

Iwerne Minster  
Neighbourhood Development Plan  
Supporting Document  
~  
Consultation



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# Consultation

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## Introduction

We made email contact with many consultees.

## Statutory Bodies

North Dorset District Council

North Dorset District Council - Design and Conservation Team

Dorset County Council

Cranborne Chase AONB team

Homes and Communities Agency

Natural England

Environment Agency

Historic England

Highways England

Scottish and Southern Energy

Southern Gas Network

Wessex Water

## Local Parish Councils

Fontmell Magna Parish Council

Sutton Waldron Parish Council

Stourpaine Parish Council

Compton Abbas Parish Council

Melbury Abbas and Cann Parish Council

## Residents, Transport, Environment and Housing

Local housing associations via Paul Derrien of Dorset County Council

Age Concern

Dorset Community Transport

DT11 Transport Action Group

NorDCAT

Bus2Go

Dorset Wildlife Trust

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## Responses

### Dorset County Council

**From:** Richard C Dodson <[r.c.dodson@dorsetcc.gov.uk](mailto:r.c.dodson@dorsetcc.gov.uk)>

**Date:** 5 October 2017 at 10:40:54 BST

**To:** 'Arthur Evans' <[w.arthur.evans@hotmail.com](mailto:w.arthur.evans@hotmail.com)>

**Subject:** RE: Iwerne Minster Draft Neighbourhood Plan

Morning Arthur,

Thanks for the reminder. Having consulted various colleagues here at the County Council, as with the earlier consultation the following observations are made:

#### Highways (DM)

The comments made to the Neighbourhood Plan group have been included within the draft plan so there are no further comments in this respect.

Appendix A and the text within the plan refers to Steve Savage as working for the Highways Agency. This really ought to be the County Highway Authority so this needs a minor correction.

(The Highways Agency doesn't exist anymore as it was rebranded as Highways England – HE only deals with the strategic road network (SRN) which in their remit is Motorways and Trunk Roads on which your plan will have no impact)

#### Flood Risk

'As Lead Local Flood Authority (LLFA), we are the relevant RMA (Risk Management Authority) for Ground Water (GW), Surface Water (SW) and fluvial flooding from Ordinary Watercourses (OWC). As such, it is appropriate that we are consulted with regard to Neighbourhood Plans (NP). Major development as defined within Article 2(1) of the Town & Country Planning, Development Management Procedure, England Order 2015, requires that we be consulted as statutory consultee for SW drainage. It is therefore beneficial that we be consulted at this early stage.

Nevertheless, we are under no statutory obligation to review Neighbourhood Plans (NP), therefore you should consider our comments as discretionary only.

The proposal under consideration relates to Iwerne Minster's draft Neighbourhood Plan submission. As relevant RMA for the above sources of flooding, I have reviewed the following documents submitted in support of the NP:

☐ Neighbourhood Plan: Iwerne Minster Development Plan 2011-2031 – The Draft Plan

And offer the following comments:

☐ The above plan includes a flood risk section, where an extract of fluvial flood maps for the parish is provided. This section, however, lacks detail with respect to other forms of flooding that the community may currently be exposed to e.g. from SW or Ground Water (GW) etc. A NP is good opportunity for the parish council to include and provide their local understanding concerning flood risk. This might include infrastructure limitations, constraints along watercourses etc. This knowledge can then be taken into account by developers to better inform their designs.

☐ The authors may also wish to include pluvial flood maps and ground water constraint mapping, although this is usually available to developers via district level Strategic Flood Risk

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Assessments (SFRA), hence the focus should be on the group's knowledge of local flood risk, since theoretical flood extents have a number of limitations.

☐ Tables 3, 4 and 5 of the Strategic Environmental Assessment (SEA), provided some encouraging comment with respect to existing SW flood risk and Flood Risk Management objectives, however, we are not clear on how these objectives have been brought forward to enforceable policies, with the exception of the trout farm i.e. Policy 3.1, which specifically mentions a requirement for a Flood Risk Assessment (FRA).

☐ Well designed and considered development can help reduce surround flood risk, by increasing on site attenuation or infiltration and therefore reducing runoff rates to below their pre-development equivalents, this can help free up capacity within public sewer systems of land drainage networks. Planning policies that require betterment, can help us (DCC's FRM team), as statutory consultee for SW management, better substantiate an objection should a planning applicant not meet such a policy. Clearly, any requirement for betterment should be justified and explained within a neighbourhood plan, however, if possible, they can provide a useful tool for delivering increasingly sustainable development and should be considered.

The above observations should be considered when seeking to recommend / allocate land for development and when compiling a final NP.

## **Ecology (paraphrased )**

In consideration of previous comments, and with the inclusion of an ecological survey from DERC and increased the scope of the plan to include more ecological considerations no further comments are offered

I have received no other comments to date, if I do I will forward them.

I trust this is helpful

Regards

Richard Dodson MA, IEng, FIHE, MRTPI, DipMgt.  
Planning Obligations Manager  
Tel: 01305 228583

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## Dorset Councils Partnership Planning Policy

**From:** Allan Bennett

**Sent:** 15 October 2017 18:59:06 (UTC+00:00) Dublin, Edinburgh, Lisbon, London

**To:** [iverneNDP@hotmail.com](mailto:iverneNDP@hotmail.com)

**Cc:** Jo Witherden; [w\\_arthur\\_evans@hotmail.com](mailto:w_arthur_evans@hotmail.com)

**Subject:** RE: Iwerne Minster Draft Neighbourhood Plan

Dear Iwerne Minster Neighbourhood Planning Group,

First off, it is great to see the Neighbourhood Plan advance to this stage and I hope the comments provided assist you as it is taken forward.

There are a few areas of clarification (fact-checking) and some key recommendations which should assist the NP group in producing a robust submission plan. I have listed them as arising from the main document and supporting information.

1. For the submission version please include paragraph numbers by section for ease of reference.

2. The figure of 5,700 dwellings was established for North Dorset following best-practice and from an objective assessment of the districts housing needs. As set out in the Local Plan Part 1 and in subsequent advice the appropriate number of dwellings to be provided for in a Neighbourhood Plan should be established by considering local needs and the circumstances of each area, our recommendation is that NP groups consider best-practice approaches including the [Locality toolkit](#), we have not provided a pro-rata figure.

3. Local Green Spaces: it is advised that further consideration is given to the proposed designations for Local Green Spaces in order to fully address national [guidance](#) and [tests](#). There is currently insufficient evidence to justify their inclusion and it should be recognised that that after detailed assessment against LGS criteria not all of the currently proposed areas may be suitable for designation. The LGS supporting document contents currently describes existing IOWA areas as Current LGSs – this is incorrect and the distinction between the two needs to be made clear.

4. Housing Policy – see point 2 above – we have not advocated for a pro-rata approach to establish a local need figure. For submission the wording of these policies need to set out more clearly the proposed allocations and provisions - both 'proposed' and 'allocated' are currently used and the site-specific requirements on each site are not clearly identified. Policy 3.2 does not currently provide an implementable planning policy and should be reviewed to identify the policy approach to the School sites and refurbishment plan, the use of neighbourhood development orders should be discussed in greater detail with the Planning Policy team. 3.3 is not currently shown within the proposed settlement area in 3.10 but appears to be identified as an allocation. 5. The draft plan (and most noticeably the Housing section) does not make reference to the SEA process and how the recommendations have informed the production of the plan – it is vital that this is reviewed. Similarly it is not clear from the consultation documents how the initial sites brought forward for consideration have been assessed and preferred options identified, taking into consideration the findings of the corresponding SEA assessment, this also needs to be addressed.



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6. Strategic Environmental Assessment: The current assessment of alternative options is underdeveloped and does not set fully out the reasoning and basis for the conclusions reached, all sites (including those not-preferred) and options considered should be clearly set out and compared. I can confirm that we will progress the determination of the SEA screening, I will follow this up with Jo Witherden in order to ensure the latest information and responses from the statutory consultees are available for consideration.

It is clear that considerable work has gone into the preparation of the draft plan and supporting information and whilst there are some concerns raised we will continue to advise and assist the NP group as you work towards a submission version.

Given the stage of the plan and comments raised I would recommend that after reviewing all the consultation responses received a meeting with representatives of the NP group would be beneficial. Please let me know if this would be of use and do forward on any queries to me in the meantime.

Kind regards,

**Allan Bennett**

Planning Policy Officer

**Dorset Councils Partnership**

North Dorset District Council, West Dorset District Council and Weymouth & Portland Borough Council

Email: [allanbennett@dorset.gov.uk](mailto:allanbennett@dorset.gov.uk)

Direct line: 01258 484214

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## Environment Agency

**From:** "Holm, Michael" <[michael.holm@environment-agency.gov.uk](mailto:michael.holm@environment-agency.gov.uk)>

**Date:** 17 October 2017 at 17:25:01 BST

**To:** Arthur Evans <[w.arthur.evans@hotmail.com](mailto:w.arthur.evans@hotmail.com)>

**Cc:** "[jo@dorsetplanning.co.uk](mailto:jo@dorsetplanning.co.uk)" <[jo@dorsetplanning.co.uk](mailto:jo@dorsetplanning.co.uk)>

**Subject:** RE: Iwerne Minster Draft Neighbourhood Plan

Dear Mr Evans

Apologies for the delay in responding. I have reviewed the plan and have no objections or comments to make as the principles accord with local and national planning policy.

Yours sincerely



**MICHAEL HOLM**  
**Planning Advisor - Sustainable Places**

Planning Advisor for Dorset and South Somerset

Direct Dial: 02030 259358

Internal: 59358

Email: [michael.holm@environment-agency.gov.uk](mailto:michael.holm@environment-agency.gov.uk)

# Consultation

Historic England



Historic England

Cllr Arthur Evans  
27 Oakwood Drive  
Iwerne Minster  
Dorset  
DT11 8QT

Our ref: PL00169943  
Your ref:  
Telephone 0117 975 0680  
Fax 0117 975 0701

17 October 2017

Dear Cllr Evans

**re: IWERNE MINSTER NEIGHBOURHOOD PLAN**

Thank you for your consultation on the draft Iwerne Minster Neighbourhood Plan. Please accept our apologies for not getting this response to you by yesterday. Hopefully its contents will still prove useful.

We experienced software difficulties in completing the questionnaire kindly supplied but the nature of our comments would perhaps not comfortably fit within that format.

The focus of our attention is the proposed site allocations covered in Section 3 – Housing of the Plan. In previous communication we have highlighted the need to ensure that site assessments are properly informed by an understanding of the significance of relevant designated heritage assets, the aim being to avoid any harm to their fabric or setting. Where this might not be possible, all attempts at mitigation or minimisation of harm should be pursued, accompanied by a justification for that which remains on the basis of overriding public benefits.

In the case of Iwerne Minster we did not necessarily feel that the exercises required to accomplish this would need to be onerous and encouraged the involvement of North Dorset DC's conservation officers to help refine and substantiate with evidence the site selection process. This would be particularly useful where consideration of the Conservation Area is an issue, bearing in mind the absence of an associated Appraisal or Management Plan. I have attached this correspondence for information.

From the Plan and supporting documents it is clear that Kevin Morris was then involved. Reference to his advice on the potential of the site allocations to cause harm to heritage assets is referred to in some instances, although there does not seem to be a report from him as evidence which details his comments. It is therefore difficult to know what might have been stated in full – a point especially useful to



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know where his advice has been interpreted to suggest that some level of development on sensitive sites is possible - and the basis of such correlation as a narrative is unclear.

It is therefore probably useful to run through each site in turn to illustrate fully the outstanding heritage agenda:

1. Policy 3.1 The Trout Farm. No reference to heritage assets in the Plan. The SEA Report in its Summary Assessment of Site Options (Table 8, p17-) states that as it is outside the Conservation Area and unlikely to be viewed in the context of any known heritage asset that there would not be any demonstrable harm to them. No reference to input from Kevin Morris or any other heritage professional or evidential substantiation of this assertion, and, as necessary, to show that 6 dwellings in the configuration proposed is suitable.
2. Policy 3.2 Clayesmore School. Not actually a formal site allocation but the details associated with the sub-sites provide a firm development aspirational steer.
  - a. 3.2a Clayesmore Wood. Reference in the Plan to it lying opposite the Listed "The Talbot". Development unlikely to be acceptable.
  - b. 3.2b Devine House. Reference to Devine House as a Listed Building. Re-use/conversion acceptable in principle but NDDC conservation officers indicate that development within the grounds would be likely to cause harm to its setting and the character of the Conservation Area unless undertaken sensitively. What does this mean in a practical sense?
  - c. 3.2c Grounds of Church Path Cottages. Within the Conservation Area and development may impact upon the setting of nearby Listed Buildings. Conservation officers suggest that some limited development may be possible which is interpreted as suggesting 2 or 3 houses but the basis for this conclusion is unclear.
  - d. 3.2d The Old Village School. A Listed Building. Re-use/conversion acceptable in principle but the basis for suggesting additional development is unclear.
3. Policy 3.3 Miles Field. No reference to heritage assets in the Plan. The SEA states that as it is outside the Conservation Area and unlikely to be viewed in the context of any heritage assets there would not be any demonstrable harm. No reference to NDDC conservation officer advice or other heritage expert input. The basis for this conclusion is unclear.
4. Policy 3.4 The Old Bakery. The Plan and SEA refer to advice from conservation officers that development has potential for causing harm to the setting of the Grade I Listed Church of St Mary and undermining the character of the Conservation Area. The conclusion is that limited



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development is possible without causing harm but there is no evidence to substantiate this.

5. Policy 3.5 East of Orchard House. No reference to heritage considerations in the Plan. The SEA refers to the site adjoining the Conservation Area and unlikely to be viewed in the context of any heritage assets. But the SEA further states that development would need to be of an appropriate scale and form to avoid causing harm which suggests that harm could be caused. No information on what "appropriate scale and form" means or that 3 single storey dwellings are an appropriate interpretation. No reference to conservation officer advice. No reference to design/development acceptance criteria in the policy.
6. Policy 3.6 Thatchways. Observations the same as for 5. Above.
7. Policy 3.7 Lower Field Barn. No reference in the Plan to heritage considerations. The SEA states that the nearest heritage asset is over 500m away and there would be no demonstrable harm. This may be true but distance in itself is no indicator of an absence of potential impact on setting. No reference to conservation officer or other expert heritage input.
8. Policy 3.8 Woodlynch Fruit Farm. No reference to heritage considerations in the Plan. The SEA confirms part of the site's existence within the Conservation Area with the balance likely to impact on its setting. Mitigation measures identified to avoid harm to heritage assets but no clue as to how these have been determined. No reference to conservation officer or other expert heritage advice. No mitigation measures in the policy.
9. Policy 3.9 Brookman's Farm Bungalow. No reference to heritage considerations in the Plan. The SEA confirms the site's location immediately adjoining the Conservation Area and curtilage of Grade II Listed Bowhay. Assertion that any impact could be mitigated through sensitive design and a strong landscape policy but no evidence to demonstrate the basis for this. No reference to conservation officer or other expert heritage advice. No mitigation measures in the policy.
10. Table 6 of the SEA Report provides a Sustainability Assessment of the Plan's Objectives. Against "Cultural Heritage" all Objectives come out as Neutral or, the majority, Uncertain. This suggests that there is insufficient information or supporting evidence, or clarity or content in the Plan itself, to allow for a conclusion that the Plan will not cause unacceptable levels of harm to heritage assets.
11. Section 9.2 of the SEA Report, in referring to the Testing of the Plan's policies, states that the grading of the policies' likely environmental impact against sustainability objectives was based on assessing possible harm using "professional judgement". The basis of that professional judgement, in terms of the substantiation of the conclusions drawn for the allocation of the



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sites, remains unclear and in our view the Plan is unable to demonstrate an adequate level of conformity with national and local planning policy for the protection and enhancement of the historic environment.

We would therefore strongly encourage your community to address the points raised above. This is not necessarily an onerous task, and may only need to involve explicitly filling gaps from an evidence base which already exists but has not been fully referenced or made available.

We would wish to be able to offer the Plan our full endorsement at subsequent stages of its progress to being made. As the Plan stands however we are concerned that it will generate unjustified harm to heritage assets and are anxious to avoid having no option but to subsequently lodge formal objection.

Yours sincerely

David Stuart  
Historic Places Adviser  
[david.stuart@historicengland.org.uk](mailto:david.stuart@historicengland.org.uk)



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## Cranborne Chase AONB

Hello Arthur

Thank you for letting the AONB know your draft Neighbourhood Plan is available for consideration.

I am, however, a bit concerned by your consultation response questionnaire.

In relation to sections 1, 2, and 3 I am intellectually unhappy with the stark choice between 'support' and 'object'. Either option implies positively going with a choice when consultees may have much more nuanced responses. Consultees may, for instance, agree that a policy is relevant or appropriate without going as far as actively supporting the policy as worded. On the other hand consultees may object to the specific wording of a policy but not the main thrust of it.

The analysis of responses to sections 1, 2 and 3 of the form could be biased. The way it is set up forces respondents to show, unequivocally, 'support' or 'object' to a policy. Any moderation of that support or objection in the 'comment' box at the end would not be reflected in the analysis of the scores for the individual policies.

May I dare to suggest a third / middle way for the policy responses? A third choice for each policy could be 'see comment below'.

Regards

Richard Burden BSc DipCons MSc CMCMI(rtd) CMCIPD FLI PPLI

Chartered Landscape Architect

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

**Cranborne Chase Area of Outstanding Natural Beauty**

Shears Building, Stone Lane Industrial Estate, Wimborne, BH21 1HD  
Tel: 01725 517417

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## Wessex Water

**From:** Edward Dyke <[EDyke@symondsandsampson.co.uk](mailto:EDyke@symondsandsampson.co.uk)>

**Date:** 2 October 2017 at 11:17:11 BST

**To:** Iwernesprings <[info@iwernesprings.co.uk](mailto:info@iwernesprings.co.uk)>

**Cc:** "Arthur Evans ([w\\_arthur\\_evans@hotmail.com](mailto:w_arthur_evans@hotmail.com))" <[w\\_arthur\\_evans@hotmail.com](mailto:w_arthur_evans@hotmail.com)>

**Subject:** FW: Iwenrne Minster - Proposed Development Iwerne Springs, Iwerne Minster DT11 8QN

Dear Graeme,

Please see the email exchanges below and the attachments. I am copying Arthur Evans in on this for his information in relation to the Neighbourhood Plan.

Wessex Water do not see that there should be a problem or conflict between their sewage plant and the proposed development.

I have just chased Ken Hooper and he will confirm when the odour assessment will be able to be carried out shortly.

Should you have any queries then please let me know otherwise I will revert to you once I have heard from Ken Hooper.

Kind regards

Edward

**Edward Dyke FRICS FAAV**

**Partner, Professional & Agriculture Department**

Symonds & Sampson LLP, Agriculture House, Market Place, Sturminster Newton, DT10 1DU  
Tel: 01258 474261 Mob: 07787 128286 [EDyke@symondsandsampson.co.uk](mailto:EDyke@symondsandsampson.co.uk)



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**From:** Edward Dyke

**Sent:** 26 September 2017 11:18

**To:** 'Ken Hooper' <[ken.hooper@ergapc.co.uk](mailto:ken.hooper@ergapc.co.uk)>

**Subject:** FW: Iwerne Minster - Proposed Development Iwerne Springs, Iwerne Minster DT11 8QN

**Importance:** High

Dear Ken,

Further to your email dated 2<sup>nd</sup> August 2017 please would you see the attached email and confirm your fee for undertaking an Odour Assessment which needs to be on the edge of the proposed development site. As it transpires the small sewage plant on the edge of the fish farm is still active but Wessex do not see this as being a concern.

Please would you give me a call to discuss once you have digested this email.

Kind regards

Edward

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# Consultation

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**From:** Sarah Bull-Torreti [<mailto:Sarah.Bull-Torreti@wessexwater.co.uk>]  
**Sent:** 26 September 2017 08:46  
**To:** Edward Dyke <[EDyke@symondsandsampson.co.uk](mailto:EDyke@symondsandsampson.co.uk)>  
**Subject:** FW: Iwerne Minster - Proposed Development Iwerne Springs, Iwerne Minster DT11 8QN  
**Importance:** High

Our ref : ND/NC/ 2446

Dear Mr Dyke,

I refer to your letter of inviting comments on the above proposed development and advise the following on behalf of Wessex Water as sewerage and water supply undertaker for the area in question:

The site is in close proximity to Iwerne Minster Sewerage Treatment Works and is located within our sewerage protection zone.

Whilst the site is located within the area identified as having the potential for odour nuisance, whilst we do not believe the proposal will be unduly affected it should be noted that the proposal could be subject to odours from the normal operation of our works. We do however request that the developer is made aware of the possibility of odour nuisance.

There are no capacity issues.

## **Water Supply and Waste Connections**

New water supply and waste water connections will be required from Wessex water to serve this proposed development. Application forms and guidance information is available from the Developer Services web-pages at our website [www.wessexwater.co.uk](http://www.wessexwater.co.uk).

Further information can be obtained from our New Connections Team by telephoning 01225 526222 for Water Supply and 01225 526333 for Waste Water/

## **Separate Sewer Systems**

Separate systems of drainage will be required to serve the proposed development.

No surface water connections will be permitted to the foul sewer system.

Please find attached an extract from our records showing the approximate location of our apparatus within the vicinity of the site.

I trust that you will find the above comments of use, however, please do not hesitate to contact me if you require further information or clarification.

Kind Regards  
Sarah Torreti

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# Consultation

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**From:** Edward Dyke [<mailto:EDyke@symondsandsampson.co.uk>]

**Sent:** 22 September 2017 10:08

**To:** Jessica Cliffe <[Jessica.Cliffe@wessexwater.co.uk](mailto:Jessica.Cliffe@wessexwater.co.uk)>

**Subject:** Iwerne Minster - Proposed Development Iwerne Springs, Iwerne Minster DT11 8QN

**Importance:** High

Dear Jessica,

Further to our conversation I now attach a copy of a location plan and the proposal contained in the Neighbourhood Plan. Please note the reference for the need for an odour assessment. The site will hold 6 dwellings.

Your first, smallest, sewage plant is located to the west of the proposed development and we would appreciate your thoughts in respect any issues that you may have and if you consider that odour is likely to be an issue. We have secured a quote for an odour assessment to be undertaken but would appreciate your thoughts before moving forward.

We will also be looking to connect into the mains drains and please confirm if there is capacity.

I look forward to your feedback at your earliest convenience.

With kind regards

Edward

**Edward Dyke FRICS FAAV**  
**Partner, Professional & Agriculture Department**

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