

CPRE NORTH DORSET

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The New Plan for North Dorset: Comments

The Vision

The Vision appears unobjectionable as it is stated, being full of good intentions, but the devil is in the detail. Are these aspirations realisable through the Policies proposed? Not entirely, I suggest. Increased housing and economic activity need to be balanced against loss of amenity. Vastly increased building and traffic volume are significant threats to market towns, villages and countryside that will not be fully alleviated by the measures proposed.

CPRE seeks a beautiful, tranquil and diverse countryside that everyone can value and enjoy; a working countryside that contributes to national well being by enriching our quality of life. We agree with the New Plan's statement that landscape and natural beauty are defining characteristics of North Dorset, with its two designated Areas of Outstanding Natural Beauty.

We believe that the Council should take a positive attitude to natural beauty and landscape. It may be tempting to think that prosperity arises only from commercial activities (including farming), but national policy and economic studies clearly identify leisure and well being as depending also on the existence and enjoyment of the uniquely beautiful English countryside. This has economic value too: people are more likely to seek attractive surroundings in the future, due to:

- A weak economic situation in the next few years
- need for lower energy consumption reducing travel abroad for holidays and leisure, and
- opportunities that new technologies bring for home and distance working.

We argue that there are many ways of achieving desirable development and that good design, ingenuity and sensitivity to landscape cost no more, and often less, than poor design and thoughtless spatial planning.

Communications, like broadband, home working and sustainable activities need to be more seriously promoted. Otherwise the sequence continues with more housing requiring more industrial activity and roads. That cycle needs to be broken by vision and innovative approaches, examples of which are to be found in Denmark and Holland, for example.

Objectives

These seem reasonable but when set against the substantial population growth none of the measures proposed are sufficient to prevent a worsening in quality of life overall, desirable as many of the measures are. The Council, in its wisdom, achieved an overall increase in housing, to 2026, from 5100 to 7000:

NDDCs response to the draft RSS argued for an overall increase in the level of housing for the District, as it was considered that the level of growth proposed in the regions more rural areas was too low to support viable communities, in particular there were concerns that this could have an impact on maintaining economic growth and delivering affordable housing.

- SHLAA, 2007

Proposals for the towns illustrate the extent to which they are at breaking point after years of massive development. It is very difficult to see how the Council justified arguing for increased development given the over-development being exposed by the New Plan, over-straining infrastructure and requiring swathes of Green-field land. Should a new government reopen housing allocations the Council should urgently seek a reduction in planned housing to a more sustainable level.

With this critical proviso the allocations of housing proposed are generally the least damaging but rigid protection of AONBs, woodland, wildlife habitats and in the towns, protection of CAs and LBs are vital. We should not try to match the facilities and employment opportunities available in conurbations; we should provide choice by seeking to make North Dorset different and it is seriously worrying that the character of towns and countryside are being lost, as they are swamped by housing, industry and traffic.

While we are supportive of the overall approach on housing allocation a number of the actual sites proposed for housing and industry are highly contentious and some are unacceptable. There is need to make the case for each site separately; that has still to be done. The report sensibly identifies options but does not adequately justify choice. CPRE has received representations from groups with concerns over particular sites and where appropriate will oppose development. We are happy to be involved with the Council in option evaluation. .

CP1-3 Climate change, Sustainability & Spacial Strategy

2.3.5 More should be done to encourage insulation, solar panels and other energy saving measures in existing buildings, subject to planning controls.

2.3.12/13 Wind turbines are inefficient and damaging to the landscape. More use of water mills and other hydraulic sources should be considered and given greater encouragement, also energy conservation.

2.3. 25/26 Greater emphasise should be given to walking, cycling and the provision of footpaths, with better pavements and traffic calmed roads in towns and villages.

2.3.28 65% of new housing will be on Greenfield land illustrating the damaging effects of such high housing growth. Use of prime agricultural land should be minimised.

The overall approach in CP3 is supported, subject to earlier comments. However, village envelopes should **not** be removed from smaller villages. It will weaken countryside protection and is quite pointless.

Option 3

Categorisation of settlements should be determined on availability of services and amenities as well of population. On this basis there are stronger arguments for giving Fontmell Magna Category C status than Spettisbury.

CP4-7 Housing, Housing land, Economy and Retail Provision

2.4.14 The overall approach is reasonable but the numbers are too high.

2.4.15-16 We strongly support increased provision of more Affordable housing generally except in the smallest villages, where need must be justified.

2.4.18-29 Use of brown field land should be increased. The principle of earmarking land for future housing is supported but the various sites proposed require much further justification and we shall contest a number.

2.4.39-45 Similarly with industrial sites we support the principle of earmarking land but will contest some of the sites proposed for the towns.

2.2.59-83 Balanced provision of shops/retail outlets requires intervention and protection. Much more rigorous control of superstores is required; town centre shops have already been seriously damaged. Convenience shops are required in major new housing developments like Shaftesbury East. Village shops are not addressed here but special measures are required to arrest further decline, resulting from superstores and improved roads.

Options

4(1) a Plan for significantly less than 7000 dwellings

4(2) a Deliver high proportion in towns

5(2) c Restrict development on Greenfield land

6 Allocate employment land at B settlements but restrict in line with recommended reduced housing. Encourage non-industrial employment and home working.

7 Retail – Regenerate town centres, encourage convenience stores on major estates and discourage Superstores.

CP 8-10 Housing Mix & Affordable Housing

We think that NDDC should give itself maximum flexibility on housing density. We note that the ‘sense of place’ in historic towns is often due to high housing densities on a small human scale that encourage neighbourliness and a sense of community. It is often this very density together with the shops, cafes etc that it supports that is the attraction for visitors, tourists etc. An example is the area in Blandford between the market place and Bryanston Park. Here, older houses and buildings are interspersed with new buildings, both individual houses and small terraces. The scale and materials used are mostly sympathetic to the older ones, and the newer designs mix happily with the traditional. This results in a pleasantly dense urban area with sporadic parking places that could be a model for other infilling and development in North Dorset’s towns and villages.

Related to this is willingness to impose less than the advisory minimum amount of car parking space. Not everyone has a car, particularly in towns, and not all residents require car parking. We believe that a vibrant and pleasant urban landscape should not be compromised by over provision of car parking.

The need to use so much green field land requires an increase in densities overall. The principle of exception sites is accepted but they need to be individually justified.

We note that there are many villages where development has encroached on and damaged the landscape. In small settlements we favour housing developments on brownfield sites – of which there are a surprising number – but we oppose in particular developments on greenfield sites outside the settlement boundary, that insidiously damage and creep out into the countryside, and set precedents for further building and development.

Moreover, we note that NDDC has already substantially overprovided housing in rural areas and has been criticized for this by the Audit Commission.

Options 8-10 CPRE's favoured options

- Encourage a higher housing density in some selected areas especially close to town and village centres
- Especially, encourage infilling in such areas wherever possible
- Discourage excessive provision for car parking spaces and garages
- The Council should strongly discourage building in rural areas and villages especially where this encroaches on the AONBs.

CP 11 – 13 Transport, Community Facilities & Open Spaces

2.6.9/10 The Axminster rail loop has already been provided, further specific capacity improvements need to be identified. The A303 is largely a dual-carriageway and bypasses towns and villages and its use should be encouraged rather than use of local roads. Research has shown that road capacity can be increased through variable speed restrictions. Traffic overall should be discouraged it is not acceptable to divert traffic over B3081/A30 roads; both of which are of variable quality and pass through residential areas. Noise and unacceptable risks to safety will result. *Generally road improvements should be resisted as they encourage long distance commuting (& increase traffic volumes generally), greater use of superstores (undermining local shops) and undermine public transport.*

2.6.14 The A350/c13 corridor does not merit road improvements, further underlined by the recent refusal of the Westbury bypass. Ref. in 1.2.19 to a Buro Happold report in 2009 suggests that improvements are still under consideration. However, it is clear from this report that traffic volumes are very low by national standards, apart from A303, particularly on A350 between Blandford & Shaftesbury. It is understood that traffic volumes from Poole ferries have fallen in recent months.

Options 11-13

CPRE:

- does not support further road improvement, preferring investment in Public Transport
- supports protection of historic and other open spaces

- believes that community facilities should be determined on a settlement by settlement basis and is opposed to a Hub in Shaftesbury

CP 14 Environment

2.7.11 Implicit downgrading of environmental protection is deplored.

2.7.13 Appropriate conservation projects are strongly supported.

2.7.15/24 Adoption of a unified and simpler heritage protection system suggests a weakening of controls and is to be deplored. Protection of LBs and CAs should be maintained much *more rigidly* than has been the case. Wording needs tightening from 'seek to protect' to 'to protect'. It is not enough for the Council to have regard to the effects of development on historic parks and gardens; they should be formally protected.

Option 14

CPRE places the highest priority on Environmental Protection

CP 15-20 Core Policies for and in relation to Towns & Countryside.

General

Maps & Plans are of poor standard, as compared with earlier plans and those in the SHLAA, 2007, making evaluation and assessment difficult. CPRE requires better mapping of proposals and explanation of the rationale behind site selection. This is not adequately explained.

The Sturminster Newton Town Design Statement is a very professional document, providing a critique of past development and useful guidelines for future development. Its recommendations should be followed and similar documents produced for the other towns before sites are agreed for post 2016 development.

CPRE has had representations on a number of the sites proposed in the various towns for Housing and Industrial Development and does not accept any of the sites proposed without further justification.

Town and village centres require serious study and improvement measures. We should be concerned at a loss of quality shops in towns, to be replaced by charity shops, and village retail facilities generally. The mix of shops in most towns is a matter of concern; the uniform business rate has been damaging and small shops require relief and other assistance. Excessive growth of superstores and road improvements work against town centres by encouraging longer journeys to find a bargain. Shops are also being lost through increasing occupation by solicitors, insurance companies and building societies. It is a fact that while public transport concentrates economic activity the car disperses it unless checked. All town and village centres require 20 mph restrictions and much improved provision for pedestrians. Parking should not be discouraged in these areas as it improves accessibility of shops and reduces speeds. New housing areas should have footpaths, cycle ways & shuttle buses to local town centres.

CP15 Blandford

Housing sites to 2016 are acceptable. Those post 2016 sites proposed in Option 2, favoured by the Council, are *not acceptable*; the other sites considered in Option 1 merit closer examination. Option 2 sites appear to include the Bryanston Deer Park and Lower Bryanston. *Development of these sites would seriously damage the historic riverside setting of the town.* The area of the Deer Park, created by Lord Portman in the 18c, is situated on a majestic curve of the Stour abutting the conservation area, providing unique and historic views of the town. To the south is the cliff, largely wooded, and Bryanston School in a park setting. Lower Bryanston is also of importance given the attractive 18c buildings in St Mary, adjacent to the magnificent gate to the park and topography framing the park of the former Portman estate, much of this area is AONB. At Lower Bryanston the approach to the town with its hilly terrain, AONB and landmark position of Lr Bryanston Fm would be seriously damaged,

The overriding objection to both sites is destruction of historic landscape, providing essentially 18c vistas of a historic town in a riverside setting. There are other objections, including serious damage to AONBs, loss of recreational areas, traffic generation, drainage and flooding.

The town centre is dying as a result of over provision 'of out of town' retail and loss of central accommodation over shops; sensitive measures are required to arrest decline.

Option 15(1)a: No post 2016 expansion of the town

We would favour some smaller scale infilling and intensive development on brownfield sites that may become available. Other large sites need to be justified including those adjacent to the bypass

Option 15(1)c: Expand the town to the south west

We **do not** favour the option of building on the Deer Park or at Lr Bryanston.

CP16 Gillingham

The scale of recent housing development and of that proposed requires urgent steps to ensure closer integration of dwellings, retail sites and transport with improved provision for walking and cycling. This large-scale housing development requires rail improvements, track doubling, and traffic management measures to improve capacity on the A303 possibly to restrict long distance traffic, as a 'sine qua non'. Increased traffic on local roads should be strongly discouraged, particularly B3081/A30.

The proposal for an industrial area at Wyke of some 25 acres is *unacceptable* on environmental grounds and is strongly opposed. It will damage the setting of important listed buildings in Wyke, contrary to policies in 2.7.19. These comprise an historic streetscape and assembly of buildings of different architectural periods of which little else remains or is comparable in Gillingham. There is still industrial space available at Brickfields.

The post 2016 housing sites require further justification. There is insufficient data on which to analyse respective site merits.

The town centre is in decline threatened by peripheral retail development.

Option 16

Restrict to settlement boundary until 2016

Further expansion is not ruled out but Council must justify approach recommended

An Industrial site at Wyke is unnecessary and unacceptable.

Support growth of retail facilities

CP17 Shaftesbury

The post-2016 housing sites require further justification, one site proposed is adjacent to an AONB. The proposed industrial site on the A30 should be screened from the AONB.

Provision of a community hub will be hugely damaging, drawing economic and social activity away from the town centre and existing community centres, arts centre, town hall etc, so undermining their continued existence. It will also generate excessive traffic and parking requirements. (The situation in Shaftesbury is significantly different from that in Sturminster, where the hub has been beneficial.)

An outer bypass for A350 is not required and land should not be protected. It is unrealistic to promote A350 as a major corridor, not least because of refusal of the Westbury bypass. Christy's Lane should be more closely integrated into the town; it should not be a barrier to pedestrians and speed should be restricted to 30 mph.

Option 17

Restrict growth to existing boundaries in view of recent over development on East of town.

Oppose Hub as unnecessary, expensive and damaging to town

CP18 Sturminster Newton

Sturminster Newton's Town Design Statement is to be welcomed, as is the association with the Cittaslow movement and positive approach to their economic and housing development.

Despite this local and community interest in Sturminster, it is a depressing experience to arrive in the town from the north. The buildings in the new town area north of the old railway line, especially those in the cattle market and former station areas, are large scale and of indifferent design with wide roads and generous car parking space more often found on the edges of towns. This part of the little town has no intrinsic character or enjoyable visual identity whatever the benefits for community and commercial use.

It will be noted that the Conservation Area ends abruptly along the line of the former railway. This distinction effectively confirms the marked change in the quality of the urban environment north and south of this line. To the south, the town retains significant historic local interest and quality in its urban environment, whereas to the north the character is ubiquitous and often monotonous, generally lacking in urban quality

– Sturminster Newton Town Design Statement, July 2008, p. 21.

The old town area has suffered from traffic engineering aimed at accommodating the increased traffic generated by the developments to the north. This creates a vulnerable

feel to the market square, with the busy B3092 Bath Road leading north to the developments in the new town and south through a bottleneck due to unlucky historic buildings to the narrow river crossing. An over-wide Market Street, through the recent development is both ugly and pointless in view of other capacity constraints in the town.

The Town Design Statement makes most of the points we would wish to make on development in Sturminster. We strongly support the Design Guidelines that it proposes and agree that:

Critical to the application of this principle must be the exercise of reasonable and balanced judgement in the evolution and consideration of each planning application, weighing often opposing issues of protection and change.

This places considerable demands on the skill and application of both would-be developers and planning authority alike. The view is expressed here that, professionally handled, the balance between protection and change can be successfully managed and that, within the guidance provided by the government, Local Plan policies and the more detailed Design Guidance provided in this Statement, Sturminster Newton can remain a delightful town, further enriched through an ever on-going process of sensitive change and evolution.

– Sturminster Newton Town Design Statement, July 2008, p. 57.

We hope that this document will be taken seriously in future planning decisions and not forgotten under the sheer volume of new plans and policy development.

Option 18

Follow recommendations in Design Statement

CP19 Stalbridge & Larger Villages

The approach is supported in principle but 60 more houses per settlement is too high and housing sites will require justification as and when they arise. Settlement boundaries should be maintained and not altered without adequate justification and consultation. CPRE believes great vigilance is required to safeguard the character of villages and prevent erosion of retail outlets. The Village Design Statement for Child Okeford provides valuable guidance on planning for development in villages. It is a credit to the Council officers and parishioners who prepared it. Interestingly of those parishioners who responded to a questionnaire 45% were opposed to all development and the remaining 55% wanted only very limited development. Similar documents are urgently required for other villages. The scale of the challenge facing planners in improving the quality of development is apparent from this extract from the summary:

In the last seventy years development behind the original village to the natural boundaries has swallowed up agricultural land. This development has not been well managed, in the main badly designed and has added nothing to the original character of the village. The development has been uncontrolled and has resulted in the infrastructure of the village being stretched to the limit. There are only small pockets of infill or replacement of existing buildings left for any potential development. These must be handled extremely carefully. The need for sheltered and affordable housing and the glut of unwanted and unnecessary large detached suburban boxes needs to be recognised by the planners. Anything further buildings in the village must be designed to match their surroundings and the vital village character.

- Child Okeford Village Design Statement

Option 19

Allow limited development with some use of Greenfield land for affordable housing

CP20 Countryside & Smaller Villages

A policy of restraint is supported but small villages are very sensitive and settlement boundaries should be retained, even though there is to be a strong presumption against development. Proposals for reuse of farmyard must ensure that any alternative use is appropriate.

Option 20

Restrict growth and retain settlement boundaries

DM 1-4 Renewable Energy, Transport, Design & Amenity

The presumption should be against large wind turbines; they are inefficient and visually intrusive. Greater emphasis should be given to improving facilities for walking and cycling. Good design should be encouraged and have regard to history, existing built environment and landscape. Open spaces should be protected.

DM 5-9 Tourism, Gypsy sites, Community Facilities, Open Space, Trees, Hedgerows and Landscape

Gypsy sites are sensitive and full consultation on all proposals should be undertaken. Open space should be protected, particularly *historic* landscapes like Bryanston Park, Cliffs and Deer Park, Shaftesbury slopes/Castle Hill etc There should be a presumption against development in AONBs. Industrial and housing development close to AONBs should be avoided.

DM 10-13 Countryside Protection and Improvement

DM 10 This requires strong enforcement to ensure that any replacement buildings, or alterations to existing buildings, are of appropriate quality, character and size. DM 11 Reuse of buildings is desirable only if the building has architectural merit or would obtain planning permission now; not all existing buildings merit retention, particularly 20c buildings. Industrial use may not be suitable where buildings or redundant farmyards are close to housing, lack good access or are visible from AONBs. Home working and sustainable uses should be encouraged. DM 12 Employment sites should not generally be permitted outside settlement boundaries or on unsuitable roads.

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