

Shaftesbury Neighbourhood Plan - Submission Plan –Summary of Representations

Shaftesbury Town Council submitted the Shaftesbury Neighbourhood Plan (2019–2031) to Dorset Council for independent examination in January 2020. People were given six weeks from 7 February to 20 March 2020 to comment on the content of the plan or how it was produced. At the close of the public consultation 15 representations were received. Consultation was extended by a further week to allow for the disruption being caused by the Covid-19 crisis. As a result, a further 4 representations were accepted, and further additions were submitted with respect to representation SY10.

The following table is a summary of the representations received, as required by Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendums) Regulations 2012. Copies of the original, full representations as they were submitted to Dorset Council are available online from:

www.dorsetcouncil.gov.uk/shaftesbury-neighbourhood-plan

Rep ID	Respondent	Summary
SY1	Atlas Planning Group (on behalf of Ms Hellier)	<p>Rolt Millennium Green has been put forward as a designated Local Green Space under Policy SFG11. However, although the boundary follows that of North Dorset District Wide Plan 2003, it includes a parcel of land, which does not contribute to the Green or meets the objectives of Policy SFG11. Further to this, the land in question is in private ownership – it is not owned by the Rolt Millennium Green Trust.</p> <p>No coherent reason is given for the inclusion of the whole of the land within the proposed LGS, indeed the only justification which is provided is for the community garden. There is no obvious factor such as landownership, public access, or visual character which seems to have been used as a basis for establishing the boundary.</p> <p>Indeed, the business manager for and on behalf of Shaftesbury Town Council has stated in an email to Ms Hellier dated 3 February 2020 that <i>“We followed the North Dorset District Council IOWA (important Open Wood Area) boundary hence the boundary was drawn as it is shown on the above map and on page 43 of the draft Neighbourhood plan.”</i> (Appendix A).</p> <p>We therefore object to the designation’s boundary for Rolt Millennium Green, as for the reasons above, this would be contrary to the requirements of NPPF 100. The proposed area for designation (whilst valued to some degree) is not demonstrably special and does not hold a particular local significance. The land is in private ownership and is not a green space. Rather, it is a parcel of hard standing and is occupied by a garage. Accordingly, the NP does not meet the first of the basic requirements. We therefore respectfully request that the boundary is amended and Ms Hellier’s site is removed from future versions of the Neighbourhood Plan.</p> <p>In addition, we contend that the proposed NP would also fail to accord with the second and third basic requirement, as the overly restrictive approach to development proposals within the proposed LGS would be contrary to the overarching objective of achieving sustainable development.</p>

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

SY2	Blandford Forum Town Council	<p>The Town Council supports the efforts of Shaftesbury Town Council to establish the Neighbourhood Plan. The Town Council fully supports the policies and feels that if they are implemented, they will have a positive impact to Shaftesbury and the northern area of Dorset.</p>
SY3	Southern Gas Network	<p>Observation of the impact of the projected development to the SGN gas infrastructure. Plus highlight other relevant information.</p> <p><u>NETWORK OVERVIEW</u></p> <p>Shaftesbury is indirectly supplied from the Medium Pressure (MP) tier. Three District Governors reduce the MP to Low Pressure (LP) to feed gas to the whole of the town.</p> <p>The three sites allocated for housing are all likely to connect to the LP network. The indirect impact to the MP from the housing developments is not likely to trigger any type of reinforcement on the MP. However, reinforcement of the existing LP network may be necessary to support development, dependant on the final point of connection to SGN’s network.</p> <p>Please note, SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a ‘first come, first served basis’.</p> <p><u>STATUTORY OBLIGATIONS</u></p> <p>Where required, SGN will look to manage the provision of any off site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for the IPMP networks, and will only become clear once a developer’s request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN’s existing mains system, but may also include the installation of above ground apparatus involving land purchase.</p> <p>As this is a high level assessment and response, the information provided is indicative only and should be use as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the development of our gas network arise from the Gas Act 1986 (as amended).</p> <p>SGN would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.</p> <p>As SGN is the owner and operator of significant gas infrastructure within the Shaftesbury area and due to the nature of our licence holder obligations;</p>

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<ul style="list-style-type: none"> • Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer. • Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process.
SY4	Caleb Fulford	<p>The Shaftesbury Neighbourhood plan is a work of Art! Very well put together, worthy of a top corporation Distribution Pamphlet. It is clear some very good work has gone in to this document. Some of the detail is outstanding including the explanation of the local Green Sand Stone.</p> <p>Only one criticism of the plan is the presumption that no development shall take place outside of the settlement boundary. As the only spaces within the very tight boundary are the school playing fields and two parks this effectively blocks any development in Shaftesbury, which is country to government and local authority policy. Either the boundary which was arbitrarily drawn on a map years ago needs re drawing, or new housing outside the boundary should be considered on a case by case basis looking at the merits of each case, including most importantly if any developments are built using traditional materials and are in keeping with their surroundings.</p> <p>The problem in the past has been poorly designed cheaply built, out of character dwellings built in the town. We need to build housing that in 100 years people will want to put preservation orders on, not pull down. We have an opportunity to keep Shaftesbury</p> <p>With an expanding population thankfully people want to live in Shaftesbury and we need to keep a vibrant town. We need diversity and environmental sustainable housing that improve the visual amenities. In short we need development and more housing and we have to embrace this, although I know a lot of people who already have nice houses in the town do not want this.</p>
SY5	National Trust	<p>The Trust owns Fontmell and Melbury Downs in the Cranborne Chase Area of Outstanding Natural Beauty (AONB). This land was bought in memory of Thomas Hardy, to protect the landscape in which his novels are set. There are excellent outward views from the Downs, including towards Shaftesbury from high points such as Melbury Beacon and Win Green. The Downs are also of considerable importance for their ecology and archaeology, and they are enjoyed by increasing numbers of walkers and visitors.</p> <p>In response to the Neighbourhood Plan, we would like to make the following comments:</p> <ul style="list-style-type: none"> • We are broadly supportive of the Plan, including its emphasis on landscape and topography, visual amenities, ecology/biodiversity, heritage, local character and design. • It is noted that the Plan does not allocate any further land for housing (above and beyond adopted Local Plan policy) and does not alter the settlement boundary of the town; and defers such matters to the

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>emerging Dorset Local Plan.</p> <ul style="list-style-type: none"> Given that we previously raised concerns (to North Dorset DC) over possible expansion of the town south of the A30 Salisbury Road (which could lead to further landscape and visual impacts from the perspective of the AONB) we agree with the approach of not allocating further development land through the Neighbourhood Plan. Linked to above, we note and support the Policy SFG12 (page 46) which identifies Win Green (I) and Melbury Beacon (J) as notable places in the surrounding countryside with views of Shaftesbury, as well as the associated photos and text in the appendices. Finally, attached are our own viewshed (zone of theoretical visibility) maps, which are based on a person viewing from Win Green and Melbury Hill/Beacon respectively, and show the extent of land where buildings of 5 metres in height or above would be visible.
SY6	Motcombe Parish Council	<p>Motcombe Parish Council has read the Plan and generally support the contents. There are elements that would affect the residents of Motcombe Parish and our comments to support those elements are shown below.</p> <p>1.6: is it realistic to have a population plateau and no new development as early as 2026. The future impact on Education is of particular concern.</p> <p>2.2 Parking provision has changed since the map was drawn. Consideration to the impact of insufficient parking on residents of surrounding villages needs to be considered in line with planned reductions in bus services. The success of Shaftesbury businesses depends not just on residents and tourism but on local users.</p> <p>3.1 P28: the decision not to consult on attitudes to future housing means there is no evidence to challenge pressure for more building in the future. The level of response to the Plan could also mitigate against future opposition.</p> <p>3.1 P28: Motcombe would also like to see mention of the need for drainage to be considered in relation to this village as it experiences considerable run off from Shaftesbury.</p> <p>3.5 P36: while supporting the idea of traffic limitation in the Town Centre, the impact on traffic flow around the Town needs consideration; the proposed bypass could quickly reach saturation. However, we support the idea of a bypass.</p> <p>6.1 P70: Motcombe residents have access to Leisure facilities at Port Regis School and three miles away in Gillingham, however any new provision in Shaftesbury could also be used and this should be taken into consideration when planning both the facilities and parking spaces.</p> <p>6.2 P79: Parking at Abbey View surgery is already difficult and further expansion without more parking spaces is not viable.</p> <p>App H: the change of Academy Trust which moved Primary (one school) and Secondary Education to Sherborne Academy Trust happened after the Plan was completed. The impact of this change is unknown but the current and</p>

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>future Primary School numbers need to be considered in relation to children attending neighbouring Schools. Motcombe currently has 70 pupils who reside in Shaftesbury and it is questionable whether these numbers could be accommodated in the current Shaftesbury set up.</p>
SY7	Historic England	<p>There are no issues associated with the Plan upon which we wish to comment.</p>
SY8	Wessex Water	<p>Wessex Water has existing apparatus passing through some of the designated Local Green Spaces. The Policy prohibits development taking place within these spaces “if it would harm their green character and the reason for their designation”. This policy must not constrain maintenance or improvement programmes, which are critical for the efficient and safe operation of Wessex Water services.</p> <p>Additionally, some areas of Shaftesbury are within a Supply Source Protection Zone 1. Therefore, the use of soakaways here must be with caution and appropriate sustainable drainage systems implemented, to ensure the protection and sustainability of this zone.</p>
SY9	Cranborne Chase AONB	<p>The Index of Policies on page 9 is particularly helpful. I note, nevertheless, that there do not appear to be specific policies on renewable energy or affordable housing. I found later that these are covered, to an extent, in other policies. It may, however, be beneficial to draw out those aspects into separate policies as they are particularly relevant at the current time and appear to be important for the foreseeable future.</p> <p>Page 12 refers to the Neighbourhood Plan area and I have to admit I had not fully appreciated that the settlement boundary actually extends outside of the Neighbourhood Plan area. It seems that locations, particularly on the southern side, are more relevant to Shaftesbury than the adjoining parish. It might, therefore, have been prudent to have either a larger Neighbourhood Plan area or to explicitly engage in a liaison and cooperation arrangement with the adjoining parishes.</p> <p>I find it a little surprising that on page 14 the only reference to affordable housing is in relation to sites outside of the development boundary and because of that there appears to be no specific policy on affordable housing at all. The perception of the AONB is that the lack of affordable housing in and around this AONB is the principle housing issue, particularly when developers seem quite keen to come forward with substantial developments of four bed roomed houses on the open market.</p> <p>The summary of policies relating to Climate Change on page 16 is particularly helpful. Nevertheless it is noticeable, at this time when your Council has declared a climate emergency, there is no reference to the provision of technology on new housing and new employment buildings to capture and utilise renewable energy. Covering that issue could build on our AONB Management Plan policy PT 21. Shaftesbury is very much part of the setting of this AONB and in the same way that reference is made later in the document to protecting the dark night skies of the AONB providing policy guidance on renewable energy now would seem to be providing exactly one of the strands of guidance that</p>

		<p>Neighbourhood Plans are there to do.</p> <p>A small point in ensuring that policies are mutually supported; I would suggest that policy SFTC3 on page 23 also takes account of any street lighting being dark night sky compliant.</p> <p>I note that on page 26 it is made quite clear that because Shaftesbury has already achieved the quota of dwellings in the adopted Local Plan no new allocations for housing or employment are being proposed.</p> <p>In relation to policy SFHE1, where an assessment of the social, economic and environmental impacts of proposed development outside of the settlement boundary is being promoted, I would strongly advise that this policy should be modified to indicate that such an assessment should not only be clear but also independent.</p> <p>The AONB is well aware that the Shaftesbury community are concerned about the slow or lack of delivery of public benefits that were promised with previous development schemes. The AONB does, therefore, have considerable sympathy with the feelings behind policy SFHE2. The policy does, however, seem just a bit overly cautious about putting the emphasis on the provision of affordable housing. It could, for example, say that affordable dwellings would be the only additional housing development that would be supported prior to the adoption of a new Dorset Local Plan. It could also pick up the guidance in NPPF paragraph 63 and apply the five dwellings threshold for the provision of affordable housing rather than ten.</p> <p>The concern about the tardiness surrounding delivery of public benefits from developments could also be more crisply worded to make it clear that the Neighbourhood Plan expects the Planning Authority to require developers to enter into binding legal agreements against specific timescales prior to the commencement of development so that the community is clear which benefits are to be provided at what points in time.</p> <p>Policy SFHE4 relates to safe guarding the route of an eastern bypass. Because the provision of a bypass on the eastern side has significant implications for this AONB relating to not just the connection points north and south of the town, but also to the route such a modified highway network would take, this AONB cannot support that policy. Furthermore the AONB is very aware of the high level objective within the adopted Local Plan to improve connectivity between Blandford Forum, Sturminster Newton, Shaftesbury and Gillingham as the major towns within the North Dorset area. I have proposed on a number of occasions that a major highway improvement should be considered between the four towns rather than simply an eastern link from Blandford to Shaftesbury. A more westerly route could provide a spur to Sturminster Newton whilst travelling on the western side of Shaftesbury, linking to Gillingham and progressing to the A303. In the context of the Neighbourhood Plan that would mean focusing on a bypass route to the west, rather than the east, of Shaftesbury. That approach would avoid the sensitive landscapes of this AONB in addition to linking the four main towns of North Dorset.</p> <p>Turning to section 4, Green Infrastructure, there seems to be a bit of a misunderstanding in connection with local green spaces, page 41. In NPPF paragraphs 99 – 101 is quite clear that it is not a requirement of Local Green Space</p>
--	--	---

		<p>designation for the land to be ‘not needed for development’. Furthermore the wording in the NPPF is clear that a site such as the public access area and viewpoint at Littledown that is being provided as part of the development can be identified as Local Green Space. That location is within this AONB and the AONB advises that it would be sensible to identify it as a LGS.</p> <p>The AONB particularly welcomes policy SFG12 which focuses on the slopes and views around and to and from Shaftesbury and the surrounding countryside. This policy relates to some important issues in relation to the special character of Shaftesbury and its relationship with this AONB. However there appear to be some typographic errors in the policy. The map reference in the first sentence of the policy does not appear to relate to any of the maps provided. It would also seem that the second sentence of the policy should read ‘any development <u>that</u> will <u>not</u> preserve’ is the intention of the policy. I also note that on page 45 in the third paragraph the (I) should in fact be (F). On page 47 there are two maps and a key. It would appear to me that the colouring on the central map is incorrect in relation to the area above the word ‘character’ as this is clearly the top end of a chalk river valley.</p> <p>On page 48 the map should, I suggest, indicate that the western sector of Littledown, where public access is being provided should be coloured as being sensitive to development, being a plateau edge location.</p> <p>The AONB, being an International Dark Sky Reserve, welcomes policy SFG14. The elevated position of Shaftesbury makes it particularly valuable as a star gazing location to gain the emotional, intellectual, recreational and tourism benefits and Shaftesbury should be dark night sky compliant. Whilst the policy as currently worded seeks to set that out I would, therefore, suggest that the second point of the policy is amended to read ‘Where lighting is considered necessary, it should be dark night sky compliant and its design should minimise its impact both on the amenity of the occupants of neighbouring properties and in terms of light spillage and glare’.</p> <p>The Design and Heritage section focuses largely on historical and architectural matters. The approach to character zones is seen as both instructive and helpful. The AONB notes that in the suite of policies aimed at providing clear direction on the appropriateness of designs and materials there does not appear to be any comment on roof lights. Roof lights have the capacity to contribute significantly to light pollution and hence impact adversely on dark night skies and the International Dark Sky Reserve designation. The AONB recommends policies could, therefore, include a reference to designs avoiding roof lights for the reasons just stated. Lantern style roof lights in flat roof structures also have significant capacity to contribute to light pollution. If it is felt that restricting these design elements is too prescriptive then it should be clear that such features can only be included in designs when they are fitted with integral blinds that can be operated at night to avoid light pollution.</p> <p>The AONB welcomes the proactive approach of the Neighbourhood Plan to the provision of projects, and projects HE1 and HE2 relating to affordable homes and a Community Land Trust are particularly welcomed. Project GI4, protection of our Dark Skies, is also seen as particularly positive and is likely to be part of this AONB’s year on year reduction of light pollution.</p>
--	--	--

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>The AONB is also impressed by Appendix F which comprises the Shaftesbury views audit, including not just views from Shaftesbury but also views of Shaftesbury itself from the surrounding countryside. The AONB is mindful that in a number of significant appeal reports relating to proposals in the North Dorset area views to and from key landscape features have been of some significance in influencing the appeal outcome.</p>
SY10	Karen Tippens	<p>Climate Change and Housing Policy</p> <p>There must be a distinct Planning Policy within the NHP for Climate Change and New Developments.</p> <p>Proposed Intention:- To accord with National Policy guidelines in relation to the effect of an new development on global warming</p> <p>Proposed Policy.</p> <p>All new developments within Shaftesbury shall seek to achieve a high standards of sustainability and in particular demonstrate in proposals how design, construction has sought to</p> <ol style="list-style-type: none"> 1. reduce the use of fossil fuels; 2. promote the efficient use of natural resources, 3. re-use and recycling of resources and the production of consumable of renewable energy 4. Adopt best practice in sustainable urban drainage. / Include a new over-arching stand alone policy specifically on climate change. <p>The justification for this is manifold (various reasons given, including declarations of the climate emergency and need to act now, and that the Local Plan adopted policies do not require such [sustainable energy] provisions)</p> <p>Settlement Boundary – SFHE1</p> <p>The policy still does not adequately protect Shaftesbury from opportunist developers who want to build outside the Shaftesbury Settlement Boundary; especially where it is evident that the housing development would clearly cause ‘harm’ to the intrinsic and historical setting Shaftesbury enjoys.</p> <p>There has always been extremely strong reaction against building outside the Settlement Boundary, especially regarding the Slopes. The statements made in the Shaftesbury Neighbourhood Plan regarding ‘not being able to refuse housing development’ outside the Settlement Boundary simply is not true.</p> <p>Intention:-</p> <p>To define and protect the Open Spaces which surround Shaftesbury in order to retain the open rural aspect of the town which is so much appreciated by the inhabitants and to enhance the Green Infrastructure...</p> <p>Policy:-</p>

		<p>Every effort shall be made to prevent any further housing development in the green spaces outside Shaftesbury’s Settlement Boundary. Every effort shall be made to ensure that these green spaces are preserved to retain the intrinsic character of Shaftesbury settlement.</p> <p>The field which constitute the area outside of Shaftesbury Settlement Boundary are classified as countryside for planning purpose. They provide Green Spaces between buildings and afford far-reaching views into the countryside and contribute significantly towards the rural character of Shaftesbury, which the community of Shaftesbury wishes to preserve. The protection of these green spaces and the wild life corridors between them, such as hedgerows, trees, bands and verges will also contribute to towards enhancement of the Green Infrastructure within the Shaftesbury NHP.</p> <p>Biodiversity</p> <p>In the door to door survey conducted in Jan 2015 by the former NHP group for Shaftesbury, the area and question which obtained the highest figures out of the whole survey was surrounding ‘protection of Fauna and Flora’ in Shaftesbury – Question 29.</p> <p>There were over 1000 household responses to this survey, therefore, the requirement for having a distinct Planning Policy for Biodiversity has been evidenced by the Shaftesbury population.</p> <p>Considering this was the highest scoring area, with over 85%, would indicate that it would be imperative to ensure all further developments conformed and supported Biodiversity protection and enhancement.</p> <p>The Shaftesbury NHP group did not correspond or open up this area for discussion to justify why this important feedback has been rejected and ignored.</p> <p>Intention:-</p> <p>To increase biodiversity by maintaining and improving the conditions and habitat for flora and fauna and the corridors that link them</p> <p>Policy:-</p> <p>Development proposals must ensure that local biodiversity will not be harmed either directly or indirectly. Where opportunities exist, new habitats should be created to enhance the ecological network (incorporate bee/swallow bricks, bird boxes and edible planting in the housing development). In exceptional circumstances where impact is unavoidable, developers shall demonstrate that appropriate mitigation and/or compensation will be provided and will aim to achieve a net enhancement to biodiversity in Shaftesbury. Permission will not be supported if significant harm resulting from development cannot be avoided.</p> <p>Whole document</p>
--	--	---

	<p>There are many statements made within the NHP which are either factually incorrect or are not evidenced based or are completely contrary to evidence and are no doubt opinions of some of the councillors. (There are many discrepancies – here are a few)</p> <p>A) P81 The Cricket Club is 750m from St James – statement on P81 which has been feedback to the NHP group is false. The group have not corrected the figure.</p> <p>...Current target: 14.2ha 2031 target: 16.1ha Current provision: 8.9ha The current provision covers only facilities within the town and includes the pool (0.02ha) and Shaftesbury School (5.49ha, currently restricted access). The shortage of flat land has led the Cricket Club to be based southwest of the town, more than 2,500m away...</p> <p>a) P80 and P81 The FIT calculations are incorrect. FIT is based on Open Space in relation to houses and also the Off-site Play Area Contributions. Not all Open Spaces have been included in either the diagrams or the calculations. Also, the Off-site s106 developers contributions have not been included. The Town Council owns 7 acres of land for a Cricket Club which is 750 metres from St James st.. – Trinity Green, East of Shaftesbury – is 1-2 acres of recreational community land, this is excluded. SUDs and the triangle of land (Persimmon Parcel 6&7) are also excluded from P80 map. Therefore, the whole of the FIT calculations on p81 are misrepresentative of the correct status of Open Spaces. These errors have been communicated to the NHP group and have been ignored.</p> <p>b) P90 & 91 Affordable Housing is need is not evidenced based. No key for Gold/Silver/Bronze. It is understood that Gold is the only validated ‘affordable housing need’ – 24. In fact, too many housing developments are occurring in Shaftesbury and these developments either have Affordable housing or Affordable Housing Contributions. Without any doubt, the public appetite for further housing development is nil. Therefore, the statement.... The delivery of affordable housing is important to our residents and 75% of respondents believe that there should be more affordable accommodation built for local people and essential key workers in Shaftesbury....is not true and is 75% of 230 people who responded to this question out of a total population of 8000 is not evidence.</p> <p>There are other discrepancies in maps – SFCL1 map is missing community open spaces ‘purple shading’ for Trinity Green, SUDS, Persimmon Triangle as per Parcel 6&7 Planning Application. SFHE3 is incorrectly showing protected employment land covering land allocated for the Bypass corridor and allotments – where can clearly be seen in SFHE4 – which indicates the position of the reserved bypass corridor.</p> <p>SFCL2 no evidence</p> <p>There is no evidence in any of the surveys conducted by NHP that this planning policy should exist.</p> <p>In my opinion, the planning policy SFCL2 has been added to the NHP in an attempt at blocking the Persimmon Homes planning application 2/2018/1773/OUT at the LPA level. This could be considered an abuse of the NHP</p>
--	--

		<p>process.</p> <p>SFHE3 – no evidence</p> <p>There is no evidence that supports the statements and opinions made within this planning policy on p34.</p> <p>Currently (April 2019) Persimmon Homes is requesting planning consent to develop this site. Their proposal to create 135 homes has been opposed by Shaftesbury Town Council,</p> <p>...Care homes that employ an equivalent number of staff as a typical B1 type use will be considered as an employment use. However, they should not be located on industrial estates where their occupants would be disturbed by the associated noise etc.</p> <p>The statement above highlighted in ‘yellow’ is someone’s opinion. There has not been one statement made by any member of the public which supports this statement. This is an abuse of the NHP process.</p> <p>Section H</p> <p>All references throughout the NHP regarding there no requirement for a new school within Shaftesbury is not evidenced. There is no numerical figures showing the number of houses due to be built – estimated children – and location of homes – with travel distances.</p> <p>Shaftesbury has two known issues which have not been discussed or disclosed within the NHP – parents driving children to and from Motcombe Primary and Abbey View Primary, St James Road.</p> <p>There has been a residents meeting where Motcombe residents have made complaints regarding the high number parents driving from Shaftesbury through the small village of Motcombe to drop children off at the Motcombe Primary School. The reason for this is due to the smaller class sizes within Motcombe.</p> <p>Also, complaints have been issued by residents who live in St James regarding the high traffic numbers and cars parking right outside residents homes during school times for Abbey School. Parents driving from East of Shaftesbury right over to Abbey View twice a day. If Shaftesbury could offer smaller class sizes within closer proximity to homes at Primary School level, maybe this situation would be averted. These current issues and facts appear to be omitted from the NHP.</p> <p>Added to the fact that these statements made in the NHP are not based on factual evidenced; their statements are also not welcomed, because a substantial amount of s106 funding has been ear-marked/allocated for a new school or educational contributions with a number of approved Shaftesbury housing planning application. No one within Shaftesbury will want 100’s of houses to be built in this town for the s106 to be spent at another location based on these false statements made within the Shaftesbury NHP.</p> <p>Affordable Housing</p>
--	--	---

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>These statements made within the NPH are not evidenced. In fact the opposite is the case. Shaftesbury is now subjected to extensive and continuous ‘building’ without one estate being completed end to end and integrated into the Town. There is no appetite for releasing more land for Affordable Housing.</p> <p>Project HE1 – Affordable homes</p> <p>A project is proposed, led by the Town Council, to work in collaboration with the Local Planning Authority, Dorset Council, on the Affordable Homes Strategy and ensure that local needs are prioritised.</p> <p>Project HE2 – Community Land Trust</p> <p>A further project could involve exploring the viability and potential need for a Shaftesbury specific Community Land Trust.</p> <p>Delete SFCL2 planning policy because it is not evidenced and there is a distinct possibility that it has been added based on ‘opinions’ of individuals who have a vested interest in its inclusion.</p> <p>Delete SFHE3</p> <p>Delete false statements made regarding ‘no school requirement’</p> <p>Delete false statements regarding the Town Council releasing or buying land for Affordable Housing</p>
SY11	Environment Agency	<p>We note your Neighbourhood Plan Policies are seeking opportunities to enhance levels of green infrastructure and biodiversity and are in support of this, particularly Policies SFGI1, SFGI2 and SFGI3.</p> <p>Biodiversity enhancement in and around development should be led by a local understanding of ecological networks, and should seek to include:</p> <ul style="list-style-type: none"> • habitat restoration, re-creation and expansion; • improved links between existing sites; • buffering of existing important sites; • new biodiversity features within development; and • securing management for long term enhancement. • Green/blue infrastructure and recreational opportunities
SY12	Jennifer Weston	<p>The settlement boundary doesn’t give STC the right to submit plans without the knowledge of Melbury Abbas and Cann Parish Council eg Abbey School classroom 2012 and St James Church carpark 2018/9? Also discussions required at all times with MAAC PC about development of land south of A30 most of which is in MAAC parish.</p> <p>The planned bypass land should be retained and efforts made to start and complete work asap. All the new housing</p>

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>in progress and planned in Shaftesbury and Gillingham are causing traffic problems already and the situation will only get worse as the houses are completed. Neither the C13 nor A350 are suitable for the volume and size of vehicles currently using these routes</p>
<p>SY13</p>	<p>Simply Planning Ltd (on behalf of Lidl)</p>	<p>In relation to the Town Centre Map (Page 19) as contained within the Neighbourhood Plan, the inclusion of the former Cattle Market site within the defined town centre boundary is welcomed. Indeed, the planned location/siting of the Lidl foodstore is acknowledged as being a significant strategic site. The town centre map makes specific reference to its potential as a ‘store’.</p> <p>However, we would question why the site is not also shown as part of the Primary Shopping Area (PSA). The NPPF indicates that the primary shopping area is an area “<i>defined where retail development is concentrated</i>”. There is no credible argument to exclude the planned Lidl from the PSA given its relationship to the existing Tesco (included within the PSA). The former Cattle Market site immediately abuts the PSA and it is difficult to see how any other site could be better located to both the Town Centre and PSA than this site. This location affords a significant opportunity to consolidate food retail activities within this part of Shaftesbury and its importance, in this regard, should be recognised with its inclusion as part of the PSA.</p> <p>Furthermore, the front part of the site (facing Christy’s Lane) is identified as a potential significant strategic car park to serve the town centre. It is our understanding that part of the Cattle Market site has, in the past, been utilised as car parking to serve the town centre. Whilst we recognise the car parking pressures faced by residents of Shaftesbury, the ‘hiving’ off of a large part of the Cattle Market site for car parking takes a far too simplistic view. Whilst there will likely be no net loss of car parking space, when compared to the previous uses of the site, the Neighbourhood Plan should recognise that additional car parking is only likely to come forward as part of the planned retail development of the site. Whilst any parking will be sufficient for customers to both visit the store, alongside other retail and related facilities in the town centre, it will not be used solely as a strategic car park for the town. This distinction should be acknowledged.</p> <p>Within the Neighbourhood Plan, there appears an apparent conflict with both the existing Development Plan and, indeed, earlier policies within the Neighbourhood Plan in that the former Cattle Market is also shown as employment land on the Map of Employment Area (SFHE3 – Page 35). Clarity is sought on this point.</p> <p>Having regard to the commentary above, we would suggest the following modifications to the Neighbourhood Plan:</p> <ol style="list-style-type: none"> 1) The proposed PSA should incorporate the proposed Lidl store and at least part of the former Cattle Market Site. 2) Clarity is required on the Town Centre Map with regards to identified ‘strategic car parks’. The reality is that additional car parking is only likely to come forward as part of redevelopment proposals for the former Cattle Market Site.

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>3) The Map of Employment Areas (SFHE3 – Page 35) should be updated to remove the allocation of former Cattle Market Site. This is in direct conflict with the retail aspirations for the site. The location is now longer in employment use and is not an appropriate location for traditional B-Class Employment Uses.</p>
SY14	Persimmon Homes	<p>Persimmon welcomes the opportunity to comment on the SNP. There are a number of Policies and/or text continued in in the draft Plan (and supporting evidence) which require deletion or amendment.</p> <p>Persimmon have interests in a Site to the south of the A30, Salisbury which is allocated in the local plan and SNP for employment uses. As detailed in these representations, the SNP should recognise that the Site is more suited for a mixed use, residential-led allocation.</p> <p>SFHE 1: Sustainability of New Developments</p> <p>The first part of this policy states that ‘...there remains a substantial housing supply in comparison to the adopted Local Plan requirement’. This is a misleading statement given that the Council is currently unable to demonstrate a sufficient supply of deliverable housing sites as recently evidenced by the allowed planning appeal on land to the west that adjoins the Site.</p> <p>SFHE2: To Learn from the Issues that have Arisen from Previous Large-scale Housing Developments in Shaftesbury</p> <p>The Policy is unclear in its drafting. The first sentence indicates that the principle listed in the Policy applies to all housing development sites, yet the subsequent bullet point suggests that sites should only be small to medium sized (i.e. up to 1ha in size). The first bullet point of this policy is considered superfluous and should be deleted. There are also provisions in this first section of the Policy which refer affordable housing provision, but affordable housing may not be required if a small or medium site does not deliver 10 or more units.</p> <p>The Policy also sets out separate guidance depending on the scale of a site (i.e. whether it is above or below 1 ha in size) or its capacity (i.e. whether it exceeds 10 or more dwellings). For sites above 10 units or 1ha, the policy requires that part of the housing mix include accommodation for older people. Persimmon Homes are not aware of any evidence to justify a requirement for all major sites (10 or more units) to provide older persons accommodation. Notwithstanding the above, there is also no evidence (need or viability) to justify the proposed thresholds.</p> <p>With regards to affordable housing, the Policy makes reference to giving priority to those with a ‘local connection’ in housing need. Firstly, ‘local people’ is not defined which makes implementation of the policy challenging, Secondly, priority for affordable housing should be based on housing need acuteness across the Dorset Council’s administrative area in line with its existing allocations policies. Priority should not be based on whether a person is deems to be a ‘local’. The application of such ‘local’ restrictions limits the market to which a Registered Provider can operate within. This has a negative impact on the value of the affordable housing stock provide as part of a development and ultimately has a negative impact on the viability of a development. There is no evidence to support this approach in</p>

		<p>the SNP.</p> <p>The Policy also make reference to using a Community Land Trust as a ‘suitable delivery vehicle’ for affordable housing. There are a number of other suitable and arguably more effective means of delivering affordable housing. There should be no presumption (implied or otherwise) that the Policy favours Community Land Trusts to deliver affordable housing. It is suggested that the reference to a Community Land Trust is removed from the Policy wording, but could be expanded upon in the supporting text.</p> <p>Finally, the policy requires the ‘pepper-potting’ of affordable housing. Whilst it is agreed that a mix of housing and tenures is desirable, from a housing management perspective the grouping affordable housing in clusters tend to allow for more efficient management, particularly across larger development sites. It is suggested that this element of the policy includes the qualifying provisions: ‘where possible and practical’ in order to better reflect and not undermine the affordable housing policy in the adopted Local Plan.</p> <p>SFHE3: Encourage Conditions for Attracting and Retaining Employment</p> <p>This Policy repeats that set out in the adopted Local Plan and is therefore unnecessary. Notwithstanding the above, National Planning Policy requires that Plan consider alternative uses for allocated sites that have not been implemented. The Site has been allocated for employment uses for over ten years, and despite an on-going comprehensive and lengthy marketing campaign no commercial developer has been willing to take on the Site. There is no demand for this employment land. The justification for the wider range of uses (i.e. housing, retail, commercial and education) as proposed is set out in the submitted planning application should be read alongside these representations. It is suggested that this Policy is either deleted or amended to allow for a mixed use scheme to come forward.</p> <p>The supporting text to this policy recognises that other non-B uses can provide employment provision and that consideration of wider variety of employment generating uses may be appropriate for existing employment areas. This is to be welcomed as the approach reflects provision set out in the NPPF including allowing the Plan to respond to changing market conditions and demand. It is Persimmon’s view that such flexibility should also extended to employment land / allocations (and should not exclude C-uses for reasons set out above). It is advisable therefore that the flexible-use provision is recognised in the Policy as opposed to the supporting text. Finally, there is also no justification for the threshold at which care homes would be eligible to count towards job provision, and the comment that care homes should not be located on an industrial (employment) site is speculation and not justified. Amenity issues will be dealt with through the planning application process. There should be no assumption that different uses will be incompatible.</p> <p>SFGI2: Ensure Development Respects Shaftesbury’s Topography and its Position in the Landscape</p> <p>The Policy makes reference to the designation of areas shown on Map SFGI of the SNP and listed in the Local Green</p>
--	--	--

		<p>Space (LGS) Green Infrastructure Audit which supports the Plan. It is unclear why the plan makes reference to two separate sources of LGS. This is helpful for readers of the SNP. The relevant elements of the Green Infrastructure Audi should be reference in the plan to assist with clarity and implementation of the Plan.</p> <p>The Green Infrastructure Audit specifically identifies Persimmon Homes’ Shaftesbury Road site. The Audit refers to the Site as being located on a ‘gentle slope’. This is not consistent with the description of the Site sets out in Policy SFGI2 (see below) which creates a conflict between the SNP and Green Infrastructure Audit. Also, for reasons set out below, the SNP’s claims that the Site’s location is ‘sensitive’ is a clear overstatement. The Audit suggests the Site should be included in the ‘revised Slopes Policy’ of the SNP, but it is not clear whether this relates to the current Submission draft Plan Policy, or an earlier draft of the SNP. This requires clarification. Finally, the Plan states that any open space within the Site should be designated as Local Green Space as soon as possible. It should be recognised that in order to designate Local Green Space a number of criteria set out in the NPPF need to be met. It is therefore premature to suggest that the open space should definitely be designated as such. It should also be recognised that new Local Green Space can only be designated through the Local Plan or Neighbourhood Plan updating/review process The SNP also requires tree and hedgerow planting will be on all sides and within the Site. This is sweeping statement that is not justified both in terms of an evidence based (notably landscape) and in terms of integrating the Site with the adjoining urban area to the north and housing site immediately to the west.</p> <p>Map SFGI2 identifies key slopes in the area. The Site is located within an area described as being ‘generally level areas or higher ground’ and ‘very sensitive to development’. It is not clear whether Policy SFGI2 applies to development in this area. Furthermore, it is inconsistent with the allocation in the Local Plan (and the proposals in SFHE3 of the SNP) to suggest that this land is highly sensitive when it has been proposed for development. As demonstrated through the planning application submission for the Site, development of the Site for housing (as opposed to employment) would have a reduced landscape impact, which further underscores Permission’s Homes suggestion that the Site is more suited to a sensitively designed mixed-use residential-led scheme.</p> <p>Map SFGI2a refers to a notable view from Higher Blandford Road. The view fails to recognise the recently approved appeal scheme on adjoining land to the east of Blandford Road, which will likely result in the loss of this view once constructed. This viewpoint should be deleted.</p> <p>SFDH 2 High Quality Design</p> <p>The Policy requires new dwellings to meet Building for Life accreditation and a Home Quality Mark rating to demonstrate their sustainability credentials. There has been no testing of the viability impact of the proposed enhanced standards, and no provision for such standards is made in either the local or national policy. This element of the Policy should be deleted or should be amended so that developments are ‘encouraged’ (not ‘required’) to meet such standards.</p>
--	--	---

		<p>SFDH5: Accommodating Vehicles</p> <p>When determining parking provision, the SNP Policy directs applicants to guidance contained in both Local Parking Standards and Manual for Streets. It is advisable the Policy refers to a single source of guidance to avoid confusion and conflict. There is a Dorset wide parking document already in place.</p> <p>There is also no evidence assessing the viability impact of car charging points. This element of the policy is not justified. The NPPF advocates provision of electric vehicle charging points within new developments, but that this should be set at through building regulations or planning policy developed at the local level (i.e. by Dorset Council) and not through the Neighbourhood Plan process. It is also noted that the current adopted Local Plan for the area does not include such provision creating a clear issue of conformity between adopted Plan and the SNP.</p> <p>If the SNP makes policy in this area there are several issues that it will need to consider carefully. Firstly, any policy should be justified by evidence demonstrating the technical feasibility and financial viability of its requirements This justification should also include confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. This is necessary as if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary, and this would need to be reflected in any costs within the viability study.</p> <p>The NPPF also requires that any policy, including a requirement for charging points, should be clearly written and unambiguous (para 16). The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives as may be required by evidence underpinning the Policy.</p> <p>Until such time as the SNP undertakes the above, electric charging element of the Policy should be deleted.</p> <p>SFDH6: Building styles and detailing</p> <p>This Policy seeks to ensure that development is designed to reflect the level of detail typically found in traditional buildings of similar form and function. In other sections of the SNP, the Plan requires development to respond to the character of the surrounding area and its context. As described in the character assessment of the SNP, not all parts of Shaftesbury are traditional in character. As such, there should be no expectation that traditional design approaches should be prioritised in all new developments. The Policy also sets out detailed guidance on building facades and building / storey heights. The enhanced design required by the Policy has not be subject to viability testing and may be challenging to implement within some regulatory drivers relating to new build housing (including building regulations). Ultimately, this is an issue for the Case Officer and at a Local Plan level. The Policy should be amended accordingly.</p>
--	--	---

		<p>SFDH7: Building Materials</p> <p>The Policy refers to the use of materials ‘that celebrate the area’s heritage’. It is unclear what is meant by this statement. This will render implementation of the Policy by planning officers and applicants alike extremely challenging. This element of the policy is superfluous and should be deleted.</p> <p>SFDH8: Preserve Shaftesbury's Unique and Fascinating Past</p> <p>The Policy requires an archaeological assessment for sites where historic remains may be present. Application submission requirements, including those in relation to heritage, will be set out in the Council’s Local List. There is no need for this to be restated in the SNP.</p> <p>Policy SFCL1 Improve and Increase the Range and Availability of Community Facilities</p> <p>The Policy sets out an expectation that new housing developments will provide new greenspace in in line with the standards and recommended distances defined by the Local Plan / Fields in- Trust. Again, referencing two standards could create conflict between policy provision and unnecessary uncertainty and challenges in the implementation of the Policy.</p> <p>SFCL3: Support Safe Walking and Cycling Routes that are Well Connected</p> <p>The final paragraph of this Policy states that contributions will be needed ‘where reasonable and related to that development’ - this is not the test of a development attracting a contribution - a contribution should make the development acceptable in planning terms which is a significant legal test. Furthermore the Policy wording does not reflect the tests set out in the Community Infrastructure Levy (CIL) Regulations (as amended). The test of the CIL Regulations should either be stated in full or this element of the Policy deleted.</p> <p>Appendix H: Education</p> <p>Paragraph 7 of this Appendix implies that Shaftesbury does not need a new school based on the current demographics of the Town. Whilst this is correct in the immediate term, the demographic profile of the town will not remain static throughout the lifetime of the SNP.</p> <p>Discussions with Dorset Council education department as part of the negotiations associated with the Persimmon planning application, has indicated that a new school is likely to be required to meet demand in the near future (circa 5 years). A new school is proposed as part of the planning application submitted for the Site.</p>
SY15	Richard Thomas	<p>The draft contains a statement that policies in favour of radical demands or changes to planning policy in support of measures to drastically reduce the effects of climate change cannot be included because central government policy does not allow this. This cannot be right and should be challenged. If communities chose to act in effect in advance of central government policy because they think that is the responsible thing to do that surely must be supported on</p>

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>the grounds that sometimes local people are ahead of the game and centrally-based authorities have to catch up. Whitehall frequently does not know best.</p> <p>The document needs the introduction of a 'climate change' policy to underwrite the necessity and validity of planning measures to mitigate against the catastrophe of human-induced climate change.</p>
SY16	Shaftesbury Civic Society	<p>We are perfectly happy with the draft version as it stands and thank you and the team for all the effort that has gone into the preparation. As we understand it due to changes to the NPPF in 2018, clause 14(a), we shall all be revisiting the subject on a regular basis and that will be the time to make adjustments, in the light of practical experience.</p>
SY17	Natural England	<p>Natural England have provided advice dated 1st April 2019 on the environmental considerations under the SEA and HRA screening consultation. Natural England have no further comment on the policies outlined in the plan.</p>
SY18	Bernard Ede	<p>page 13 VISION FOR 2031; "Best example etc.", is vague & could be stated by any town. Statement of criteria, components etc., & a visionary plan would be helpful, e.g. see Thame NP.</p> <p>page 18 THE TOWN CENTRE item 2.1 Key Messages & Aims; No referend to town's important & varied public realm within a short distance & the importance of hard-surfaces, edges etc.</p> <p>page 19 MAP SFTC Town Centre; shows LIDL site as "significant Strategic Car Park"; however LIDL development will preclude this.</p> <p>pages 32-34 POLICIES SFHE 2 &3 Housing & Employment; no reference to SuDS & latest CIRIA Guidance publications - include in Appendix M - Schedule of Evidence Sources.</p> <p>page 35 MAP SFHE 3 Employment Areas; magenta-coloured areas shown on plan (e.g.Royal Chase Hotel) are not shown in key</p> <p>page 37 MAP SFHE 4 Bypass Corridor; omits examination of possible viable route/alignment options to north (albeit in Wiltshire) clarify that alignment to south links to C13.</p> <p>page 43</p>

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>MAP SFGI 1 Local Green Spaces & Important treed Areas; clarify that "Local Green Spaces" is a Statutory Designation which requires significant justification & wouldn't apply to all the open spaces identified in the Plan "Local Green Spaces" & "Important Treed Areas" identified in the Map are not mutually-exclusive & should be mapped separately. e.g. treed areas on Castle Hill, Park & Pine Walks are not shown "The Wilderness" is not a local green space (either informally nor as a Statutory designation), it is an important treed area in private ownership It would be helpful to map - open spaces as a land-use, visually important open areas (whether in public or private ownership) & important treed areas separately for clarification.</p> <p>Page 80 MAP SFCL 1 Community Facilities; Castle Hill Green, & Mound, & St John's Churchyard are not shown as Informal Recreation/Amenity spaces. The proposed Community Hall & Trinity Green public open space & allotments are not shown (as per the Eastern Development Master Plan). Abbey Ponds (one of the Scheduled Ancient Monuments) are not a tourist attraction; they are remote/inaccessible, overgrown & on private land.</p> <p>Page 83 MAP SFCL 2 Shaftesbury Tourism; Abbey House is not a tourism attraction but a private, inaccessible dwelling The Grosvenor Hotel is incorrectly shown as a pub. Castle Mound is shown extending into the private Castle Gardens.</p> <p>Page 85 MAP SFCL 3 Existing & Proposed Footpaths & Cycleways; Dorset County Council's Strategic Cycleway Network is not shown. The Hardy Way & White Hart Link footpaths are not shown. The text duplicates the key. Existing & proposed (both committed & desirable) should be clarified. Explanation about segregated cycleways (Government Policy) & difficulties of retro-fitting cycleways would be useful.</p> <p>GENERALLY; OMISSIONS; - no reference to surrounding agricultural land, including land-use & development policies including siting & form of buildings, massing, use of materials, colour, visual impacts from high ground, - agro-forestry opportunities etc. hedgerow & tree cover protection & enhancement for water management, shelter, wildlife habitat, locking-up carbon, releasing oxygen, filtering particulate pollution</p>
--	--	---

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<ul style="list-style-type: none"> - B 3081 Link Road from Gillingham & it's traffic, environmental & visual impact. - no policy on 'windfall' sites including their potential overdevelopment. - timetable for completion of the Eastern Development including the northward extension of the Link Road. - policy on impermeable hard-surfacing of front gardens for parking - provision of school - site-planning & design guideline diagrams for strategic sites e.g. former ATS & Budgens sites - strategic pedestrian links to town centre e.g. through LIDL site <p>COMPLAINT; Members of the original Neighbourhood Plan Group were prevented from attending the formation meeting of the new Group by Shaftesbury Town Council, nor invited to fill the subsequent two vacancies.</p>
SY19	Dorset Council	<p>General points on LP conformity</p> <ul style="list-style-type: none"> • We are generally supportive of many of the policies in the submitted neighbourhood plan (NP). The plan is generally well laid out and attractive. • However, in our detailed comments below we do flag up one or two occasions where we believe particular NP policies are not in general conformity with strategic policies in the development plan. • In particular, we maintain that Policies 1 to 21 of the North Dorset Local Plan Part 1 (LPP1) are strategic policies. We note that although the submitted NP makes references to the LPP1 it makes no reference to any specific policies within LPP1. • We believe of particular relevance is Policy 2 ‘Core Spatial Strategy’ which places Shaftesbury as one of the four main towns in the former North Dorset District. The policy states that the four towns “will be the main focus for growth, both for the vast majority of housing and other development.” • In addition, Policy 18 ‘Shaftesbury’ is highly relevant, and the provisions within it should be regarded by the NP. The policy establishes a minimum number of homes to be delivered at Shaftesbury over the period 2011-2031, as well as identifies employment land sites, and a broad range of infrastructure requirements. • Although there is no specific requirement for a NP to quote or cross-refer to policies in a corresponding local plan, we feel that without due consideration being given to these policies there is a risk that they become overlooked. • One of the basic conditions is that neighbourhood plan policies should be in general conformity with strategic policies in the development plan. Although the submitted basic conditions statement considers the proposed NP policies against the adopted LP policies, Dorset Council does not always agree with the

		<p>conclusions.</p> <ul style="list-style-type: none"> • The main text of the NP itself makes no reference to the basic conditions statement or the need to be in general conformity with strategic policies in the local plan. Again, although this is not a requirement, a lay reader may not appreciate that the plan is obliged to meet statutory ‘basic conditions’. • There is also a risk of unnecessary policy duplication. NPPF para 16f specifies that plans should avoid this. Where appropriate we point this out in our detailed comments below. <p>Section 1.6, pages 10-11</p> <ul style="list-style-type: none"> • We note the large tables of figures on these two pages. They appear a little out of place near the start of the document, sitting between the Index of Policies (1.5) and The Neighbourhood Plan Area (1.7), with very little commentary to explain why they are there. It might suffice to add a simple paragraph in section 1.7 that explains that the town’s population has grown by 18% in recent years. These tables could then be moved to an Appendix or supporting document as part of the evidence base. • Notwithstanding the previous comment, we wish to point out that the figures in the third and fourth columns of the table are the number of dwellings (or homes) and not the number of households. This is an important distinction to make, as ‘dwellings’ can be vacant or act as second homes, whereas a ‘household’ can be homeless or share the same physical address with another household. • We update the housing trajectory in the North Dorset Annual Monitoring Report each year to reflect the latest information regarding build rates and planning permissions. The trajectory published in the 2019 AMR agrees that the total number of dwellings predicted to be provided in Shaftesbury between 2011 and 2031 is approximately 1250. However, the future rate of delivery has been amended slightly since the 2018 AMR and so differs to this table. <p>Section 2.2, Map SFTC, page 19</p> <ul style="list-style-type: none"> • The proposed Town Centre boundary is very similar to the Town Centre boundary recommended by Carter Jonas in their Joint Retail and Commercial Leisure Study 2018. As noted in the supporting text, the main difference is that the SNP version includes Bell Street car park, Tesco car park, and the former Cattle Market site. • The red line indicating the active frontages also appears to be identical to the recommended Primary and Secondary Frontages in the Carter Jonas study. The main difference is that the NP does not differentiate between Primary and Secondary frontages. • We note that since NPPF 2018 there is no reference to Primary and Secondary frontages in national policy. However, we are not aware of anything that prevents them from being identified in local or neighbourhood
--	--	---

		<p>plans where there is the evidence to do so.</p> <ul style="list-style-type: none"> • The Primary Shopping Area is also very similar to that recommended in the Carter Jonas Study. • LPP1 Policy 12 ‘Retail, Leisure And Other Commercial Developments’ states that town centres, primary shopping areas, and primary and secondary shopping frontages will either be defined or reviewed in a future local plan, or in a neighbourhood plan. • In summary, as this map largely agrees with work undertaken to inform the North Dorset Local Plan Review (now the new Dorset Local Plan), and is consistent with LPP1 Policy 12, we support it. <p>Policy SFTC1, page 20</p> <ul style="list-style-type: none"> • The policy lists a wide range of aspirations for development to aim to achieve in the town centre, all of which should help promote a vibrant town centre. It also prevents development that could undermine these aspirations. It seems to be a proportionate response to maintain a healthy town centre and is therefore supported. <p>Policy SFTC2, page 22</p> <ul style="list-style-type: none"> • The policy supports a broader range of uses than is permitted in a Primary Shopping Frontage or Secondary Shopping Frontage by LPP1 Policy 12, but we acknowledge that the trend is for retail to become less important to town centres, and so alternative uses such as leisure need to be found. Therefore we have no objection to this policy if it helps maintain town centre vitality. <p>Policy SFTC3 page 23</p> <ul style="list-style-type: none"> • As most of the town centre (essentially everything except Tesco and the Cattle Market site) is part of a conservation area, a policy promoting sensitively designed shop frontages and street furniture seems appropriate. It is therefore supported. <p>Policy SFTC4, page 24</p> <ul style="list-style-type: none"> • It is understood that parking (or lack of it) is an issue affecting Shaftesbury town centre. Clearly, reducing the need to use a private car would be better from an air quality and congestion perspective, but as the provision of public transport is largely out of the scope of a neighbourhood plan or even the town council, we recognise the proposed policy is the only reasonable option available to the NP. • In terms of environmental impact, it is noted that the policy supports electric vehicle charging points. As EVs have the potential to reduce greenhouse gas emissions and improve air quality in urban areas, this is supported.
--	--	--

		<p>Section 3.1, pages 26 to 32</p> <ul style="list-style-type: none"> • The repeated suggestion that LPP1 sets an upper limit for the number of new dwellings in Shaftesbury is incorrect (e.g. use of words like ‘quota’). LPP1 Policies 6 and 18 state ‘at least’ 1,140 dwellings for Shaftesbury, and at no point suggest an upper limit. • Paragraphs 8.101 and 8.102 in LPP1 make clear that growth beyond that explicitly planned for in LPP1 was envisaged at the time of the plan’s adoption. For example, 8.102 states: “The strategy for the town will see the building out of sites already allocated or with planning permission for housing in the early years and a more limited amount of additional greenfield land later in the plan period.” <p>Policy SFHE1, page 29</p> <ul style="list-style-type: none"> • The first sentence seems to be aimed at the authors of the neighbourhood plan rather than at anyone determining planning applications. As it does not provide any guidance to the latter group, this sentence should be deleted. • The second sentence begins “In those circumstances, where” This doesn’t make sense as it doesn’t appear to refer to the previous sentence. • Notwithstanding the apparent typo in the second sentence, it requires planning applications to include an assessment of social, economic and environmental impacts. However, this only applies in cases “where the Local Plan housing supply policies are not considered up-to-date”, and so essentially only applies to applications that have to be determined using policies in the NPPF (as required by NPPF para 11d). • The main purpose of the policy appears to be to require further information from applicants. However, we believe Dorset Council already requires all the information it needs to determine planning applications. As we cannot see clear justification for this policy, or exactly what it would entail beyond existing requirements, Dorset Council recommends that it is deleted as it creates an unnecessary burden to applicants. <p>Section 3.2, page 30</p> <ul style="list-style-type: none"> • Fourth paragraph - we welcome the recognition of the Dorset Local Plan that is currently at an early stage of production. • The fourth paragraph then refers to “the following policy” – which is assumed to be Policy SFHE1 on the previous page. • The fourth paragraph goes on to state that policy [SFHE1] “tries to ensure that any shortfall in housing elsewhere in Dorset is not seen as a reason to allow development outside of the settlement boundary, without taking all of these issues into account.” Notwithstanding our recommendation above to delete policy
--	--	---

		<p>SFHE1, it is not clear from the policy as currently worded how it takes into account wider strategic issues such as “how Shaftesbury strategically fits within the wider area”.</p> <ul style="list-style-type: none"> • In terms of how Shaftesbury fits within the wider area, this is primarily established by Policy 2 (Core Spatial Strategy) of the LPP1. It states that Shaftesbury (as one of the four main towns) will function as a main service in North Dorset and the towns will be “the main focus for growth, both for the vast majority of housing and other development.” Therefore, in terms of meeting the District’s needs, Shaftesbury is considered to be a preferred location following the strategic policies set out in LPP1. Any attempt for the neighbourhood plan to undermine this strategy would risk non-compliance with basic condition (e) ‘general conformity with the strategic policies contained in the development plan’. <p>Policy SFHE2, page 33</p> <ul style="list-style-type: none"> • As with the previous policy, it is not clear whether this policy is directed at plan makers or decision makers. The following points assume the latter. • The first section of the policy starts by appearing to block large sites, stating, “Sites should be small to medium size....” However this interpretation is contradicted by the second column which states, “If large sites over 1ha in size are proposed....” • Dorset Council feels that attempts to block (or even discourage) large scale development at one of North Dorset’s defined towns would undermine strategic policies (see comments above regarding basic condition (e), and also NPPF para 29). Therefore this policy should be redrafted to remove the ambiguity identified above. Perhaps change the start of the first section to: “Small to medium size sites should be delivered in a timely manner...” and the start of the second section to “Large sites over 1 ha in size should be properly master planned....” • The threshold of 1ha for ‘large sites’ seems too low given the requirements that this policy places on them. For example, it requires such development to be phased. At a typical town density of 30dph, a ‘large’ site of 1.1ha would deliver 33 dwellings. These could easily be built within 12 months as a single phase. We suggest raising the large site threshold to over 100 dwellings as developments less than that would in normal circumstances take less than 3 years to build out and so do not require phasing. • We note the requirement for sites to be delivered “in a timely manner”. Perhaps this is a reference to NPPF para 76 which allows LPAs to amend the condition specifying the time limit for development commencement. However, it should be noted that under the current system, once development has begun then permission remains extant with no end date. Unless the meaning here can be clarified, we suggest that this phrase is deleted. • In summary, this policy requires careful editing to ensure it is useful to the decision maker and unambiguous
--	--	---

		<p>to all parties (as per NPPF para 16d).</p> <p>Policy SFHE3, page 31</p> <ul style="list-style-type: none"> • We feel the policy as worded is too reliant on the supporting text as the policy text doesn't specify what the land south of the A30 is being safeguarded for. • The supporting text also discusses a limited range of supplementary uses, largely mirroring criteria o, p, q, and r of LPP1 Policy 11. • NPPF para 16f states that plans should avoid unnecessary duplication of policies. Since this policy and supporting text appear to repeat what is already set out in LPP1 Policy 11, we are unsure of its value and suggest that it could be deleted to avoid unnecessary duplication. <p>Map SFHE3, page 35</p> <ul style="list-style-type: none"> • It is confusing whether all the uses shown on the map are covered by Policy SFHE3 or just the Employment Area (yellow) and Protected Employment Land (hatched). The other uses are not discussed in the supporting text so it is assumed that they are not covered by this policy. Also, the map is too small scale to show most of the other uses in a meaningful way. To avoid confusion we recommend only showing uses that are covered by Policy SFHE3 on this map. • Notwithstanding the first point, the map includes areas shaded in magenta. It is believed that these denote hotels and B&Bs, but this isn't shown on the key. Again, it is questioned whether these should be shown on this map, particularly as they are covered by Policy SFCL2. • The map incorrectly shows the Local Plan employment allocation to the south of the A30. The reserved eastern bypass corridor forms the eastern edge of the site. • Wincombe Business Park is missing the industrial units nearest to its entrance to the A350 (SW corner). • We question why the cattle market site is shown as an employment area. The site has never had this allocation/designation. As the name implies, the site was used to auction livestock until recently. The site is also shown by Map SFTC which includes it in the Town Centre and labels part of it as "Significant Strategic Site (Store)" and another part of it "Significant Strategic Car Park". It is felt that also designating it as a protected employment area must be a mistake. • Blackmore Vale Dairy (which lies outside the settlement boundary) has outgrown the original Local Plan allocation, dating from 2003. However, the Employment Area shown on Map SFHE3 is larger still and includes further greenfield land to the east and north. Although we are generally supportive of business expansion, given that this is an open countryside location we feel that there should be some supporting text to indicate
--	--	--

		<p>that this is the intention. It should also reference an evidence document that demonstrates that the site has been assessed with a clear conclusion that it is suitable for further development.</p> <p>Policy SFHE4, page 36</p> <ul style="list-style-type: none"> • The current allocation of the eastern bypass corridor was made by the 2003 Local Plan (and was derived from the Dorset Structure Plan which was approved in 2000). Even after 20+ years there is no known source of funding to deliver this bypass. • As there is no schedule for the delivery of the bypass, it is not clear what is meant by “early provision”. Suggest deleting the word “early”. • There is no known economic case for building the bypass in isolation. Currently the best hope of demonstrating an economic case lies with the strategic aim of improving the links between the M4 and the Dorset Coast. Following the Budget in March 2020 we are aware that the Government wishes to explore this further (as part of RIS2). Potentially the A350 via Shaftesbury could form part of that strategic route, however there are other options, principally via Salisbury. • As such, Dorset Council note the content of this policy, but have concerns over its deliverability. NPPF para 16(b) tells us that plans should be “aspirational but deliverable”. With regards to transport routes, para 104(c) tells us that planning policies should identify and protect them “where there is robust evidence”. Finally, with regards to existing allocations, para 120(a) tell us that where there is no reasonable prospect of an application coming forward for the use allocated in a plan, we should, “reallocate the land for a more deliverable use ... (or, if appropriate, deallocate a site which is undeveloped).” Dorset Council is considering this matter in the context of NPPF as part of work being undertaken to prepare a new Dorset Council Local Plan. <p>Section 4.1, page 39</p> <ul style="list-style-type: none"> • Third column, second and third paragraphs – need to clarify which “national standards” are being referred to. Presumably “Fields in Trust standards” but this shouldn’t be assumed. • Third column, second paragraph (“We have applied the national standards formula...”) is not clear and requires an edit. <p>Policy SFGI1, page 42</p> <ul style="list-style-type: none"> • For clarity the start of the policy text should be revised to “The areas shown on Map SFGI1 and listed Appendix L are designated as Local Green Spaces....” A similar change should be made to the start of the final paragraph that refers to Important Treed Areas.
--	--	--

		<ul style="list-style-type: none"> • We have been made aware of a discrepancy regarding the boundary of the proposed LGS known as Rolt Millennium Green (site 27). The Town Council have written to us explaining that they wish to amend the boundary. • The policy is in general conformity with LPP1 Policy 15 ‘Green Infrastructure’ which states: “Neighbourhood plans should consider measures that assist in delivering key green infrastructure benefits as outlined in this policy, including the designation of local green space, where appropriate.” • However we have concern over the sheer quantity of LGS sites that have been identified by the plan. LGS status carries particular weight in national policy (NPPF para 101: “Policies for managing development within a LGS should be consistent with those for Green Belts.”). For this reason, there should be a reasonably high threshold for identifying them, as outlined by paras 99-100 of NPPF. For example, it states that LGS should be of “particular importance”, and that a site should be “demonstrably special to a local community and holds particular local significance.” While each NP group will take a different approach, we note a striking difference between nearby Gillingham which identified 3 LGS in its NP, and Shaftesbury that has identified 56. It is our view that LGS should not be used to identify all (or nearly all) open space sites. • Specifically, Dorset Council objects to the school playing fields that it owns being designated as LGS as it is unconvinced that they meet the criteria of paragraph 100b of NPPF. On Map SFGI1 (and Appendix L), these are identified as: <ul style="list-style-type: none"> ○ Site 10 “Shaftesbury school” – it is noted that this has had limited community use in the past and none at present. ○ Site 11 “Tennis courts” – these are hard courts and therefore do not fall into the definition of green space. ○ Site 14 “Shaftesbury Primary School” – as noted, no public use at present. • Key points to consider with regards to school playing fields: a) Schools and primary school in particular are locked down and do not have public access; b) all playing fields have their own designation in Law (Section 77) that requires a submission to the Department for Education for any change in use of any area of a school site that is designed playing area (green space); c) a LGS designation would restrict the school in developing playing field areas, and taking proactive measures to develop and improve the site for the use of the children in their care. Any development of a school site has to be taken as a whole and LGS designation will limit the options. The Section 77 requires any removal of re-purposing of playing fields to be fully mitigated with equal and equivalent areas of playing field and green space being provided. • Many of the LGS sites, including sites 10, 11 and 14, also appear to Map SFCL1 (Map of community facilities, page 80) and so are covered by Policy SFCL1. We believe that in most cases, Policy SFCL1 gives these sites an
--	--	---

		<p>appropriate level of protection and so the additional LGS status is not warranted.</p> <p>Policy SFGI2, page 44</p> <ul style="list-style-type: none"> • The policy makes various references to maps. In the first paragraph it refers to map “SFG2” – it is assumed this is a typo and possibly refers to SFGI2a and/or SFGI2b. • Later references are made to map SFGI2 which appears after maps SFGI2a/b. This ordering / numbering of the maps is unconventional and confusing. • As Cranborne Chase AONB point out in their submission, the second sentence/paragraph appears to be saying the opposite of what it probably intended. Suggest amending to “On the steep slopes (as shown on map SFGI2) any development <u>that does not</u> will preserve the remaining open or wooded areas and their distinct rural character, and further building in this area will generally be resisted.” • Overall, however, this policy is supported, as features like Gold Hill and the surrounding slopes are unique features to Shaftesbury, and need to be preserved. <p>Policy SFGI3, page 49</p> <ul style="list-style-type: none"> • The value of high quality green space forming part of a wider network is recognised, and so this policy is supported. <p>Policy SFGI4, page 50</p> <ul style="list-style-type: none"> • It is understood that Cranborne Chase AONB gained status as an International Dark Sky Reserve in 2019. Although the majority of Shaftesbury lies outside the AONB, and that the town and neighbouring sites (e.g. HMP Guys Marsh) already emit a lot of light into the night sky, any measures to minimise unnecessary light pollution will be supported so long as residents and businesses can operate safely, especially during winter months. <p>Policy SFDH1, page 66</p> <ul style="list-style-type: none"> • This policy refers to Section 5.2 which identifies the key characteristics and issues facing each of the 8 character zones. The majority of the zones have historic significance – for example, zones 1, 2, 3, 5 and 7 are either wholly or largely within a conservation area and contain a large number of listed buildings. It seems to be a practical and pro-active approach to ensure that new development is appropriate to its location in the town. This is a level of detail that a Dorset-wide Local Plan cannot realistically provide. As such, this policy is supported. <p>Policy SFDH2, page 67</p>
--	--	--

		<ul style="list-style-type: none"> • Although it is admirable that the neighbourhood plan wishes to encourage better construction practices, we have concerns over feasibility and viability. • The Government encourages approaches such as passive solar design to reduce energy consumption (see www.gov.uk/guidance/climate-change), however they prefer to keep the planning and building regulation regimes separate (apart from a limited number of optional technical standards that can only be set in a Local Plan). Although we appreciate that the section of the policy regarding “target emission rates” is not a requirement but an encouragement, we feel it inappropriate to include it in a neighbourhood plan policy. It also presents real issues regarding implementation as the technical drawings necessary to calculate the Building Emission Rate are not normally done until planning permission has been granted. • The policy appears to require Building for Life and a Home Quality Mark rating – although this is slightly ambiguous as it is in the same sentence that encourages higher building regulations. If these are requirements then we are concerned that they haven’t been viability tested. • In summary, we are not sure this policy is clear and unambiguous for the purposes of a decision maker (NPPF para 16d). If it is just encouraging higher standards then the content would perhaps be better moved to supporting text. <p>Policy SFDH3, page 68</p> <ul style="list-style-type: none"> • We question whether it is realistic to expect most developments to take into consideration “microclimates” – this sounds to be a highly specialist area that is only necessary for large scale developments in inner cities. • Otherwise these all seem reasonable generic criteria to help improve the design of new buildings. <p>Policy SFDH4, page 69</p> <ul style="list-style-type: none"> • This policy promotes well designed public open space and is therefore supported. <p>Policy SFDH5, page 70</p> <ul style="list-style-type: none"> • This policy refers to both the local parking standards and the Manual for Streets, which has potential to cause confusion. This conflict needs to be resolved before the policy can be adopted. <p>Policy SFDH6, page 71</p> <ul style="list-style-type: none"> • This policy expects a high level of design detail in new development. It is appreciated that this is in response to a lot of bland late 20th century/ early 21st century developments in the town. The government have signalled an intention to “give local authorities the ability to ensure that new homes conform to local residents’ ideas of beauty through the planning system” (Planning for the Future (2020), paragraph 15) – and
--	--	---

		<p>this policy, along with others in the plan, appear to do this.</p> <p>Policy SFDH7, page 72</p> <ul style="list-style-type: none"> • This policy specifies build materials. We question whether it is realistic and unambiguous for a policy to require materials that “celebrate the area’s heritage”. Otherwise, as with Policy SFDH6, this appears to be in line with the Government’s intentions to raise design quality. <p>Policy SFDH8, page 73</p> <ul style="list-style-type: none"> • We recognise that a historic town like Shaftesbury will have considerable archaeological remains, however, it is far from unique in this respect. Existing provisions to protect and preserve archaeological remains are already in place, which this policy largely repeats. Please see NPPF para 189, LPP1 Policy 5 “The Historic Environment”, and LPP1 paras 4.159 to 4.163 in terms of existing safeguards. The main concern here is policy duplication, which NPPF para 16f recommends against. • We note that the proposed policy requires an assessment prior to the determination of a planning application. This differs from our approach of requiring an archaeological assessment via a pre-commencement condition. We believe that the proposed approach is unreasonable as it expects the applicant to incur significant extra cost before they know whether permission will be granted. <p>Policy SFDH9, page 74</p> <ul style="list-style-type: none"> • Many other neighbourhood plans have identified locally important buildings and given them policy protection. Providing the owners of the buildings have been appropriately notified, the principle of this policy is supported. • However, we are not convinced that the policy, as currently worded, gives clear direction to a decision maker when determining planning applications. We suggest it might be improved if it were re-phrased to: “Locally important historic buildings, identified in this plan, should be conserved and enhanced.” <p>Policy SFCL1, page 79</p> <ul style="list-style-type: none"> • Community facilities are important – this policy is therefore supported. <p>Policy SFCL2, page 82</p> <ul style="list-style-type: none"> • Tourism is clearly an important industry in Dorset and so this policy is supported. <p>Policy SFCL3, page 84</p> <ul style="list-style-type: none"> • Improving the network of pedestrian and cycle paths is important to reducing the use of cars. This policy is
--	--	---

Shaftesbury Neighbourhood Plan – Submission Consultation Summary of Regulation 16 Responses

		<p>therefore supported.</p> <ul style="list-style-type: none">• Shaftesbury Town Council notified us of a small number of minor changes they wish to make to proposed network of footpaths and cycleways (as shown on Map SFCL3). These proposed changes are attached as Appendix B to this submission, and they are supported by Dorset Council.
--	--	--