would support the golf course being retained long term as open green space and leisure facility.

39 Policy CNP 4 regarding the Chickerell Wildlife Corridor states:

The undeveloped wildlife corridor (as shown on Map 5) forms an important network of multifunctional green space capable of delivering a wide range of environmental benefits. Development that would detract from this function will be resisted.

40 The landowners also object to Policy CNP 4 and do not consider that the Plan's evidence base has anything to justify either the retention of the golf course long term as an open green space and leisure facility or to warrant the designation of wildlife corridors and so protecting land within them from development.

10 Land adjoining Wessex Stadium roundabout and Southill.

41 Para 10.2 refers to an outline consent from 2009 for B1 employment units to the north of the Police Headquarters. It notes this consent has lapsed but goes on to state:

some employment might still be appropriate on this site, as it is near the Granby Industrial Estate.

42 The land owners and CG Fry object to this statement remaining in the Plan for three reasons:

- 1. Marketing of the site following the outline consent proved to be unsuccessful.**
- 2. West Dorset and Weymouth & Portland Council, in its review of the 2015 Local Plan, concluded in its Preferred Option Consultation document that residential development was the best proposed use of this site.**
- 3. There is nothing in the NP's evidence base which justifies employment use of this land.**

43 Point 2 is actually recognised in the NP in para 10.4. This states that:

Although not actively being promoted through this NP, in the absence of identified local need, it is accepted this site could be developed subject to suitable landscaping.



44 It goes on to state that if the site is allocated for strategic growth the ridgeline to the north would need to remain undeveloped, there would need to be strategic landscaping, there would need to be connections to other parts of Chickerell and then suggests linkages to existing facilities. This emphasises the site's sustainable location for residential development. The paragraph goes on to state:

the estate's design should include a wildlife corridor linking from the existing wildlife corridor identified to the south (Policy CNP 4) to the rural North.

45 Para 10.5 states as follows:

Given the amount of housing from the previous Local Plan that has yet to be built within the Parish, it would seem sensible to phase building of any further development towards the end of the next Local Plan period. This would allow Chickerell to assimilate the significant growth already approved, which is not expected to be completed until 2030. Much needed infrastructure is to be provided by existing Chickerell allocations and there is a risk that allocating a further site in the same vicinity would risk slowing delivery of infrastructure. Some 58% of responses to the Neighbourhood Plan questionnaire agreed the site to be suitable, but given the significant sites already allocated in the near vicinity 88% of respondents thought this development should await completion of the majority of the existing allocated Chickerell sites.

46 **Whilst we understand the NP taking account of the opinions expressed in a questionnaire the conclusions of this paragraph are questionable for the following reasons:**

1. **Progress is being made on the build-out of sites allocated in the 2015 Local Plan in the Chickerell area. CG Fry are on site on CHIC 2 and Persimmon are in for planning on their tranche.**
2. **Allocating Land west of Southill in either in the NP does not justify a reference to build-out being *towards the end of the next Local Plan period*. The DLP timescale is 2023 – 2038. The second half of the 30s is far too long to put this site on hold particularly bearing in mind current local housing need and lack of five year housing land supply.**
3. **We see no reason why the delivery of infrastructure associated with the previous allocations would be slowed as a result of an allocation. On the contrary, infrastructure payments from this site, whether S106 or CIL, could supplement existing contributions which the Town council would benefit from.**
4. **The NP assumes that the allocation of Land west of Southill would be a strategic allocation, which the DLP should address. However with the long preparation time for the DLP, currently programmed for adoption Q2 2023, we consider that it would be far more appropriate to consider the allocation of this site in the NP. There is precedent for this with Dorset Council recently supporting the allocation of 400 dwellings at the recent Blandford+ NP Examination, which was also endorsed by the Examiner. The Council justified this based on local housing need and poor 5YHLS. A similar argument could be made to justify this site coming forward earlier in the Chickerell NP, rather than the DLP.**



11 The Rural North

47 Policy CNP 10 covers The Landscape Ridge north of Chickerell including Coldharbour. This states that:

Development on or immediately below the ridgeline running east-west from Chickerell Hill (north of Courage Way) to Coldharbour (junction with Harbour Hill) as shown on Map 8 should continue to be protected as Land of Local Landscape Importance. Opportunities to enhance the biodiversity and informal recreational use of this area will be supported.

48 **We do not object in principle to this protection, however we do object to the area defined to be covered in Map 8. We consider that the designation extends too far to the south, in the south eastern corner of the designation. The designation extends approximately to the line of Hammond Avenue, whereas we consider it should only extend as far south as Sutcliffe Avenue, the next street to the north.**

49 When submitting background evidence as part of the consultation on the Local Plan Review, in respect of the Land west of Southill, Savills submitted a Landscape and Visual Assessment, which outlined the limits of development on the northern part of the site, and an illustrative masterplan submitted as part of that consultation adhered to the limit suggested around Sutcliffe Avenue. **The effect of having the more southerly boundary would be to potentially exclude approximately 32 much needed dwellings. Once again we not consider that the NP has a sufficiently up to date evidence base to justify this designation.**

50 **Section 12 deals with Design Principles which we generally support**, including the provision of street trees. CG Fry, the potential developer of the site, already have an excellent track record of well-designed housing developments in the Chickerell area and elsewhere.

51 Para 12.8 onwards deals with Planning for Wildlife and Policy CNP 12 deals with Enhancing Biodiversity. **We have no objection to these policies** and indeed Stage 1 and Stage 2 ecological studies have been undertaken on the site and do not reveal any significant issues, whilst recommending numerous mitigation measures.

Conclusion

As currently drafted, we conclude that the NP does not meet the Basic Conditions for Neighbourhood Plans¹ in that it fails to properly take into account national planning policy in the form of the NPPF and NPG, particularly in respect of ensuring a proper supply of housing. Not doing so it fails to deliver sustainable development and is at odds with the direction of travel for strategic policies being formulated for the Dorset Local Plan.

¹The basic conditions for neighbourhood plans are that they must: have regard to national policy; • contribute to the achievement of sustainable development; • be in general conformity with the strategic policies in the development plan for the local area; and • be compatible with EU obligations.