

*Cranborne Chase & West Wiltshire Downs
Area of Outstanding Natural Beauty*

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Trevor Warwick
Planning Policy Manager
North Dorset District Council
Nordon
Salisbury Road
Blandford DT11 7LL

22 January 2014

Dear Trevor

Pre-submission Local Plan for North Dorset

Thank you for the opportunity for the AONB to comment on your pre-submission document.

The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document and it has been approved by the Secretary of State and was adopted by your Council early in 2009. The AONB and its Management Plan are material considerations in planning.

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

There are many aspects of the Pre Submission Document and the supporting documents that the AONB support. However, in the interests of brevity I will concentrate on those aspects where the AONB has concerns.

1 In addition to the Pre-Submission Document I have also reviewed the available SHLAA material on your website and the Duty to Co-operate Statement. In that latter document I note that the Landscape Character Assessment was modified following a response from this AONB (paragraphs 4.32 to paragraph 4.35). Also in the Duty to Co-operate Statement the Strategic Housing Land Availability Assessment is described in paragraph 4.52 onwards. However it is not clear how the AONB designation was taken into account in that process, and I have been unable to find any greater clarity in the SHLAA documents available online. NDDC's involvement with the Cranborne Chase and West Wiltshire Downs AONB Partnership is set out in paragraph 5.68 onwards. The acknowledgement in paragraph 5.72 that AONB Management Plans are a material consideration in the planning process is appreciated. However, I note that the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty is not included in the list of bodies in Appendix A which relates to the Duty to Co-operate on cross Border Issues.

2 Turning to the North Dorset Local Plan Part 1 Pre Submission Document, this AONB is concerned that there are some errors in the mapping which could lead to confusion. These are set out in my email of 15th January 2014 and that is attached for ease of reference.

3 In connection with Policy 1, the extensive discussion on the NPPF, paragraph 3.4 onwards, the significance of footnote 9 to paragraph 14 is inadequately covered. That means that Policy 1 does not take into account the clear indication in the Framework that there should be specific policies for those topic areas indicated in footnote 9.

4 Clarifying to all readers in paragraph 3.7 that management plans for the Areas of Outstanding Natural Beauty are material planning considerations is helpful and removes a potential area of misunderstanding.

5 Landscape is more holistic in concept and reality than the 'Natural Environment' (page 50-55). It embraces historic and cultural associations in addition to geology, topography, and wildlife. It would provide greater clarity to the Local Plan if there were separate policy sections for Landscape, Wildlife, and the Historic Environment. That would also enable the weight being given to the topics to be more readily identified and appreciated. In the case of the AONBs it could serve to emphasise the national importance and local stewardship of these landscapes.

6 In paragraph 4.58 relating to Areas of Outstanding Natural Beauty the primary purpose of AONB designation is correctly set out. However there is no secondary purpose of designation in the CRoW Act and therefore the statement that there is 'the secondary purpose to increase the understanding, enjoyment of the special qualities of the area' is incorrect.

7 4.59 omits reference to exceptional circumstances which is a key aspect of NPPF paragraph 116.

8 In 4.61, final sentence, I suggest you change 'are the main employers' to 'are major employers'.

9 I also note in paragraph 4.64 in connection with decisions on development proposals and the AONB Management Plans that the Pre Submission Document states it will 'have regard to the objectives included in the two Management Plans. Nevertheless 'have regard to' was found to be insufficiently clear or robust in connection with the Wiltshire Council Core Strategy at its EiP. There it was agreed to amend the relevant text to read
'proposals for development within or affecting the Areas of Outstanding Natural Beauty.....shall demonstrate that they have taken account of the objectives, policies, and actions set out in the relevant Management Plans of those areas'.

In that way the emphasis is put on the applicant to demonstrate achievement and compliance with AONB objectives rather than the planning authority having to tease out whether or not that has been done. This AONB **recommends** including that wording in the North Dorset Local Plan.

10 Turning to page 66 and the actual Policy 4, in Landscape Character there is a typographic error in the 4th line and the acronym for area of outstanding natural beauty is incorrect. The policy itself seems to be worded in a remarkably circular way that does not provide any particularly robust guidance or criteria against which to operate development management easily. To provide a clear policy I would suggest the following wording

'within the areas designated as AONBs, and their settings, development will be managed in order to conserve and enhance the natural beauty of the area. Development proposals will need to demonstrate that they have taken account of the objectives, policies, and actions of the AONB Management Plans'

11 North Dorset District Council has adopted the Management Plan for this AONB and there is a policy in there about the provision of parking to encourage the use of public transport. That policy seeks to help with the difficult situation that exists in rural areas where the population is dispersed over a large area and realistically covering such a dispersed population by public transport is not practical or financially feasible. Nevertheless providing locations where affordable parking of personal vehicles can be done at the main routes that are used by public transport is seen as a way of encouraging people out of their personal transport and onto public transport. Particular examples of this are the Tarrant and Gussage valleys where parking beside the A354 would provide an opportunity for people just to make the short journey along the valley, park up, and then catch the bus either to Blandford or Salisbury as appropriate rather than using their cars. This AONB recommends Section 10, Policy 23 could, with benefit, be amended to cover these situations.

12 In connection with permitted development rights within section 10 there appears to be an error in the second sentence of paragraph 10.158.

13 It is noticeable that a considerable amount of emphasis is put in the Plan to the preparation of Neighbourhood Plans as an alternative to 'opting in' to Part 2 of the Plan, which appears to be a site allocations document. This AONB would advise that the duty of regard to the purposes of AONB designation in section 85 of the Crow Act 2000 would apply to, for example, parishes and parish councillors involved in those Neighbourhood Plans.

14 The AONB is **concerned** that the Plan as it currently stands is **not sound**. This is because it does not follow the guidance in the NPPF that there should be special policies for the AONBs to indicate how planning matters will be handled differently in these nationally designated areas from undesignated areas of countryside. A similar situation was found with the Wiltshire Core Strategy and I note there has been co-operation with Wiltshire in the preparation of your Plan in your Statement of Duty to Co-operate. In connection with the Wiltshire EiP. It was noted that:

- paragraph 17 of the NPPF, 5th bullet point, is quite clear that planning needs to take account of different areas as well as the intrinsic character of the beauty of the countryside, whilst bullet point 7 focuses on conserving and enhancing natural environment. That particular bullet point is quite clear that 'allocations for land for development should prefer land of less environmental value'. Clearly the AONBs are land of highest environmental value.
- Paragraph 109 of the NPPF, bullet point 1, refers specifically to enhancing valued landscapes and, of course, AONBs fall into that category at the highest level.
- paragraph 110 is similarly clear that plans should allocate land with the least environmental amenity value.
- Paragraph 113 indicates that criteria based policies should be established for landscape areas and that distinction should be made between the hierarchy of international, national, and locally designated sites. That is followed by paragraph 115 where AONBs are given the highest level of protection in relation to landscape and scenic beauty, and paragraph 116 indicates that major developments should be refused in these areas except in both exceptional circumstances and where they can be demonstrated to be in the public interest.

The overall thrust of the NPPF, and this has been a valid consideration at other EiPs, is that a Local Plan or Core Strategy should have policies that indicate how development will be dealt with differently in AONBs compared with undesignated countryside.

15 It appears that the Local Plan has only one strategic allocation for housing and employment land, and that is at Gillingham. The rest of the development in the Plan period is only shown indicatively at the four major towns with the remaining 'at least 230' housing units at unspecified locations elsewhere within the District.

17 I note from table 6.1 that more than sufficient employment land has already been identified for the period to 2026 and therefore the pre-submission plan does not identify additional employment land.

18 Paragraph 8.106 (Shaftesbury) should include the AONB in the designations.

19 Paragraph 10.84 (footnote 328) could include this AONB's Position Statement on Light Pollution.

20 In consultation with the Dorset AONB this AONB notes their proposed detailed amendments and supports the proposed changes to 2.50(i), 4.42, 4.43, 4.56, 4.60, 4.63, 4.65, 8.18, 8.23, 10.18, 10.15 – 10.19, Policy 22, and Policy 32.

21 Linking to the Dorset AONB's suggestion for the inclusion of their special qualities in paragraph 4.62, the following could be a parallel statement of special qualities of this AONB to be included in paragraph 4.61.

The birthground of modern archaeology, Cranborne Chase and West Wiltshire Downs is deeply rural and tranquil. It is largely unspoilt and aesthetically pleasing, of great ecological and cultural importance, and characterised by extensive land holdings, panoramic views over rolling chalkdowns, enclosed wooded vales, steep escarpments, level farmed terraces, and elevated woodlands.

I hope these comments are helpful to you and the AONB would, of course, be happy to comment on any of them with you.

Yours sincerely



Richard Burden
Landscape and Planning Advisor (part-time Monday – Wednesday)

On behalf of the CCWWD AONB Partnership

richardburden@cranbornechase.org.uk

ENCS: email dated 15th January 2014

Sandip Mahajan (Planning Policy)

From: Trevor Warrick
Sent: 17 February 2014 16:17
To: PlanningPolicy
Subject: (SANDIP HAS PRINTED FOR THE CONSULTATION RESPONSE BOX) FW: Local Plan Consultation - Maps [Scanned]
Attachments: blandford_aonb boundary.jpg

See previous e-mail re: boundaries.

Trevor Warrick

Planning Policy Manager

North Dorset District Council

Email: twarrick@north-dorset.gov.uk

Direct line: 01258 484211

From: Richard Burden [mailto:Richard.Burden@north-dorset.gov.uk]
Sent: 15 January 2014 18:00
To: Trevor Warrick
Cc: Shirley Merrick; Linda Nunn
Subject: Local Plan Consultation - Maps [Scanned]

Hello Trevor and a happy new year.

Whilst reviewing your pre-submission draft Local Plan in preparing to respond to the consultation I have spotted some mapping discrepancies / areas for confusion and thought it might be helpful to let you know about those straightaway.

Figure 8.1 Blandford Inset Diagram. Whilst I appreciate this is diagrammatic the extent of this AONB within the area enclosed by the bypass is significantly less than it should be to the north [east of site 11] and to the east [between the bypass and Black Lane]. I attach a plan showing the AONB boundary to assist your cartographer.

Figure 8.3 Shaftesbury Inset diagram. Similarly the extent of the AONB seems to be understated. So as not to block your inbox I am attaching an AONB boundary map to a separate email.

There are also some AONB issues with a few of the village inset maps which are included with the Plan to show the removal of the settlement boundary.

9 Compton Abbas: Whilst the majority of the settlement is actually within the AONB it is shown as not included. To avoid any potential misunderstandings that factual inaccuracy should be corrected.

22 Iwerne Minster: Similarly most of the settlement is actually within the AONB but it is not shown as included. To avoid any potential misunderstandings that factual inaccuracy should be corrected.

Farnham 12 and Tarrant Gunville 49: The Area of Outstanding Natural Beauty acronym should be shown correctly in the key.

I hope this is helpful

Regards

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Landscape and Planning Advisor (part-time, Mon-Wed)

Cranborne Chase Area of Outstanding Natural Beauty

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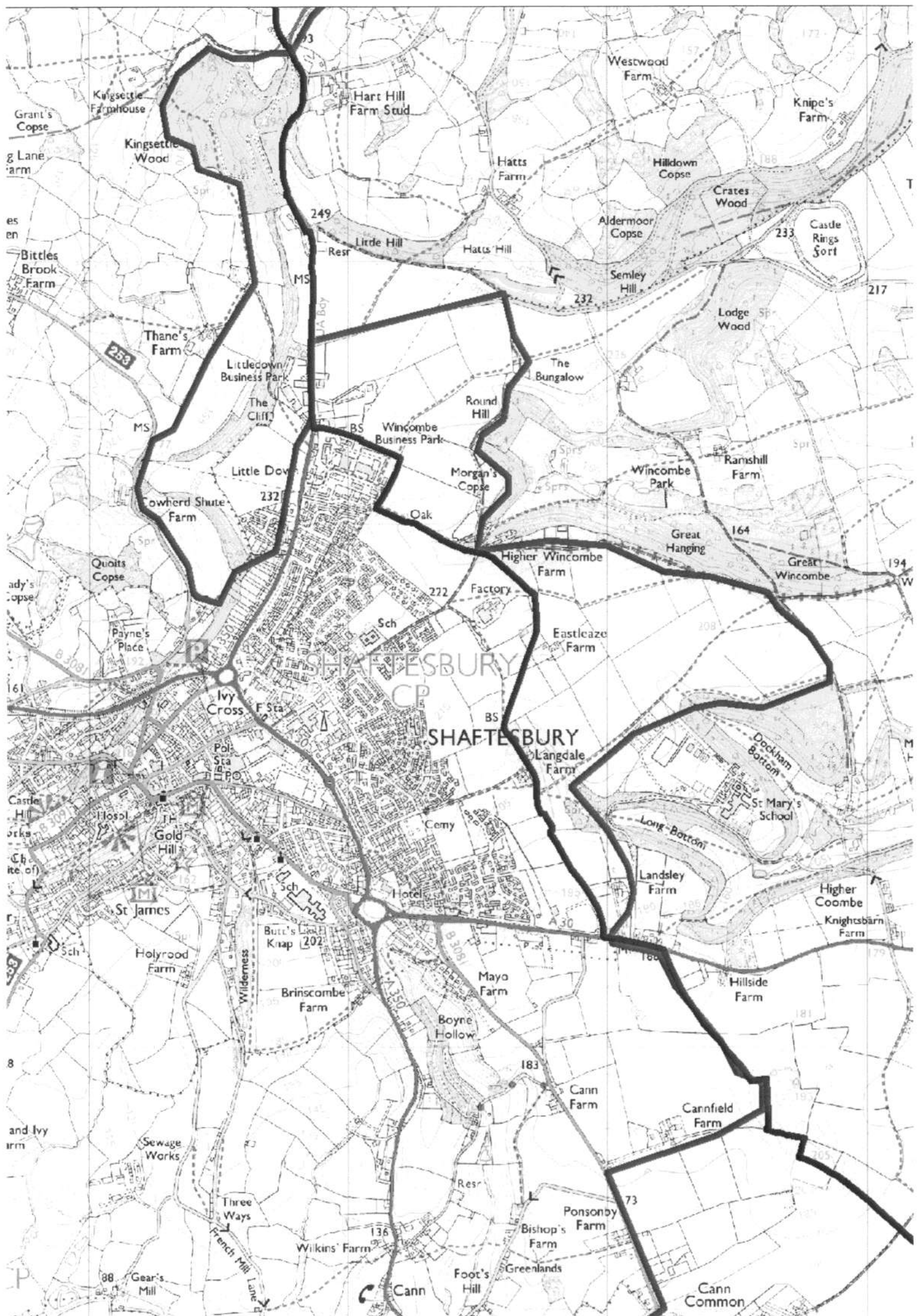
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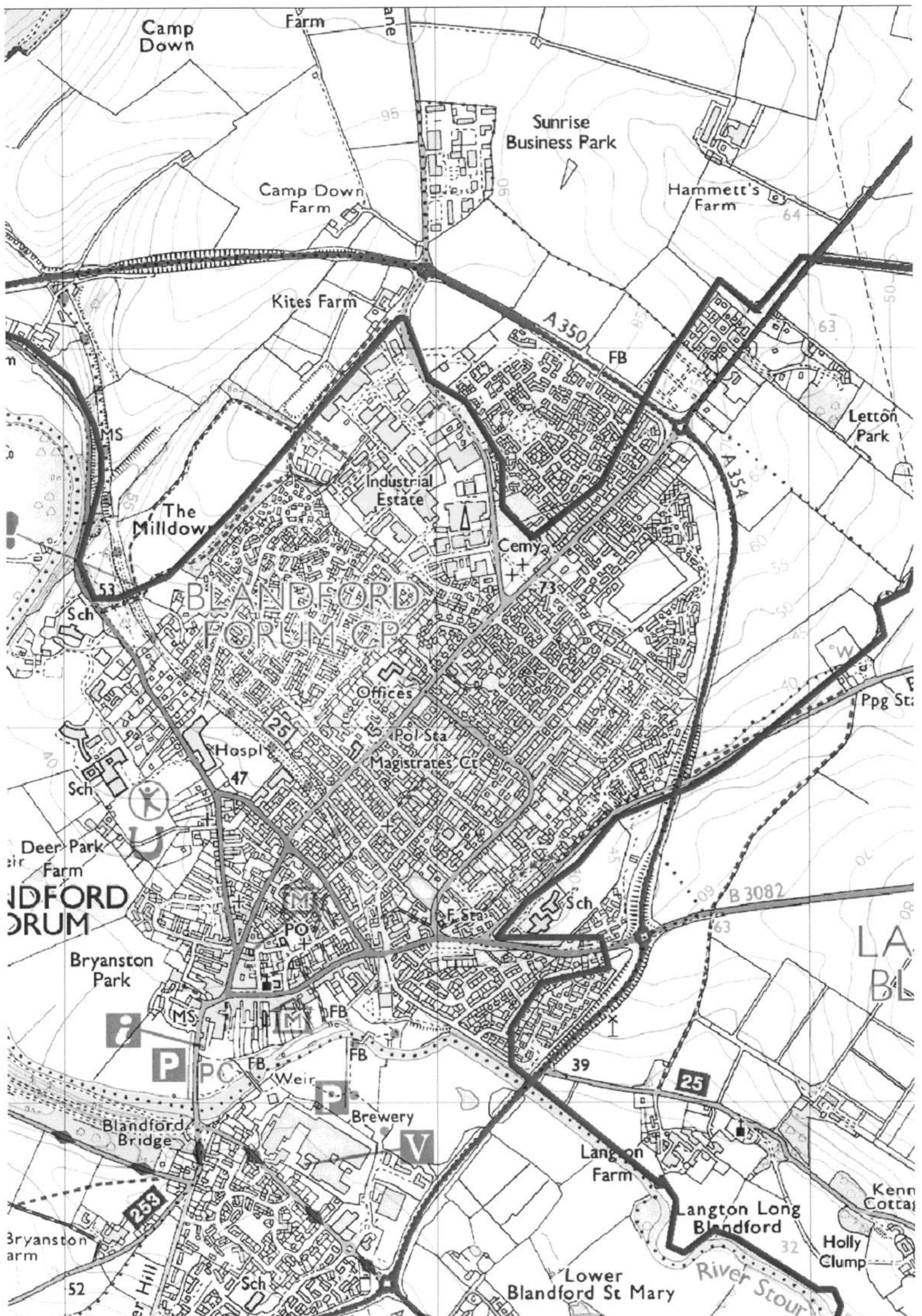
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Camp Down

Farm

Sunrise Business Park

Camp Down Farm

Hammett's Farm

Kites Farm

A 350

FB

Letton Park

The Milldown

Industrial Estate

Cemy

BLANDFORD FORUM CP

Offices

Pol Sta

Magistrates Ct

Hospl

Sch

Sch

Deer Park Farm

BLANDFORD FORUM

Bryanston Park

PO

Sch

B 3082

LA BL

MS

P

FB

Weir

Brewery

Langton Farm

25

Langton Long Blandford

Kenn Cottag

Holly Clump

Bryanston arm

52

er Hill

Sch

Lower Blandford St Mary

River Stour

