

Dorchester-on-Thames Neighbourhood Plan

Examiner's Clarification Note – Responses (bold script)

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I visited the Plan area yesterday. I am now in a position to raise initial issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions. I set out specific policy clarification points below in the order in which they appear in the submitted Plan:

Policy DOT3

On what basis were the important views in Appendix 1 and 2 identified?

How do they contribute towards the setting of heritage assets (as identified in the second part of the policy)?

The starting point was the appraisal maps which accompanied the character studies for the designated conservation areas and which identified important views in, out and around the areas. These were all carefully assessed on the ground and it became clear that there were other important views which were essential to the overall character of the conservation areas which had not been identified. Within the historic built area of the village that character embraces a variety of open areas that contribute to the essential setting of the designated heritage assets. The surrounding open landscape and its distinctive features such as the Dyke Hills, the green lanes and both the River Thames and the River Thame define the setting of the village. The absence of a specific reference to some of these views on the appraisal maps might be taken to mean that they are not of significance and it was therefore considered to be necessary to indicate their importance by a more comprehensive survey.

In particular for Dorchester these included views out into the open countryside at specific locations along Watling Lane, Wittenham Lane, Bridge End and at the north eastern end of Manor Farm Road. Further views inwards across the open area of the allotments and the adjacent farmland and of the Abbey across the Cloister Garden were also identified.

The open views across the Hurst in the Overy conservation area and over Bridge Meadow were also identified as being inadequately recognised on the appraisal map.

The policy needs to be read in conjunction with the appraisal maps as set out in the first part. These identify the heritage assets which include the conservation areas in their totality as well as the individual features within them. Any development proposal must demonstrate that it does not compromise the integrity of the heritage areas in all their many facets including views, important trees, walls and the setting of listed buildings and those buildings on the proposed local list. In line with the advice that we have received, the policy has been framed in a positive rather than negative spirit.

Policy DOT4

On what basis is the 20 metres distance threshold included in the second criterion of the policy?

The policy conforms with Policy ENV 4 Watercourses, of the emerging SODC Local Plan. In particular “Development should include a minimum 10m buffer zone along both sides of the watercourse to create a corridor favourable to the enhancement of biodiversity.

Development which is located within 20m of a watercourse will require a construction management plan to be agreed with the council before commencement of work to ensure that the watercourse will be satisfactorily protected from damage, disturbance or pollution”

Policy DOT4 also specifically supports an objective of the River Thame Conservation Trust to create a wildlife corridor along the River Thame. Within Dorchester Parish this links the Earth Trust (on the southern bank of the River Thames) to land owned by the Hurst Water Meadow Trust along one bank of the River Thame and links to other wildlife areas on the river further north. This is mentioned in 4.2.3 of the Plan.

In addition, the River Thames and River Thame are both classified as Main rivers and EA regulation has been in place for some time “consent under the Water Resources Act 1991 is required from the Thames Region of the Environment Agency for any works in, over, under or within 8 metres of a main river. Footbridges, tree planting, fences, bank repair and restoration, or even digging a ditch all therefore need consent. “Early consultation with the Environment Agency is recommended.”

Policy DOT7

In the context of this policy what is meant by:

- ‘Alternative land uses’
- the ‘policies map’
- ‘agricultural employment opportunities’

In reading this policy I am not absolutely clear on its purpose. Is its primary purpose to retain and safeguard agricultural land as shown in Map 6?

For “Alternative” land uses, please read “Agricultural land uses in the areas” this is an error mistakenly carried forward from a previous version of the Plan. The Policy Map referred to in Policy DOT7 is Map 6 - Agricultural Land Categories. The principle purpose is to retain and safeguard agricultural land as it is a non renewable resource and greatly contributes to the rural character of the village. In addition, there are relatively few and a diminishing number of employment opportunities in Dorchester. By protecting the agricultural land an objective is to retain the agricultural employment opportunities.

This Policy contributes to Objective 4 of 4.2.1 of the plan.

Policies DOT8/9

Do the policies have regard to national policy on Green Belts in general, and paragraph 89 of the NPPF in particular? As submitted policy DOT8 in particular reads that built development will be acceptable where it does not offend Green belt policy rather than to adopt a restrictive Green Belt approach and then identify potential exceptions.

Is the allocation of affordable housing a land use matter?

Context

Throughout the development of the plan, the issue of housing, given washed over green belt status and the sensitivity of the historic village environment, has been the most difficult to address. This is in the context of a lack locally of smaller dwellings, and of affordable housing . (Since the report was written the local housing association has received planning consent to demolish 11 one and two person social housing dwellings and construct four larger detached market houses).

Earlier in the plan development process there were suggestions from sources in SODC that the NDP should identify potential ‘Rural Exception Sites’. Eventually it was decided that identifying specific sites within the NDP would mean that by definition they couldn’t be considered ‘exceptions’, and this would be tantamount to allocating housing sites, which would not be within the spirit or letter of NPPF para 89.

However the intention of policies DoT 8/9 is to try and address the need for smaller dwellings and affordable housing, while fully respecting the green belt designation, and maintaining the special character of the village, which make it such a desirable (and expensive!) place to live.

In short to maintain Dorchester both as a place with a special character and appearance, and as balanced community.

Comment DoT 8/9

Paragraph 89 of the NPPF states that the construction of new buildings in the Green Belt should be regarded as ‘inappropriate’, but goes on to give some exceptions. The exception that is most relevant to DOT 8/9 is:

“Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan”

The intention of DOT8 is to recognise that some small scale infill could be appropriate, but there need to be a number of caveats, including respecting the Green Belt designation, respecting local character and favouring smaller, one two and three bedroom dwellings. It also references the SODC definition of infill as ‘small gap in an otherwise built-up frontage’.

There is clearly a decision to be made in how negatively or positively these policies are phrased. Indeed earlier drafts of the policies expressed a more restrictive green belt approach. That was eventually changed to the more positive wording now proposed, so as to signal that some smaller and/or affordable housing to meet local need, with all of the provisos, would be welcome.

But we do recognise that there is a judgement to be made about whether the current wording is too permissive of development, and whether a more restrictive wording might achieve the same result without running the risk of compromising the green belt.

We also recognise that in reality there are unlikely to be ‘infill’ schemes of more than 11 dwellings, given the green belt designation and SODC Core Strategy. The Core Strategy policy CSR1 talks about infill sites within ‘smaller villages’ such as Dorchester being up to 0.2 ha, equivalent to 5-6 dwellings. However we also note that the latest SODC local

plan October 2017 version does not specify site sizes for housing in smaller villages (Policy H8)

The final section of DoT 8 concerns the redevelopment of existing social or affordable housing sites, and is intended to preserve the very limited provision that currently exists. This section relates to what is now SODC Emerging Local Plan 2011-33, October 2017 policy CF1: ‘Safeguarding Community Facilities’. CF1 restricts the loss of community facilities:

“A community facility or service may be essential, ... because it is one of a limited number of that nature in a settlement or area...”

This policy is referred to on p 40 of the NDP supporting text. We considered that affordable housing should be considered as an essential community facility within the definitions of SODC policy CF1.

Comment DoT 9

As mentioned above, para 89 of the NPPF covers ‘limited affordable housing for local community needs’, and the Glossary on p55 expands this by noting that: *‘rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.’*

We considered therefore that a section of the NPPF specifically defines a group of people for whom exceptional provision in the Green Belt could be made. The policy as proposed was intended to define more precisely that local connection in the context of Dorchester.

However we recognise that it would be possible to put this information into the supporting text rather than the policy itself.

Policy DOT11

Are there specific reasons why this policy is specific to the conservation area?

Is its purpose to ensure that the delivery of the required number of parking spaces to development plan standards is appropriate and sensitive to the character and appearance of the conservation area?

The Dorchester Conservation Area defines the area that has the biggest issues with parking and movement, and where on-street parking and associated congestion has detrimental effect on the character of the conservation area. This is because the Conservation Area covers the main historic core of the village, much of which is characterised by housing built before the car age, and with little off-street parking available. There is therefore a significant demand for on-street parking from residents. The area also contains a concentration of uses that generate traffic, such as the school, the shop, the pubs and café. The policy is intended to try and ensure that any development in the area doesn’t make the situation worse, as well as ensuring as suggested that parking provision is appropriate and sensitive to the character and appearance of the conservation area.

The areas outside the conservation area are on the whole more recently developed, with off-street parking, and do not face the same parking and congestion issues.

Policy DOT15

How does this policy have regard to national policy on Green Belts?

Over a number of years the village has seen many of its long-standing commercial premises, predominately Retail (shops, Post Office) and Social (public houses), but also to a lesser extent Agricultural, transfer to residential use. The purpose of policy DOT15 is to encourage development proposals to enhance retail facilities, facilitate home working (for example by providing improved internet and other communication links) and create employment opportunities in line with NPPF guidelines, particularly in relation to:

- **buildings connected with agriculture,**
- **alterations or extensions to, or the replacement of existing buildings,**
- **the redevelopment of any brownfield site.**

Are its first and second sentences potentially in conflict?

DOT15 refers in its final sentence to impact on the village's character and natural environment. As such the content of the first sentence is intended to be interpreted as conditional upon rather than in conflict with the second sentence.

Does the second sentence need a degree of clarification so that its intentions can be applied consistently by the District Council throughout the Plan period?

At the heart of the village's character and natural environment which this policy is intended to protect is:

- **its history, much of which is clearly evidenced in its listed buildings and surrounding landscape,**
- **Dorchester Abbey, together with its related buildings and cloister garden,**
- **its outward and inward views, which have been separately and individually identified in the detail of the Plan,**
- **its thriving local community.**