

# Dorset Council Local Plan: Response from Motcombe Parish Council

## Section 2 Development Strategy

### DEV1: The housing requirement and the need for employment land in Dorset

It is accepted that the starting point of the housing numbers for the area is a matter dictated by the housing projections cascaded down from central Government. It is disappointing that these are using out-of-date populations projections and appear to take no account of environmental constraints at this first stage.

As worded this states that provision is made so that (a minimum number) of houses 'will be delivered'. Yet the actual delivery is not within the control of Dorset Council or local communities. It would be much better to phrase this along the lines of the provision "will enable landowners and developers to deliver this growth..."

Section 2.7.3 highlights that past delivery has been below the target rate set in local plans but provides no analysis as to why this is the case – which is critical if we are to avoid repeating this problem (and unnecessarily develop unsuitable land).

We would also like the Council to consider including sub-area targets for each functional area within the policy, if there is a genuine spatial strategy that seeks to direct growth in a manner that is sustainably balanced, and to minimise the risk that (for example) the failure to deliver on development on one side of the county will be seen to be remedied by further growth in a completely different area, if the housing land supply falls below 5 year's supply.

There is also the issue of counties who are unable to meet their targets being able to have the shortfall provided for within neighbouring counties. Motcombe is situated right on the Wiltshire border, so this could become a very unwelcome threat to the parish.

The policy should also reflect/recognise the need for housing and employment (and infrastructure) to be delivered in a timely fashion – the delivery of one without the other would be unsustainable. Para 5.1.6 (and to a lesser extent 2.2.10) recognises that "Recent significant events such as the declaration of a climate and ecological emergency, Brexit and the Covid-19 pandemic have the potential to profoundly impact the local and wider economy. Although some effects are already becoming apparent there is much uncertainty and it is too early to tell how places and sectors will change as a result of these issues. Further work will be necessary to fully appreciate their implications for the economy." but this is not really addressed in the strategy in any meaningful way, or any real consideration given to what impact this could have on housing (not just employment) needs.

It is also disappointing that the provision/capacity of infrastructure (highways, public transport, utilities, superfast broadband etc) is not clearly reflected in the bullet points under the heading 'achieving sustainable development'. There is no clear evidence on any assessment of this factor. Indeed, para 2.9.8 refers to the need for engagement with infrastructure providers to determine what infrastructure is needed to support growth that may be proposed in a neighbourhood plan, but that work should already have been done and included in this strategy as part of the wider

Dorset needs. Similarly 6.1.5 refers to the production of an Infrastructure Delivery Plan (IDP) to provide “an overview of the range of infrastructure projects required to support the growth in the local plan.” And goes on to state that “An IDP will be produced for the submission stage of the local plan production, once future infrastructure needs become clearer through consultation.”

It is hoped that when this IDP is produced, it will also be subject to a consultation process.

## **Spatial strategy**

There appears to be little in the way of a meaningful, considered spatial strategy that looks holistically at the county, rather than mainly ‘knitting together’ the previous draft plans.

The Plan makes no reference at all to the potential proposal for a National Park (not even under section 3.5 on landscape), and the implications that this may have for reviewing and potentially extending the designated nationally protected landscapes (particularly given the fact that the Dorset AONB boundary has not been reviewed in more than 50 years and potentially should include many areas that current sit outside its area).

Motcombe, whilst lying just outside the Cranborne Chase ANOB, is on the edge of the acknowledged special landscape of the Blackmore Vale, and within the Gillingham Royal Forest area with a wealth of heritage and cultural associations, is therefore arguably of equal quality to areas within the AONBs, but undervalued as such.

The Local Plan also does not give any meaningful thought as to whether **Neighbourhood Plans** could play a role in identifying sites to meet the housing needs of the area through their plans. Motcombe has produced a plan that caters for a reasonable level of growth, and once this is built, whilst we would expect to look at identifying further sites, there is a limit to this process if Motcombe is to keep its rural village identity, which residents felt was vitally important during consultation for the Neighbourhood Plan, especially with the threat posed by close proximity to Shaftesbury and Gillingham.

A background paper on the role of neighbourhood plans was referenced in the Plan (2.10.6) but is not included in the list on the Plan web pages. This is an unfortunate omission.

## **Settlement hierarchy**

The plan proposes four different settlement tiers (large built-up areas, towns and main settlement, village with development boundaries and villages without development boundaries). There is a background paper that has been produced on this matter, but this does not include any detailed analysis of the base data considered, which makes it difficult to understand exactly how some settlements have ended up in the various categories.

For villages such as Motcombe, which is positioned as a Tier 3 settlement, some of the facilities are not necessarily guaranteed as being sustained (for example, the increasing competition for the community shop with new food retailers at Kingsmead Business Park and the proposed adjacent new local retail centre). Public transport services serving the village is one such facility which has been, and will no doubt continue to be cut back, and the fragility of such services to commercial operator withdrawal does not appear to have been tested.

## **Transport and access issues**

3.15. This proposal, that sustainable locations for new housing should be within 15 minutes drive to larger towns, potentially puts extreme pressure on the future of Motcombe as a distinct rural village, being well within this limit for both Gillingham and Shaftesbury.

#### **DEV4: Growth in the North Dorset functional area**

The growth policies (DEV 2 - 5) set out the intended strategy in terms of growth for each functional area. Dev 4 makes no mention of the 'hidden' growth within larger villages, In Motcombe's case, annual growth in the Plan equates to 7.6 new dwellings over 17 years, compared to 3.6 per annum over 10 years within the Motcombe Neighbourhood Plan. This is a substantial increase in an area hoping to continue functioning as a separate rural village squeezed between two rapidly growing neighbouring towns. However, there is no analysis to show how this figure was derived, and whether local context was ever taken into account, rather than simply dividing a notional housing target for larger villages by either the existing population level, or the number of such villages.

Are the Neighbourhood Plan housing numbers, as specified in Appendix 2, (as stated in 2.10.6) simply based on the strategic allocations (where such are proposed) plus projected growth from SHLAA sites (of which there appear to be only five shown for Motcombe – of which only one is deemed suitable for limited development, land off Motcombe Road currently subject to a planning application, according to the latest list) plus windfall? This is not clear. It fails to plan positively for these areas in terms of any real consideration of their needs, and the detailed supporting analysis contained within any relevant made Neighbourhood Plan. Undertaking a Neighbourhood Plan is not a simple or quick task, a supportive Local Planning Authority that appears to genuinely listen and implement the plans those communities produce is essential. There is also concern that when a site is shown as developable in the SHLAA the basic checks have been completed to allow development on the site, and not have a situation where a planning application is rejected if the site is subsequently considered susceptible to flooding or other planning issues.

Finally, the policy includes reference to housing growth through windfall and infilling within existing settlements defined by local plan or neighbourhood plan development boundaries (part (v)) but does not specifically reference the local plan boundaries. It may be helpful if the policy were to be rephrased to more clearly articulate the role of Neighbourhood Plans and distinguish between strategic growth areas (the larger scale allocations) and more local growth that may contribute to the overall strategic needs.

As mentioned earlier, the promised background paper on the role of Neighbourhood Plans has not been made available, which might have addressed the points made above.

#### **DEV6: Development at villages with development boundaries in rural Dorset**

This policy would apply to Motcombe as a Tier 3 defined settlement. The supporting text refers to development in these locations being 'at an appropriate scale to the size of a settlement' – however the factors perhaps do not cover all of the issues, which we would describe as:

- keeping the villages' more rural character (in particular avoiding more urban forms of development in terms of their scale, density and layout),
- maintaining a close visual and functional connection to the countryside,
- maintaining a reasonable range of local facilities to meet local needs and encourage social interaction at all age levels,
- having a population size and pace of growth where people can know or recognise each other because their paths will cross – which means avoiding major growth.

The potential to amend development boundaries to meet local needs is specifically referenced in para 2.6.19 and should be reiterated in the policy wording. There appears to be some confusion within Dorset Council over whether this is legally possible (which is why the published policies map is still showing the Local Plan boundaries even when they have been updated by Neighbourhood Plans) – but in any event national policy and legislation accept that they both have development plan status, and that any conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan. As with DEV3, there is also no reference to site allocations through Neighbourhood Plans – which could be enabled through a change to the wording, along the following lines:

**DEV6: Development at villages with development boundaries in rural Dorset**

*'In rural Dorset beyond the Green Belt and away from large built-up areas, towns and other main settlements, the 'larger villages' (in Tier 3 of the settlement hierarchy) will be the main focus for development.*

*Within local plan development boundaries at the 'larger villages' (as may be amended through Neighbourhood Plans) residential, employment and other development will normally be permitted provided that:*

- i) it accords with any site-specific policies for the strategic expansion of the village in this local plan, or*
- ii) it contributes to meeting the needs of the local area and is at an appropriate scale to the size of the settlement'.*

The second part of the policy appears to relate more to Tier 4 settlements, and this too could be clarified through a change along the following lines (so as to avoid confusion with Tier 3 village plans):

*'Local communities may also define neighbourhood plan development boundaries around villages that do not have a local plan development boundary, in order to meet local needs at an appropriate scale to the size of the settlement. Within neighbourhood plan development boundaries, residential, employment and other development will only be permitted if it accords with the relevant policies in a neighbourhood plan'.*

**DEV7: Development outside local plan and neighbourhood plan development boundaries in rural Dorset**

This policy similarly needs to be amended to enable Neighbourhood Plans to make site specific allocations to meet local needs, where this is appropriate.

**DEV9: Neighbourhood plans**

The housing targets are primarily based on the anticipated levels of housing identified through extant consents, infill opportunities on large sites identified within the settlement boundaries and a pro-rata projection based on a sample of past windfall over the past 7 years. These are expressed as a minimum presumably in order to ensure that the plans do not unintentionally undermine the housing land supply for the Local Plan area, and also to clarify that additional growth would be acceptable.

Whilst in theory this may seem a reasonable approach, the pro-rata windfall rate may potentially cause issues for some areas, if it is unlikely to be sustained. However the scale of growth proposed for Motcombe (129 homes) is considerably greater than the extant consents and Neighbourhood Plan proposals, so even the minimum target in the draft Plan presents an unacceptable level of future development within our parish, and would impose further pressures on local infrastructure, especially roads and schooling.

Some minor amendments to the policy wording would therefore be useful:

**DEV9: Neighbourhood plans**

*In preparing, or updating, a Neighbourhood Plan, due regard should be had to:*

- i) *how the plan positively contributes to the local plan vision and strategic priorities and the requirement to be in general conformity with its strategic policies;*
- ii) *what infrastructure may be needed to support development and how this can be provided in a timely fashion; and*
- iii) *whether there is reasonable certainty that the policies and proposals are deliverable, and the mechanisms for monitoring and reviewing the plan’.*

**There are other issues within the proposals contained within the specific Volume 2 section covering the North Dorset Functional Area which raise concerns:**

**28.1.6** The provision of a care village serving the needs of Shaftesbury and Gillingham (within 1km of the town centres) appears to imply a site within Motcombe, this parish being adjacent to both towns. Whilst it is appreciated that the provision of improved facilities would be welcome, especially with continuing population growth in the two towns, such a development seems at odds with maintaining the rural village nature of Motcombe parish, and the status of the Gillingham Royal Forest.

**29.1.3** Kings Court Palace and the associated Park Pale scheduled monuments are described to imply they are located within the Gillingham town boundary, when in fact they are within the Motcombe Parish boundary.

**Fig. 28.4** Why is the very busy B3081 not shown on this map? This road is key to serving the inter-relationship needs of Shaftesbury-Gillingham, plus access to the A303 and A350, and is likely to become even more congested with the increased population targets shown in the Plan. Recent work on this road in Gillingham is unlikely to be sufficient to cope with strategic growth in the area, nor will the proposed new link road within the Southern Extension developments provide much relief. Towards Shaftesbury, the proposed link to the A30 at Enmore Green mentioned in the plan is supported, but this does not eliminate the tight, dangerous bends, especially those adjacent to the Turnpike junction to the Motcombe road. The improved retail facilities within Gillingham town centre, envisaged in the Plan, might lead to fewer journeys on this road.

**Optional Urban Extension (Gillingham):** This proposed development at Peacemarsh is opposed by Motcombe Parish Council as it would impose additional, and unacceptable, pressure on local infrastructure. The need for yet further large-scale developments in the Gillingham area is also questionable. This would also create the need for additional sites for employment in the area, which does not appear to have been considered in the Plan. Finally, the River Stour and associated green routes (including the Stour Valley Way) would cease to form the natural northern boundary for development in the town.

**Land south of Wincombe Lane, Shaftesbury:** The proposal for community facilities on this site are supported, especially the siting of a new primary school in the town, helping to alleviate pressure on Motcombe primary school.

## **SECTION 3: THE ENVIRONMENT AND CLIMATE CHANGE**

### **ENV7: Achieving high quality design**

Whilst the aim of good design has obvious benefits, to some extent (ii) and (iii) overlaps and the inclusion of (iii) suggests that mediocre designs will be acceptable.

The draft National Design Code has now been published and it would be timely to update this section in light of the factors that covers and how this may be taken forward through the Local Plan process or in supporting Neighbourhood Plans.

## **ENV8: The landscape and townscape context**

With the pressure to maximise profits, adequate garden size is increasingly becoming an issue in design, in terms of achieving adequate space with reference to the likely occupants. Whilst this is mentioned in the forerunner to Policy ENV8 it does not appear to be covered by the policy wording.

The second part of the policy appears to relate more to Tier 4 settlements, and this too could be clarified through a change along the following lines (so as to avoid confusion with Tier 3 village plans):

*'Local communities may also define neighbourhood plan development boundaries around villages that do not have a local plan development boundary, in order to meet local needs at an appropriate scale to the size of the settlement. Within neighbourhood plan development boundaries, residential, employment and other development will only be permitted if it accords with the relevant policies in a neighbourhood plan'.*

With the pressure to maximise profits, adequate garden size is increasingly becoming an issue in design, in terms of achieving adequate space with reference to the likely occupants. Whilst this is mentioned in the forerunner to Policy ENV8 it does not appear to be covered by the policy wording. The policy should ensure sufficient private garden areas. This should be proportionate to the dwelling size, ensuring these are sufficient space to meet occupiers' needs (such as for an outdoor clothesline, and to store bins, cycles and gardening equipment), space for a sitting out area without excessive shade, and, in respect of family homes, space for children to play (unless there are exceptional reasons why this is not possible). Recent experiences of planning applications show no attempt to rectify concerns raised about family homes proposed with garden areas which are small and unusable because of their size and the topography, and where the plans fail to show how these could accommodate bin stores, cycle stores, sheds etc let alone any space for children to play.

## **ENV9: Achieving high levels of environmental performance**

Whilst this policy appears laudable, achieving standards above that required through Building Regulations does not appear to be given any meaningful consideration under existing plans - in practice to what extent has this policy been used – how has it been considered and has it ever been used as a reason for refusal? If not, then a more stringent policy is either needed, or the policy should be removed as superfluous.

## **ENV13: Flood risk**

In Motcombe a key historical issue was flooding in the village's conservation area from the streams draining the hill below Shaftesbury, leading to a major flood prevention scheme that was completed in 1997. However, other areas of the village are still subject to potential groundwater flooding, and this needs to be respected when planning applications are scrutinised.

Reference to issues such as this should be made in the Local Plan to raise awareness, and the areas subject to such special measures should be specifically shown on the Policies Map. It would also be helpful to ensure that the policy clearly reflects all forms of flood risk, by amending it to read "Development should be located in areas of lowest risk **from all potential sources** of flooding. The council will sequential..."

## **3.2 Green infrastructure strategic approach**

**3.2.5** Supporting and developing cycleways are mentioned as part of future policy, but no mention is made of potential funding to achieve this goal. For example, Motcombe PC and Gillingham TC have a long-term ambition (described with the Motcombe Neighbourhood Plan) to turn the current bridleway between the two settlements into an all-weather cycleway.

**3.2.6** There are currently no proposals to create additional strategic multi-functional green spaces in the N Dorset area. With large increases in the population forecast for N Dorset, there should be considerations in the Plan to create large-scale recreation areas to help alleviate the increasing pressure on the few current sites, such as Duncliffe Wood.

## **3.6 Protecting and enhancing heritage assets**

The plan does not mention the **Gillingham Royal Forest** as a heritage asset. Motcombe is located within the area designated as the historic Gillingham Royal Forest, the subject of a considerable funding from the National Lottery awarded to Dorset Wildlife Trust for a project to: '*collaborate with local communities to investigate the potential to restore, recreate and reconnect this historical landscape*'. This is embedded in Policy MOT5 within the Motcombe Neighbourhood Plan and needs to be reflected and respected in developments within the Plan.

## **SECTION 4: HOUSING**

### **HOUS1: Housing Mix**

In many of the villages, a key issue in terms of housing has been the lack of smaller open market properties (as there are usually plenty of larger properties) and 1 bedroom affordable homes. There is also the potential need/benefit of flexible accommodation to enable live-in care/annex options as part of any housing mix (with reference to section 4.5).

The policies in the adopted plans fail to secure the delivery of these most needed house types, with delivery generally focusing on larger (and presumably more profitable) traditional house types that do not provide any real flexibility. Even the consultation responses typically generated from the Housing Enabling Team appear to ignore any evidence of local need and house sizes proposed, and focus simply on the Dorset-wide totals in supporting every scheme.

In the absence of any information to define what "an appropriate mix of homes of different sizes, types and affordability" and lack of meaningful input from the Housing Enabling Team, this mismatch is likely to continue given the current wording and lack of any supporting evidence. This could be covered through supplementary guidance, but there is no reference to such guidance being prepared. Point (iii) is supported – which addresses this issue for those communities who have the resources to undertake Neighbourhood Plans.

### **HOUS2: Affordable housing**

The provision of social rented as part of the affordable housing supply is something that is welcomed to provide a greater range of affordable units that are genuinely affordable to people on local wage levels. However it is noted that, at the current time, it is unclear how the provision of affordable housing will be viable given that the plan suggests that this has not yet been assessed.

### **HOUS3: Affordable housing exception sites**

Whilst in principle this is a useful policy tool, under (i) there is a lack of clarity in terms of what constitutes a settlement and the use of the word 'adjoining' which is perhaps too rigid if applied to settlement if this is defined by the development boundary (as it would unreasonably rule out sites where there may be a small but walkable gap between the site and the settlement, or rely on boundaries that have not been reviewed in decades).

The proposal for Neighbourhood Plans to be able to include small numbers of market homes on rural exception sites is supported.

#### **HOUS4: Specialist purpose built accommodation**

Does not appear to have any locational criteria. Presumably, this relates to provision within settlement boundaries or through the re-use and/or expansion of an existing building, but this is not clear from the supporting text (although 4.5.16 perhaps attempts to do so but does not refer to DEV policies).

#### **HOUS6: Self-build and custom-build housing**

Whilst this is identified as a non-strategic policy, it may still be useful to clarify in (ii) that self-build and custom-build housing can also be supported on sites outside of development boundaries if sought through Neighbourhood Plans.

#### **HOUS13: Sites for gypsies, travellers and travelling showpeople**

The proposed allocations (HOUS10 and HOUS12) make provision for around 57 pitches for Gypsies and Travellers; which is significantly in excess of the need identified in HOUS10 (which is for 20 pitches) to ensure that amount of provision meets the identified need. However Policy HOUS13 then goes on to provide a general policy that would enable further sites to come forward. This seems to be giving more flexibility for such a site than that offered to rural exception sites for affordable housing (where a specific need that cannot be otherwise met needs to be demonstrated) or self build, low impact dwellings etc... which is not fully justified in the text.

In particular, three sites for travellers have been proposed for the Shaftesbury/Gillingham area. Where is the evidence to demonstrate a need at this level for three sites in such close proximity? In addition, the one in Gillingham is proposed for a site which is currently a garden centre (Plant World). With large increases proposed for housing in these two towns, surely the reduction in such retail outlets is a move in the wrong direction, particularly as such centres require extensive space to display plants etc. but with land use for housing being the focus in the Plan, it seems unlikely that new sites will become available.

### **SECTION 5: ECONOMY**

#### **ECON2: Protection of other employment sites**

Whilst small sites within the countryside do not necessarily support the most sustainable patterns, they are a very important source of local employment (particularly small enterprises that may not necessarily be wholly appropriate in residential areas and are not dependent on major deliveries or customer access) that supports the rural economy. Their absence from Appendix 6 should not be misinterpreted as having no value.

#### **ECON3: Hierarchy of Centres and the sequential test ECON4: Town centre impact assessments**

The current definition within Figure 5.2 for Gillingham appears to ignore the current retail developments that are taking place in the Kingsmead Business Park area, with plans for a local retail centre to serve the extensive new housing planned for this area, overall creating two retail areas in the town.

#### **ECON9. New agricultural buildings**

Whilst it makes sense to ensure that there are no existing buildings on the unit which are capable of re-use for agricultural purposes prior to allowing new buildings, this does not prevent such buildings being converted or sold off immediately prior to the application, creating a potential loophole. For example, against the wishes of Motcombe Parish Council, an outline plan to convert old chicken sheds into dwellings was recently passed without any such discussion, or conditions. Wording more similar to that used in Part 6 Class A ref A.1.a and b of the GDPO may be appropriate.



## **SECTION 6: COMMUNITY INFRASTRUCTURE**

### **COM4. Recreation, sports facilities and open space**

Figure 6.4: Guidance on standards for built recreation facilities does not appear to readily match with the proposed approach for such villages to be within a 15 minute car-borne trip (or 30 minute public transport) distance of the towns – and should be amended for consistency. A 30 minute car-borne trip would seem excessive.

Part (i) of the policy is not clear as to the thresholds that would be applied for the provision and would usefully reference the standards to be applied. It is disappointing to see that no reference is made to natural greenspace provision (or any relevant standards).

### **COM6. The provision of education and training facilities**

6.6.5 describes how education provision might be expanded. However, the Dorset Plan presumably cannot influence education provision where this is delivered through academies, rather than via the county. For example, primary education in the Shaftesbury area is under intense pressure, leading to the increasing numbers of Shaftesbury resident pupils attending Motcombe school, but provision in the Shaftesbury area is mainly vested in the Sherborne Area Schools Trust.

### **The transport network**

6.7.1 appears to focus on the rural population as being the main source of car-borne trips, when in reality a significant proportion (typically over 50%) of the urban population travel to work by car, much more than those who might travel on foot or cycle. Sited between the two neighbouring growing towns of Shaftesbury and Gillingham, plus the extending large village of Mere, Motcombe suffers from increasing traffic volumes between these centres. Also, many, and an increasing number of, pupils attending the village school are from Shaftesbury, leading to an extensive 'school run' creating major congestion in the village twice a day.

What the Local Plan does not focus on (but should) is the adequacy of the infrastructure to cope with any increase in trip generation, which will have a disproportionate effect on Motcombe due to its location.

Finally, will Dorset Council be putting pressure on Network Rail to upgrade the line from Salisbury-Exeter to cope with significant continued population growth expected all along the line (and the delays caused when services to the West from Paddington are diverted to Yeovil – Exeter), including extensions to station car park facilities?

### **COM8. Parking standards in new development**

The policy refers to parking provision being made in accordance with the council's published local parking guidance. The current guidance is based on 2001 car ownership levels projected forward to 2026, but evidence has shown that the 2026 car ownership levels have already been exceeded in many areas. The parking standards need to be updated and subject to consultation. The issue was highlighted within our Motcombe Neighbourhood Plan in Policy MOT20, based on the observation (and evidence) of the problems arising where inadequate provision leads to overflowing onto village roads which do not have the capacity to safely absorb parked cars. One of the newer developments in Motcombe, Summer Oaks, is a prime example of inadequate off-road provision where parked cars line the main road through the village. The problems are also further exacerbated by current practice of developments placing parking in tandem (for example 2 parking places placed one in front of another in front of a garage), which severely reduces the effective use of the spaces in practice, as it requires the cars to be 'shuffled' before they can be used, and as such the 'easier' option of parking on-street (often unsafely) becomes the default choice.

### **Wind energy development**

In the current draft the question is asked whether the Local Plan should allocate any of the areas identified in Figure 6.5 and Figure 6.6. for wind turbines. The maps are derived from a desk-based

constraints-based study which appears inadequate given the previous experience of wind turbine planning applications. In particular there is a notable bias towards recognising ecology constraints (and additional consultation with the relevant bodies on that subject) that has not been echoed in the consideration of the area's heritage.

For example, it is very surprising to see in Fig 6.5 a proposal for a wind farm near Kingscourt Wood in Motcombe. This is within the heritage area of the old Gillingham Royal Forest (which included all of the parish of Motcombe), which as described earlier is currently the subject of substantial funding from the National Lottery following a successful bid by the Dorset Wildlife Trust, for a project to create interest in the history of this Forest and encourage landowners to recreate flora and fauna habitats. It is also close to the remains of Kingscourt Palace, once a hunting residence of King John and a scheduled monument. We feel this is an entirely inappropriate setting for such a proposal. We believe a precedent here might be the rejected proposal for a wind farm in the Tolpuddle area, where the previous proposals for a wind farm were shown as affecting heritage assets of international significance related to the Tolpuddle Martyrs and the nearby scheduled monument of Weatherby Castle.

There is apparently no clear buffer expressed for scheduled monuments (unlike the 3km buffer used for Grade I buildings) and whilst Natural England were consulted in regard to other sensitive sites, no such advice appears to have been sought from Historic England in respect of scheduled monuments or other heritage assets.

It is clear that further work on the heritage constraints is needed in order to refine the areas of search prior to making any decisions on this issue.

***(Dorset Plan Motcombe PC response Cllr PM 09-03-21)***