

WMTC Response to Dorset Council's Draft Local Plan

1. Introductory Comments

Wimborne Minster Town Council (WMTC) is unable to support the draft Dorset Council Local Plan in its current form. These introductory comments give an overview of the reasons why and the following sections provide more detail and background to support those reasons. If required, detailed base data that links to specific wording, para/page numbers in the Plan or evidence documents can be provided for Dorset Council's reference.

The draft Plan contains numerous erroneous, contradictory, and out of date material. Whilst undoubtedly a great deal of work has gone into such a large project, so long as significant errors contained within the documents still exist, the recommendations/ proposals within it are clearly unreliable and cannot be justified. An appendix of factual inaccuracies is attached to this report.

Particularly concerning and hugely significant examples are:

- the stated population for Wimborne and Colehill varies from 8,700 to 13,300 in supporting documentation, both are under assessed; and
- that Wimborne Minster has an Upper School (QE School is not actually within the parish of Wimborne Minster but in the adjoining Parish of Pamphill which is in walking distance from the Town).

This throws doubt on the validity of all the proposals. It is with great concern that claims can be made which are clearly untrue/ unachievable such as the suggestion that if WMC 6 goes ahead it will take 15 minutes by public transport from Wimborne to Dorchester!

There are omissions and inconsistencies within the Plan including the absence of a Council-wide spatial and transport strategy, Strategic Housing Needs Assessment, Retail Study and Town Centre Needs Assessment amongst other key documentation. It lacks credibility and up-to-date evidence and this needs to be addressed.

Further to this, the Plan shows little understanding of the population, the locality, the transport issues, or the topography of Wimborne Minster and appears to be merely a copy and paste exercise from the previous Christchurch and East Dorset Core Strategy which is clearly no longer relevant given that it has not been updated to reflect the current situation e.g., LGR and boundary changes. It does not capitalise on opportunities within the new Council 'geographical area' and fails to explore more sustainable, alternative options for development.

The Plan fails to demonstrate any co-operation with neighbouring authorities in respect of the available brown field sites which could accommodate further housing before development of any Green Belt. It also disregards other potential and approved developments which will impact on Wimborne Minster e.g., Land North of Merley (650 homes proposed) and those on Magna Road, both in the BCP area.

We note that Wimborne Minster and Colehill have been combined as "one" for the purpose of this Plan; this is strongly resisted by WMTC. To this end, WMTC strongly objects to the removal of the Green Belt under WMC 6, 7, 8 and 9. These are the last remaining sites separating Wimborne Minster from Colehill and should be protected to prevent further urban sprawl. Wimborne Minster has more than contributed its fair share towards Dorset's housing supply (losing approximately 70% of its Green Belt land to do so). Dorset Council's draft Local Plan has shown no regard to, nor recognition of, the local circumstances and development already delivered within Wimborne Minster or the need to protect the remaining Green Belt.

The impact of the COVID-19 pandemic has not been adequately factored into the draft Local Plan, although a number of Dorset Council 'evidence' documents clearly demonstrate an awareness of this matter i.e., potential for lifestyle changes that could in the longer term have an impact on the demand for housing, travel and employment. It is evident that people's working patterns have changed. All objective planners will have realised that COVID-19 has accelerated an already visible change in work patterns and business models. It is clear that increasing numbers of people are working from home, and that there will be a reduction in commuting and office working for the foreseeable future. With this, there appears to have been an increase in people adopting more healthier lifestyles and opting to use more sustainable modes of transport e.g., walking and cycling. This could have a fundamental impact on overall housing (not just employment) needs, both locally and nationally and this needs to be addressed in the next iteration of the Plan.

2. Development Strategy

Reference is made to the Government's 'standard method' when calculating future housing needs. However, the current planning system is being reviewed and will be updated. How can there be any meaningful consideration of the Plan if the method and calculations of housing numbers is likely to be changed? Further to this, the recent Government response to the consultation on the methodology (December 2020) makes clear that the derived housing numbers are a starting point and can be varied (taking into account local circumstances and constraints as well as the strong need to protect the Green Belt).

The Local Plan target is to build 39,285 houses, (excluding possible further development in Alderholt, Gillingham and Wool), in the period to 2038 - an additional 8,804 homes more than the Government's target based on the standard methodology. WMTC would query Dorset Council's overambitious, rigid and inflexible application of the methodology given the current Government review of the Planning System and possible changes to projected housing number calculations. It is not clear why there is a need to plan for excess housing in the Dorset area. Is the excess intended to meet a deficit from the BCP conurbation or to mitigate in the event of the failure to deliver a major allocation?

There is no evidence that the subject of new settlements has been considered on a strategic basis with the neighbouring authorities of BCP and New Forest. This is of concern, especially given BCP Council's potential housing needs. Furthermore, there does not appear to have been any cooperation with neighbouring authorities in respect of the available brown field sites which could accommodate further housing before development of any Green Belt. It is imperative that 'all other reasonable options' for accommodating growth should be fully examined and exhausted before considering any changes to Green Belt boundaries. There is no clear evidence or justification of this in the Plan particularly for Wimborne/ Colehill and this failure to provide clear and convincing justification for harm to heritage assets including conservation areas, protected landscapes and scheduled monuments is contrary to para 193 of the NPPF.

WMTC understands that New Forest District Council (NFDC) has finalised its Local Plan and that NFDC states that it is not in a position to offer to help out BCP Council by taking some of its target number. Given that Dorset Council's Local Plan is already proposing the release of Green Belt land, it would appear reasonable to state that Dorset too faces challenges in terms of meeting its own housing needs and would also not be able to accommodate the unmet need from the conurbation.

There should be no expectation for Dorset Council to exceed its housing target, and further consideration should be given as to whether the housing needs can be met in full given the environmental constraints. Sites that would not contribute towards sustainable development

should be removed from the Plan. Furthermore, WMTC requests that Dorset Council carries out additional research on local housing needs to establish the type and amount of housing that is needed in each area, to accurately determine housing figures and how this might differ from the standard methodology.

WMTC would concur that to reflect national policy, neighbourhood plans should be prepared to positively contribute to the Local Plan's Vision and Strategic Priorities.

On balance, WMTC would be minded to support the establishment of a new settlement. However, it is important that proper infrastructure is put in place to ensure that it can cope with future expansion. WMTC acknowledges that the details of new settlements are beyond the scope of the current Plan, but a strategic assessment of the most appropriate locations should form part of the overall spatial and transport strategy. WMTC raises concern that the current Plan simply invites landowners and developers to put forward their proposals for consideration at some future date rather than determining the siting of possible new settlements within a strategic context.

Dorset Council's draft Local Plan has shown no regard to, nor recognition of local circumstances, development already delivered within Wimborne Minster or the need to protect the remaining Green Belt. This must be reviewed.

3. Environment and Climate Change

The loss of mature natural Green Belt land rich with biodiversity will have a detrimental impact on both the local and wider natural environment. Up to 150 species of animal and plant life are lost every day. WMTC does not consider SANGS to be an adequate or suitable replacement. Walking in an urbanised area with limited wildlife is not comparable to open countryside. Furthermore, the development of Green Belt land is in direct contradiction to many statements made about a desire to protect rich, biodiverse, heritage green spaces, and positive impact to wellbeing. WMTC does not support the statement that developing on Green Belt and building green infrastructure/spaces will result in "net gains to biodiversity".

WMTC strongly believes that the wellbeing of residents will be dramatically disadvantaged should the developments as detailed in the Local Plan proceed in addition to the existing housing developments that are underway, and yet to be completed, in and around Wimborne Minster.

An extensive site investigation is required in Wimborne Minster, particularly for the sites identified for housing (WMC 6, 7, 8 and 9). This includes the need for up-to-date information on flooding, protection of ground water sources, sewage disposal capacity and other essential services which are not currently publicly available.

It would be inappropriate to use 'Sustainable Drainage Systems (SuDs)' at the sites proposed in Wimborne and Colehill due to the "insufficiently permeable soil" which is already causing nearby residents' gardens and driveways to flood. An inability to make use of SuDs would mean the proposed development, "particularly on greenfield sites" would increase water flow rates and the probability of flooding. As fields, driveways, gardens, are already flooding, and the underground springs are already flooding fields, releasing Wimborne's Green Belt land for development would magnify existing flooding and increase the impact to existing residents. Several residents have contacted WMTC to provide visual evidence of the existing flooding that occurs within their property and to confer the negative impact this has on their general wellbeing. Further development will exacerbate these issues.

As of 15 January 2021, the boundaries of the Flood Plains have recently been extended. While it is appreciated this was only a short time before the release of this Consultation, the updated Zones

need to be included and taken into strong consideration before release of the next Consultation. In 2021, the River Stour has been level with the banks and has overflowed onto the land in some areas. Whilst it is recognised that this is not significant flooding, localised water ingress is a concern and often renders public footpaths impassable for weeks on end. It is not known how this issue will be affected by developments currently under construction, let alone the impact from the new housing developments proposed for Wimborne Minster and Colehill.

Dorset Council needs to provide clear evidence that building at sites WMC 6, 7, 8 and 9 would not increase flooding elsewhere or further exacerbate the flooding experienced in the neighbouring areas and properties.

Furthermore, Dorset Council must provide the criteria and reports to:

- justify the decision to declare “exceptional circumstances” to change the Green Belt boundaries. Work undertaken by the former District Council stated that “Wimborne has seen a number of recent developments and so it was felt inappropriate to major on the area for the next phase” (Planning Policy Officer presentation, 2/3/2018) and that only as a last resort should Green Belt land be released.
- prove the exhaustive search for alternative areas to develop that are not Green Belt to include up to date brownfield site acreage, e.g., Pippins, an up-to-date number of empty dwellings suitable for retrofit, information on how office buildings are being converted into homes, e.g., above Barclays, and the Wimborne Market development.
- show consideration has been given to the impact of the housing developments currently underway in and around Wimborne Minster. It will not be possible to achieve an accurate impact assessment of how another proposed development (WMC 6) will impact traffic congestion, air quality, demand for schools and doctors until at least one year after all the approved homes have been built and occupied. Further to this, the 2011 Saturn Transport Survey detailed a tolerance threshold of 1300 new homes for the area (existing infrastructure would be at 95% capacity at this level). Dorset Council has underestimated the current number of dwellings proposed in the area, which is now circa 1500 new homes. This figure exceeds the tolerance level identified in the Saturn Survey and it must now to be reassessed and no further developments approved.
- prove that adding to existing settlements increases the use of sustainable public transport and reduces the number of car journeys, through uptake of public transport, cycling and walking.
- provide actual evidence for claiming ‘sustainable development’ (including an explanation of the economic, social, and environmental objectives - as the three spheres are currently detailed, they do not support one another in “mutually supportive ways” instead they are mutually exclusive and therefore cannot be deemed sustainable). Claiming “sustainable development” under this definition and with conventional methods of construction is, in the opinion of WMTC, “greenwashing”.

The Plan identifies that Dorset is a desirable tourist destination due to coast, countryside, and rural villages. However, there is no acknowledgement of how the natural environments surrounding historic towns and communities contribute to the “character” and “setting” of Dorset’s idyllic destinations. These would significantly add to the draw of tourists to the area and the subsequent £1.8bn per annum which tourism contributes to the economy.

WMTC believes that a major contradiction within the Plan is that it highlights the resonance between climate change and “degradation of the natural environment” yet proposes to build on the Green Belt – land specifically designated to prevent land degradation/loss of diversity with green corridors and preventing urban sprawl.

4. Housing

Wimborne Minster is an historic town dating back to Saxon times accessed by three ancient bridges with a narrow network of 13th and 14th Century streets in the Town Centre. The Town has already sacrificed approximately 70% of its Green Belt areas for new housing development.

Three major developments have been underway since 2015:

- WMC4 - Cranborne Road (approx. 630 homes)
- WMC3 - Cuthbury (220 homes)
- WMC5 - Land South of Leigh Road/Parmiter Drive (350 homes)

WMTC would like clarity on whether the figure referred to in WMC5 includes proposed dwellings at Parmiter/ Saxonbury, Park Farm and Quarterjack Park which according to WMTC’s calculations total 560 not 350 dwellings.

WMTC requests that the new Local Plan document details up-to-date and accurate figures of the number of dwellings currently proposed for Wimborne Minster. WMTC believes this is now in the region of 1500 new dwellings.

Housing developments are also planned at the nearby Furzehill site and the Wimborne Market site. Many of these homes are still to be built. Already roads are congested, and local services appear to be stretched. WMTC is yet to understand the full impact until the remaining developments are completed.

WMTC would want to see an updated realistic traffic flow and modelling project undertaken after the existing developments are complete and before any additional homes are proposed. The 2011 Saturn Transport Survey covers up to the year 2026 but WMTC believes this is now outdated due to the fact it was based on a maximum capacity of approximately 1300 new dwellings in the area (WMTC believes this is now more than 1500 dwellings). WMTC is not aware of any recent traffic flow modelling data conducted by Dorset Council nor knowledge of it being used to inform this Local Plan.

Many of the recent new builds around Wimborne Minster are unaffordable to local people and therefore likely to be purchased and occupied by people from outside of Dorset. There are no criteria to provide the proposed new houses for the people of Dorset which contradicts *Figure 6.1. The role of the local plan “The Local Plan can help to deliver Economic Growth by enabling sustainable economic development in the right locations and providing homes for those who work in the area.”* And the CPRE *“The plan should offer local homes for local people, including truly affordable homes. And it should respect and protect Dorset’s environment, our greatest economic asset. The future health of everyone as well as our economy depends on this.”*

WMTC would like to see agreed criterion to ensure that the houses still to be built in the ongoing developments in Wimborne, and any future developments, will have a proportion of homes that can be allocated to local people in Dorset only - to address the housing needs of Dorset. Such ‘local connection’ schemes exist elsewhere in the South and specifically Toller Porcorum near Dorchester.

Prior to this Local Plan consultation, Wimborne Minster had been responsible for 55% of all approved development across the whole SE Dorset area with 45% being spread around the remaining county (see Chapter 7: South Eastern Dorset Functional Area, pages 9-11, Figure 7.3). There needs to be recognition of this in the Local Plan and evidence to warrant further development and the removal of the remaining largest Green Belt area (WMC 6) within the town boundaries.

5. Economy

The Plan is lacking an up-to-date retail study and town centre needs assessment. At present, there is no up-to-date 'vision' for the town of Wimborne Minster, no up-to-date town centre proposals, nor the basis for a town centre masterplan reflecting current thinking.

The overarching policy on housing and employment does not appear to recognise the need for housing and employment (and infrastructure) to be delivered in a timely, coordinated manner. There is concern that the delivery of one (more housing) without the other (employment and infrastructure) would contribute to an unbalanced, unsustainable outcome.

There are no new key employment sites and no plans to increase local employment so therefore there is no correlation between employment and housing. The implications of this imbalance are of concern to WMTC. Bearing in mind the substantial increase in housing and over-burdened travel routes, new employment sites would be welcomed. Furthermore, new businesses, employment openings and training facilities maintain a working age population as well as provide opportunities for young people. This is an important consideration for Wimborne Minster as it would help workforce retention rates and start to rebalance the current bias in the local demographic (Wimborne has a higher population of retirees and elderly persons). WMTC would want to see the creation of sustainable jobs for local people not just short-term employment openings from construction work.

There is an absence of information about the future use of vacant buildings in and around the town centre which until recently provided significant local employment. Consideration must be given to the future use of the Police Station, Magistrates Court, Pippins and Wimborne First School. Dorset Council also owns the Furzehill site in a neighbouring parish. Could they be redeveloped as key employment sites, training facilities or provide housing?

Paragraph 123 of the NPPF refers to the importance of achieving a significant uplift in the average density of residential development in city and town centres and other locations that are well served by public transport, particularly where there is an existing or anticipated shortage of land for meeting identified housing needs. Page 20 of the draft Local Plan refers to the scope for higher densities in town centres and at other locations well served by public transport – but again there is little evidence on what has been researched and the conclusions reached.

Reference to these vacant sites and their future use must be included in the revised Plan and preferably in consultation with WMTC.

There is a high number of workers commuting out of Wimborne (the Plan states the former East Dorset District has the highest number of workers that commute by car or van in England and Wales at 79.5%). Wimborne has become a housing satellite for other areas, not only for BCP but also Southampton, Dorchester and further afield. If further housing is proposed, then corresponding additional employment opportunities also need to be included.

The key employment sites in Wimborne Minster are Riverside Park and Brook Road and it is welcomed that these are shown as being retained. Stone Lane Industrial Estate is actually in the parish of Pamphill. Clarification is sought on whether this is a proposal to amend this boundary so that it falls within the Wimborne Minster area or an error?

Wentworths Yard to the north of Leigh Road has seven companies operating from it and is another key employment site. WMTC requests that this is included as a key employment site.

The parking sites within Wimborne Minster are limited within the Town Centre boundary and many businesses report that customers struggle to find a space. Residents and commuters may buy parking permits which restricts the number of space available even further. The Allendale/Allenview Car Park is a large site and is marked on the Local Plan map at page 105 as part of the Allendale redevelopment. Not only is this car park vital for the town but it is also part of the flood defence system as operated by the Environment Agency.

The lack of parking and high rate of congestion is already a factor for people considering visiting Wimborne Minster and any reduction in parking and further congestion could deter visitors, shoppers, employees, and business owners from coming to the Town and this could have a serious impact on the local economy. WMTC does not support any developments which would require the removal of existing car parks.

WMTC recommends consideration of a vehicular bridge from the Co-Op Car Park in the town centre to access the High Street Short Stay Car Park (both of which are privately owned). Current access into this car park from the town centre is very awkward and dangerous.

WMTC would support some options for pedestrianisation through the town centre and improvements to Crown Mead shopping precinct which is totally out of keeping with the rest of the Town. Wimborne Minster has many independent shops and businesses with a growing cafe culture and is a nice place to live and visit. It is imperative that the vitality in the Town is retained and encouraged to grow.

Further to this, WMTC would like to see proposals for provision of a street market in the town centre. As a historic market town which is about to have its current market site redeveloped for housing, alternative provision must be found.

In the Local Plan at 5.6.2 there is reference to Impact Assessments relating to gross floorspace for an out-of-town store. Dorchester, Weymouth, Bridport and other much larger towns have an impact assessment size of 300m² but Wimborne Minster has 1,000m². What is the rationale behind this figure bearing in mind Dorset Council's aim to standardise policies across the county? WMTC strongly objects to this proposal.

6. Community Infrastructure

The transport and road network in and around Wimborne and Colehill is insufficient. There are frequent traffic problems particularly on the A31 and at Canford Bottom which impacts on access into Wimborne Minster causing gridlock in the Town.

The Canford Bottom roundabout was redesigned and completed in 2012 prior to the Olympics with a view to improving traffic flow along the A31 towards the West and Weymouth. This design has not been a success and has not only failed to increase traffic flow but has caused additional congestion on local feeder roads. Such is the local and national reputation and disdain for this specific junction, many road users attempt to avoid the chaos and drive through the Town instead

of remaining on the A31 in traffic. WMTC feels strongly that this design needs to be reviewed and revised after nearly ten years in use. Such large-scale road improvements are clearly considered as part of this Plan given the significant changes being proposed north of Dorchester to ensure smooth road networks are combined with increased housing.

There are no meaningful infrastructure proposals for the Wimborne area despite the additional housing already planned and the further housing proposed. If no robust solutions are available for traffic flow because of the age of the town and limitations imposed by our 3 ancient bridges then this should be acknowledged, and further housing plans abolished.

Transport sustainability for Wimborne is absent in the Plan, given the scale of the increase in households that will access Wimborne Minster's infrastructure from both Wimborne and surrounding villages/towns, such as Merley, Corfe Mullen, Colehill and Sturminster Marshall as well as rural communities. It is considered that this increase will require the infrastructure to be upgraded as follows:

- Transport Hub (proposed site available 'Pippins')
- Three bridges that are now significant arterial routes for foot, cycle and vehicular transport are no longer fit for purpose and solutions for future access need to be explored (specifically WMTC would like to see sensitive provision for pedestrians and cyclists into and out of the Cuthbury housing development to cross the river rather than use the dangerous crossing of the bridge itself.)
- A traffic survey, post Covid, is carried out to ensure that the most up to date information is available to assess traffic flows. WMTC does not believe that the Plan is evidence based and would want to see an updated and realistic traffic flow and modelling project undertaken once the existing developments at Cuthbury, Cranborne Road and Leigh Road/ Parmiter Drive are complete with a full consultation undertaken **before** any new housing contributions are forced upon the Town. Equally we would expect to see a full review of the adequacy and provision of services such as schools and doctors.
- Supermarket provision is key, not only to satisfy the growth of the Town but also to reduce shop commuting. Many residents will commute to cheaper, more diverse supermarkets, than are currently available in the Town.
- What marketing will be done to stimulate the return of eroded services such as banks and building societies?
- Hot food takeaways section be upgraded to cover all social well-being facilities, not all hot food is unhealthy, and alcohol is missing from this Plan.
- Community infrastructure and access to facilities should be additional to the town of Wimborne. A survey of Wimborne households should be carried out to ensure that utilisation and adoption of these facilities satisfies the demand of the current residents and precept payers. This should include sports, community centre proposals and schools. Key areas of focus should be to balance the young people's needs with the increase in retirement provision to ensure the Plan includes all needs across the demographic and is therefore fully inclusive. Benefits of this would be to reduce the potential for ill-discipline in the town.
- School provision should be reviewed as there is currently no Secondary or Upper School in Wimborne and the current system is already at saturation point producing a future 'known issue' of a lack of school places for the increased children that will be inevitable with the take up from the new developments.
- It is vital that demographic take up of the new developments be tracked to ensure no 'knee jerk reacting' is required for school provision.

Overall, the Community Infrastructure needs to grow with and address the current issues surrounding new developments. There are infrastructure problems at present and these will be exacerbated unless the lack of investment in infrastructure is addressed to ensure a flexible new vibrancy that is required for the future. This must take into account the increase in traffic and the resulting increase in CO2 emissions. Greenspace between towns must be preserved as a core principle and should carry the same weight as flood plain and toxic ground. This aspect would remove the 'easy picking' of land by developers, whether real or perceived.

WMTC would also welcome and support the inclusion of more environmentally friendly schemes such as renewable energy technologies in new developments, to include solar panels, ground and air source heat pumps and lithium battery storage. WMTC would like to see the provision of more rapid charging points for electric vehicles in and around car parks and new developments.

WMTC would also welcome the inclusion in the Local Plan of a policy that requires developers to respect and retain existing rights of way and TPOs in the layouts for their developments.

WMTC is already seeing degradation to road surfaces due to heavy construction traffic and increased traffic flow. The infrastructure is suffering and not sustainable for the future. Solutions must be found before further development is considered.

WMTC opposes the installation of traffic lights on Julian's Bridge.

7. SE Dorset Proposals: Wimborne and Colehill

WMTC strongly resists and disagrees that the Land at Leigh Farm (WMC 6) should go forward for development. This is the last remaining piece of open Green Belt land within Wimborne separating from Colehill. Furthermore, WMTC most strongly objects to the removal of Green Belt under WMC 6, 7, 8 and 9 and considers the proposals to breach paragraphs 134 and 135 of the NPPF. There are numerous reports and actions yet to be undertaken and which we consider should have been completed before including the 4 proposed sites for Wimborne and Colehill.

WMTC objects to the proposals at WMC 9. The boundary of this Green Belt site separates the three distinct neighbouring areas of Ferndown, Colehill and Longham. The site must be retained to prevent urban sprawl.

As mentioned earlier, the two Parishes of Wimborne Minster and Colehill are separate and whilst this remains the case, their separate identities should be protected and the land on which it is proposed to develop (WMC 6) preserves the setting and special character of the Town and restricts urban sprawl.

Indeed, there cannot be any exceptional circumstances to justify the development of this land when there are so many errors in base data as referenced in section 1.

Dorset Council commissioned a Landscape and Heritage Study from Land Use Consultants (LUC) and the results of this commission were published in two reports in January 2021. In neither of these reports does the land at Leigh Farm (WMC6) feature as having been assessed to identify '... areas which may be able to accommodate future development...'. However, the Local Plan states that removal of green belt and subsequent development at Leigh Farm (WMC6) is considered to cause 'low' harm. WMTC is alarmed by this statement given that there is no evidence of assessment to support it.

WMTC raises the following concerns with the WMC 6 proposal:

- With regards to the SANG. Access has been assumed via the disused railway line. However, WMTC is aware that the owner of the railway line (from Northleigh Lane to Greenclose Lane) refuses permission for this land to be included in the Plan and wants it removed. WMTC is also aware that some other areas of the proposed SANG are in private ownership and are not to be included in the Plan.
- WMTC considers that WMC 6 should be considered for 'Site of Nature Conservation Interest' status. It is a unique piece of land, it has no public access and is home to many different protected species, animals, birds of prey and reptiles. It is a nature corridor linking Wesley Woods to Leigh Farm to Bytheway. The site undulates from a low-lying swamp area, the natural land drain for this area, to higher levels of heath land. This is possibly the only such site in this area. For these reasons, it is a wildlife sanctuary. The area is a lifeline for the adders, grass snakes and lizards that live here. Any development of this area would involve loss of such important natural flora, and habitat for many species of invertebrates. Historically, there has been no attempt to improve the grass sward by re-seeding, with the result that only natural grass species exist. The field is therefore believed to comprise of unimproved natural grassland and contains an abundance of bracken which should be preserved. WMTC believes that the site should be protected until suitable surveys have been conducted by the relevant bodies.
- The proposed access to the site via Birchdale Road is unsuitable, it is too narrow and joins Cranfield Avenue on a dangerous bend. Cranfield Avenue/Wesley Road have experienced increased traffic over and above the original intended purpose. This road is now a rat run used at speed to avoid the already congested roads in the area. Further development will exacerbate the problem, causing additional risk and harmful impact on current residents.
- Dorset Council must provide up-to-date information on flooding, protection of ground water sources, sewage disposal capacity and other essential services for this site. Drainage of North Leigh Farm is poor and referred to in the Dorset Council's Flood Risk Management Team and Environment Agency map. It is of concern that the proposed development will alter the natural drainage and watercourse adversely affecting the area, surrounding properties and roads.

Reference is made in the Local Plan under Policy WMC 10 to the possible opportunity for change at Leigh Park Playing Field if the Rugby Club moves to new premises. This land is owned by WMTC and two thirds of the Field is protected from development as a QEII Field in Trust. No consultation between Dorset Council and WMTC has taken place before this policy was proposed.

As detailed previously, there is a need to provide an up-to-date 'vision' for Wimborne and renewed town centre proposals to reflect current thinking. Reference to vacant sites and their future use must be included in the revised Plan and preferably in consultation with WMTC (this includes the Police Station, Magistrates Court, Pippins, Wimborne First School, Wimborne Market development and the neighbouring Furzehill site). WMTC also wishes to preserve the playing field at the former Wimborne First School for public use. WMTC would wish to be involved in the discussions on the future of the First School playing field.

Comments from Wimborne Cemetery

Wimborne Cemetery is jointly owned by Wimborne Minster Town Council, Colehill Parish Council and Pamphill and Shapwick Parish Council.

The Cemetery (actually in Pamphill) has about 25 years of new internments left. Internments are cremated remains and burials. The current site has capacity until 2046 (only 8 years after the period of this Local Plan). At the point the Cemetery reaches capacity, the next stage will be reopenings.

The Wimborne Cemetery takes requests for internments from outside the 3 parishes, including Corfe Mullen and Poole. At present, there is approximately a 50:50 split between residents and non-residents. Despite the new Woodland burial area at Colehill and the new site at Lytchett demand has remained constant at the Wimborne Cemetery site.

Cemetery Boards operate individually, and it is not thought that anyone has data on overall capacity. At the start of the pandemic the Death Management Advisory Group contacted authorities for some capacity figures. It is the view of Wimborne Cemetery that Dorset Council should be collating data on land availability and capacity in order to inform more cohesive and evidence based future planning.

The Policy WMC 3 for new neighbourhoods includes land east of St Margaret's Hill. This land adjoins Wimborne Cemetery and is not suitable for development.

The Cemetery had hoped to acquire this land one day in order to expand due to the increasing demand for burial plots. Development will make this impossible. West Moors Cemetery appears to only be taking parish residents, Ferndown does not have a facility for burial and Wimborne Cemetery is therefore the next closest option. However, the Cemetery has a finite amount of space, and the proposed new developments as well as the projected population increases will mean it will struggle to accommodate the current, let alone future, demand.

Further to this there is a designated fire pit and recycle area on the cemetery site located next to the border of the St Margaret's Hill proposed development site, which has been unoccupied to date. These are in daily use by the Cemetery Grounds Staff. The potential nuisance of these facilities should be borne in mind before including it as a possible development site.

Finally, there are active badger setts along the NNE border of the proposed land where it adjoins the cemetery. They are a protected species. We are concerned that badgers like peace and quiet away from humans. If dwellings are built, they can only migrate into the cemetery. The cemetery has already experienced problems in 2018 as badgers have unearthed human remains. This problem would be exacerbated.

Conclusions

Dorset Council has failed to communicate with local Towns and Parishes to identify suitable areas for development and has produced a Draft Plan which relies on very little factual evidence, breaches the NPPF in numerous ways and has not followed statutory requirements to co-operate with its neighbouring Local Authorities.

Where a Local Plan does identify development within a parish, the town council concerned should be part of the early discussions before a Plan is drafted and consulted upon, in order that it may help identify areas which would be better utilised for meeting any housing need. WMTC considers that this would save time and public money, and irreversible damage to wildlife if local involvement was introduced at the very beginning of any planning process.

WMTC strongly objects to any further major housing developments and what appears to be a significantly unjustified and unfair distribution of proposed development in the Wimborne area. WMTC believes that the listed historic, severely restrained streets and unique infrastructure of the Town has failed to be acknowledged in this Local Plan. The additional development through the continuing proposed revision (removal) of the small areas of remaining Green Belt further burdens the historic Town. This is contrary to the NPPF.

WMTC remains concerned that the reluctance to delay the consultation allied to the extensive documentation that is presented is disenfranchising a significant part of the community who have not had been able to access the information or respond to the consultation during the pandemic.

Wimborne Minster Town Council reserves the right to include additional comments to this response when further evidence is forthcoming.

ADDENDUM – errata, misrepresentations and omissions

VOLUME 2 SOUTH EASTERN DORSET FUNCTIONAL AREA

7. INTRODUCTION PAGES 1-12

7.1.2 The description a “single urban area” is incorrect as each part has a distinct character. This statement contrasts with the assessment of Corfe Mullen at 8.11. It also differs from section 17.1.1 which states more correctly that these are two separate settlements with separate characters. **The summary at 7.1.2 should be corrected as it does not reflect the reality.**

It describes Wimborne as a Town Centre and Colehill as a Local Centre at 17.4.2. **However, Colehill is omitted as a Local Centre in the Economy section of Volume 1 at Figure 5.2 and this should be corrected.**

The map at page 105 shows the settlement boundary and includes part of Pamphill and Shapwick Parish. This may have been done to include the Stone Lane Industrial site. It also includes houses in this Parish. **However, this is not stated or referenced and should be.** The error is repeated at 17.1.7 when Stone Lane industrial estate is particularly referenced as part of WM/C. **It would help to overlay the Parish and AONB boundaries we ask for this to be done. There should also be enlarged maps of the Town Centre and The Allenvie area.**

Similarly, 7.1.2 refers to Wimborne having an upper school. It does not have an upper school. This is situated in Pamphill and Shapwick. In this instance it is not even included within the settlement boundary of the map at p105. **This should be corrected.**

We also note there is no reference to the Stour Valley Park Project and the area this covers. **This should be rectified.** It is referenced at 3.2.

7.1.3 Refers to the Cranborne Chase AONB but fails to mention its proximity to Wimborne. **It is correctly referenced as “surrounding the north western edges of Wimborne” at section 17.1.2 and should be changed at 7.1.3 to reflect this. We understand the AONB has written with corrections to the boundaries, and we hope these will be dealt with.**

7.2 Green Belt and Exceptional Circumstances

References to amendments are a euphemism as it is expunges the Green Belt.

7.2.3 No use is made of brownfield sites

The development sites are far from the town centre and location centre.

The proposed sites are not well served by public transport.

7.3 Housing and employment allocations

As noted in this section it does not include the plans for Alderholt. Therefore, to say reducing the Green Belt in WC is required is not correct. Nor does the plan include the potential housing additions from the Market site in Wimborne and the sale of Council owned property at Furzehill. **All these sites should be accounted for and included before use of the Green Belt is contemplated.**

7.3.4

Our assessment for Wimborne is that as at February 2021 planning has been given on the 3 developments sites for about 1 , 400 dwellings of which only about 100 have been completed since

2016/17 over a 4-to-5-year period. This leaves about 1,300 to build which is at odds with the figures throughout the plan and at section 17. There is a vast number still to be completed and at current rates this will take several decades. It is difficult to reconcile these figures as it is unclear whether the Parmiter and Park Farm House sites are included. **Current figures should be provided and dates of data given for future reference. See also 17.5 below.**

17 WIMBORNE MINSTER AND COLEHILL PAGES 87-105

17.1 Introduction

17.1.1

The population figure is wrong and should be corrected. 7.1.2 states the combined population to be 13,300. At 17.1.1 it is stated to be just over 8,700! **We would like to see the correct figures in both sections and a footnote as to the source and date. As this is a developing and long-term document all figures for population and houses yet to be built should be referenced to a date. Other public sources suggest put the figure over 16,000 in 2019.**

We would also like to see:

Population as at 2121 after the census

Anticipated population after completion of the sites which have planning

Anticipated population after the sites proposed in the DLP

Totals

17.1.3 The description of spaces omits Redcotts Recreation Ground. **It should be included.**

We challenge the assertion that there is a significant provision of recreational space. This is extremely misleading. Paths which used to have vistas over fields will now be surrounded by or overlooking houses. The enjoyment of the natural countryside has been lessened. **This should be removed.**

Although SANGS have been provided in the developments no assessment has been made, pro rata to the population, whether these have increased or lessened the open space. Without the population figures – see above- compared to acreage this is an unfounded assertion **and should be removed.**

17.1.7 The reference should include Wentworths Yard.

It cites commuting to Bournemouth and Poole. **It should also say there are other areas too, otherwise this is misleading for traffic flow and congestion.**

The predicted reduction in reliance on car travel at 17.2.1 has no evidence in support. This is before the additional housing! It seems unlikely there will be a net reduction. **This statement should be altered or supported by evidence.**

Nor does it address the traffic flow into Wimborne from Colehill, Sturminster Marshall, Corfe Mullen Canford Magna and Merley and other villages to the North of Wimborne which use Wimborne as a Town Centre. **This should be included, particularly as more housing is proposed in these areas.**

The last sentence is fatuous and should be removed. The retention of employment sites will not reduce out commuting. If there had been no additional housing in recent years it may have stabilised commuting, but with the existing and already planned and proposed growth commuting will increase as there has been no, or no commensurate growth in employment sites or employment opportunities.

Commuting is increasing and the problems created should be acknowledged in the plan and proposals made to reduce the impact, not increase it.

Nor is it correct to suggest that cycle lanes will assist the reduction in traffic to any great degree. In fact, they cause more congestion as can pedestrian traffic lights. They also tend to be used more for recreational activity. Cyclists who use road bikes are often not using the cycle paths provided as they damage their bicycles. The cycle lane on Leigh Road ends at Brook Road and does not go into town. Ironically it has been built where least needed – on a wide stretch of road. The section from Brook Road to the town becomes a narrow road with narrow pavements!

There should be a report to assess the impact of cycle lanes on traffic.

17.2 Vision

We broadly support the goals of the vision, but to say these will be achieved by the plan is a misrepresentation. **Instead of “will “it should read “will not”.**

Developing WMC6 between Wimborne and Colehill will not assist the maintenance of their own identities. The reverse is true.

Wimborne already has a sustainable centre and does not need the additional proposed housing to be so.

There are not more opportunities to walk and cycle. You will have more people so pro rata not more opportunities. As there will be more people again there is no evidence this will reduce traffic congestion.

No new medical facilities were provided for the developments at 17.5.

A first school has been built at the Cranborne Road and one is due to be built at the South of Leigh Road site. However, Wimborne has lost Wimborne First School and is about to lose St Catherines First School.

Only limited provision was made to expand Middle school facilities and no provision been made for additional Upper school capacity for many decades.

Curiously there is reference in The Verwood section at 14.5.7 to increased numbers of school children. The fact that there is a planned school at Verwood should be mentioned here, together with the stage reached and timescale for completion to relieve the pressure in WC.

The evidence section does not include an educational places needs assessment, nor does it suggest one is planned. There should be one. Any further schools should be planned to minimise the effect of increased traffic flow in and around the town as the town centre is already gridlocked at school commuting times.

Please note paragraph 8.13 of the Core Strategy in 2014 states new housing will require further upper school places and there will be pressure on middle schools to expand.

The merging of Wimborne and Colehill and reduction of the Green Belt does not maintain but detracts from “rich historic character”. Wimborne ceases to be a historic market town if it is part of an urban sprawl.

The plans for development do not assist biodiversity but restrict habitats and limit corridors between areas. See also the NPPF paragraphs 170-177. **No reference is made to the impact on the site itself and this should be corrected.**

17.3 Development strategy

17.3.1 The proposition that development and future development will draw the areas together and improve access to open space is asinine and not evidenced. We have linkages between the settlements. We do not need or want any more. It is not demonstrated that there will be access to schools and services, let alone good access. This appears to be a marketing paragraph unfounded in fact. **This needs to be seriously considered and deleted or substantially amended.**

The plan does not consider the 4 WC sites as a whole and their combined impact. It should do.

Nor does the plan relate to the proposed developments to in Ferndown, St Leonards, West Parley, Merley, Corfe Mullen and Sturminster Marshall, Merley and Canford Magna.

The Core Strategy of 2014 para 8.7 states "the Green Belt between the settlements is very narrow and maintains their separate identity. One of the main purposes of the Green Belt is to prevent coalescence of settlements, so this open area is particularly important to protect". These comments should still apply. And even more so as developments have taken place since 2014.

17.3.3 the same comments apply as to 17.3.1. **How do the smaller sites “complement”? How do they improve cycling and pedestrian routes, if at all? The routes within the sites should be discounted as they are not needed without the houses. The proposed building at Leigh Farm destroys the separation between Wimborne and Colehill rather than safeguarding it. It is already protected by Green Belt status.**

17.4 Town Centre Strategy

17.4.1 The written description of the Town Centre does not accord with the map boundaries at page 105. e.g., it includes Walford Mill. **The conflicting descriptions of Town Centres should be rectified. At page 105 rather than “Town Centre boundary” it should be renamed.**

17.4.2 **Do primary and secondary shop frontages exist in this plan. If so where are they defined?**

17.4.3 The notation of 160 shops may not just be retail, but also services. **UpToDate information should be gathered.**

17.4.4 **How are these figures assessed? Please provide the evidence source and date? Which population figures or forecasts are these figures based on?**

WMC1:

I Should also refer specifically to Merley, Canford Magna, Corfe Mullen, Sturminster Marshall, and villages to the North of Wimborne.

III The list should include The Model Town and The Priests House Museum.

Reference should also be made to Wimborne Radio and supporting a permanent home for them and indeed finding one in a community building.

We support in principle enhancement of the Allenview area, but it needs detail and provision for costs. We do already have a community centre there and a considerable amount has been spent on the structure recently. WMC2 is very brief and general.

The title needs to be consistent as elsewhere at and at the plan at 105 it is referred to as the Allendale Redevelopment Area.

As suggested in the Core Strategy 2014 paragraph 8.35 WCM4 the following are required for this area: Flood risk assessment; Conservation assessment. Public car parking assessment for Wimborne town Centre, and an assessment of a need for community facilities. None of these have yet been done despite 7 years having elapsed.

There is no provision or money for cycle parking e.g., cycle racks. **There should be see NPPF paragraph 104d.**

The section is silent on 2 potential sites owned by Dorset Council. One is Pippins which is vacant, derelict and an eyesore and has been for many years. The other is the vacated Wimborne First School. **We wish to see both sites referred to in the DLP.**

The EDDC draft plan of 2018 at page 141 also included a transport hub proposal to “minimise congestion and air pollution and to support sustainable modes of transport and pedestrian safety. There is no reference to any such hub in the DLP. **Why not?**

The same draft plan at page 140 sought to improve pedestrian/vehicular conflict subject to funding. This has not been repeated. **Why not? Are there any plans for pedestrianising the Town centre?**

Nor is there any reference to parking or the policies in the Town Centre or provision for increased parking. **Why not bearing the increases in population already planned?**

Linking into the proposed development of the Police Station and possibly the Fire Station we would want to see proposals for their relocation, which are at present missing from the plan. We are already aware that there could be a problem relocating the CCTV.

17.5 Main Development Opportunities

Cuthbury allotments and St Margarets Close, Cranborne road new neighbourhood, South of Leigh Road new neighbourhood and Sports Village

It is confusing to combine them with proposed developments, and they should be in a separate section of developments underway where planning has already been granted.

For each development the plan should clearly state the

Original housing allocation

Houses added to the original allocation

Total hoses approved and the date

Total houses built and the date

Total houses to be built and the date.

This is because the figures in each are inaccurate.

Do these sections include the developments at Parmiter and Park Farm House? If not, they should be referenced, and the data included, or the situation made clear.

These sections read as a cut and paste from previous plans. They are often woefully out of date. These should be looked at afresh. There are also inaccuracies. Examples are set out below, but they are not exhaustive.

The sustainability data for the 4 sites look as if they have only been partially completed and are erroneous. Much more work needs to be done on these.

Cuthbury

17.5.1 The reference to the allotments in the title and elsewhere is misleading **and should be corrected**. The development far exceeds the old allotment area.

17.5.2 The development did not give an opportunity to relocate the Football Club. It meant it had to relocate. It should also be in the past tense as the Football Club has already moved.

WMC 2 The date of expiry of the option should be inserted and any relevant provisions of the 106 agreement. If the option is not exercised the land reverts to the developer and an assessment of potential housing in this reversion should be included. The option may even expire before 2023.

WMC3:

I Again, the area is wider than stated and, on both sides, of the river.

The Hospital – or Trust- has an Option to exercise. It is not so much whether the land is needed – but whether the trust has the funds for it. **The wording is misleading and should be corrected.**

III This should largely go into the past tense. The allotment holders have already moved.

IV

We understood there will be a pedestrian crossing on Victoria Road, but this is not mentioned. Why?

V The Football Club has already moved.

The allotment holders have already moved. However, they had to leave the old allotments before the new ones were available and there was a gap of about 2 years, so this phasing ambition was not achieved.

V should be deleted in full as it is otiose.

Cranborne

17.5.3 It is stated that this will include “new shops and services to meet daily needs and a new first school”.

First it is a replacement first school. The word new mistakenly implies an additional school. It is obviously “new” in the sense it is being built **and the adjective is not required**. The pupils and staff moved from Wimborne First School, which is empty apart from some temporary non-school use. There is no chemist, doctor's surgery, butcher, greengrocer, bakery, petrol station, bank, Post office,laundrette etc. There is only currently provision for basic needs. **The wording should be**

specific or at least reflect the minimal provision. The words “shops and services to meet daily needs” is over egging the provision. There is no provision at all on the West side

17.5.4 is again otiose as the permissions have been given **and should be removed.**

The pedestrian lights /traffic lights have not been mentioned. Why?

WMTC 4

II is this not redundant as well

IV Have the public transport, dedicated pedestrian and cycling routes come to fruition?

South of Leigh Road

References here to the Football Club should be adjusted to what has happened and the provision of a skate park and allotments.

7.5.7 The Town Centre is not easily accessed by bicycle. There is a new path along Leigh Road, but that stretch was already reasonably safe for cyclists. The termination point is at the Gordon Road junction where the road narrows to the Quarterjack Roundabout. In many ways this is likely to increase accidents and lead to conflict between pedestrians and cyclists on a very narrow stretch of pavement.

17.59 Where does the sports pitch figure comes from and the date. Also, if Leigh Park is developed as is suggested in the DLP the gain will be less.

17.5 Land at Leigh Farm

The Core Strategy of 2014 para 8.7 states "the Green Belt between the settlements is very narrow and maintains their separate identity. One of the main purposes of the Green Belt is to prevent coalescence of settlements, so this open area is particularly important to protect". These comments should still apply. And even more so as developments have taken place since 2014. Paragraph 17.5.5 of this plan states "It is important to maintain the long-term integrity of the Green Belt gap between Colehill and Wimborne." The integrity of the separation between C and W is also referred to in the Inspector`s report on the draft Core Strategy of 2014. It is also referred to in the Dorset Council Green Belt review 2017. **These comments should be referenced and not just ignored.**

Leigh Park Playing Field

17.5.22 It should read the Rugby Club “may relocate shortly”. No decision has been made by the Rugby Club. The terms of the proposed lease, or how the ownership will be structure, have not been made known to the Rugby Club or the Town Council. See page 65 of the Playing Pitch Strategy Assessment Report 2019 which suggests “establishing a community organisation/charity to ensure a solid and robust operating structure for the site”. This appears in the Evidence section to the plan.

The proposals

are also are contrary to the conclusions at page 7, and page 59 of the Report where the aim is to protect and enhance this site as rugby pitches.

The reference to moving to the West of town is patently wrong. - see the plan at WMC5 I.

The land is owned by Wimborne Minster Town Council and no discussions or consultations have taken place with us about this use.

About two thirds of the Playing Fields are registered as a Field in Trust and this is not referenced.

There is no suggestion about the source of the funding for the changes to the grass area or the existing building.

The proposals also reduce open green space which can be used 24/7 by the general public.

These issues should be discussed with the Rugby Club, Allendale Football Club and the Town Council and amended as necessary.

The Core Strategy 2014 at Policy WMC9 stated an area brief is to be agreed with the Council to set out how best to achieve the greatest benefit for the residents of Leigh Park, but nothing has been done.

Conversely, the Plan does not mention the playing field at Wimborne First School, owned by Dorset Council, which could be designated in a similar way to Leigh Park at WMC10. School to maximise

17.5.23 The four options are not anywhere near the central areas of Wimborne and Colehill. This means there is no easy, let alone easier access, to services and facilities. Nor is there any evidence that there will be a decreased reliance on cars. Releasing areas for development does not allow greater protection of the open areas. It decimates them. A SANG is completely different to green open space and the Green Belt. Moreover, a SANG would not be needed if there were no development.

Indeed, as no new key employment sites are envisaged in WC there will inevitably be increased commuting. Wimborne Town Centre is not in easy walking distance of these sites and the problem with the cycle lane has already been identified above.

The suggestions in 17.5.3 are false and illogical and this paragraph should be removed. A correct representation should be added.