

PIMPERNE NEIGHBOURHOOD PLAN 2016-2031

Submission Consultation (11 May to 22 June 2018) – Summary of Representations

Rep #	Respondent	Summary
PIM01	Blandford Forum Town Council	<p>The Blandford+ Steering Group representing Blandford Forum Town Council, Blandford St Mary Parish Council and Bryanston Parish Council offer the following points for consideration. Page 1 makes reference to the need for new employment land without any identified suitable space within the Parish of Pimperne. This is fully in accordance with the revised Blandford + Plan which seeks development land for employment purposes to the North of Blandford and therefore easily accessible for residents of Blandford and Pimperne. Page 1, para 7 refers to the ‘fragile gap’ between Pimperne and Blandford and this term is used again within the Plan. It is not clear what this fragility is, and no further clarification is given. There is no obvious reason why this open agricultural land is any more deserving of special status than any other similar land surrounding the village. On page 4 para 1 it states that Pimperne is less than a mile from Blandford which rather infers the two communities are almost on top of one another. It is generally accepted that distances from adjacent communities are measured from centre to centre and a Parish Church is often at the heart of historic development. The distance between the church of St Peter & St Paul in Blandford and St Peter in Pimperne is precisely 4.6km or closer to three miles than the one mile stated in the Plan. On page 18 reference is made to the village being reliant on some services in Blandford. Pimperne currently has a primary school and two pubs. It would be more accurate to say almost all services, including local Hospital, Surgeries, Dentists, Leisure Centre, Post Office, Sports Clubs, Library Secondary School and shops are provided in Blandford.</p>
PIM02	Dorset County Council	<p>-The penultimate paragraph of page 5 mentions biodiversity and the site allocations (HSA1-3) pick up the requirement for biodiversity mitigation in their site-specific criteria, as well as the measures identified in the ecology surveys. Whilst the plan relies therefore, page 5, on Local Plan and national policy it is considered that it would be clearer, and simpler in not relying on a reader having to refer to such LP or national policy if text or policy be introduced to ensure the Plan complies with national and international legislation such as the Wildlife and Countryside Act, 1981 and the Conservation of Habitats Species Regs, 2017. Similarly The NERC Act, 2006, confers a duty to consider biodiversity through planning and it would be expected that a Neighbourhood Plan would contain information on what protected/priority species and habitats are contained within the Plan area as well as information on how impacts on species/habitats will be avoided, mitigated and compensated for (including enhancements), in line with NPPF, 2012. Any development must be assessed through the Dorset Biodiversity Appraisal Protocol and the Dorset Compensation Framework as these processes will ensure that impacts on wildlife will be avoided, reduced or mitigated against, while securing compensation as a last resort where there</p>

		<p>is still residual loss The Plan should mention these processes as part of the consideration of protection of biodiversity.</p> <ul style="list-style-type: none"> - LGS gives land the same 'status' as Green Belt NPPF 78. – The plan needs to make sure that the LGS designation meets the basic #77 test 77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: <ul style="list-style-type: none"> •where the green space is in reasonably close proximity to the community it serves •where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife •where the green area concerned is local in character and is not an extensive tract of land <p>The plan group may have overlooked the unforeseen consequence of a designation for LGS and may wish to consider allowing in the policy for development which enhances or is ancillary to the purpose for which the land is used in the first place. I suggest this because of the Green Belt status LGS imparts. There have been Green Belt appeals, albeit not in Dorset, where even very small structures have been deemed to be inappropriate GB development - one related to lighting columns at a pub, another to allotment sheds, another to sports facilities. Going through the exceptional circumstance 'hoop' for development which would enhance or is ancillary to the space, when it could be avoided through careful policy wording, seems a sensible approach. The LGS policy really needs the caveat to allow development which is ancillary to, or enhances the purpose for which the LGS is allocated. Even if it wasn't an issue this would avoid any doubt</p>
PIM03	Gladman	<ul style="list-style-type: none"> -Summarises legal requirements and national policy -Relationship to Local Plan To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, Neighbourhood Plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The current adopted plan that covers the Pimperne Neighbourhood Plan area and the Development Plan which the PNP will be tested against is the North Dorset Local Plan Part 1, adopted in January 2016, covering the period 2011 to 2031. Policy 6 of the Local Plan sets out the strategic approach to housing provision in North Dorset District and states that the Council will seek to maintain a flexible supply of housing, making provision for at least 5,700 new homes over the plan period. The Council is in the early stages of producing a Local Plan Review which will replace both the Local Plan adopted in 2003 and the Local Plan Part 1 once in place. An initial Issues and Options consultation on the emerging Local Plan concluded on 22nd January 2018, with a further Preferred Options consultation currently scheduled for 2019. In light of the Council's emerging Local Plan proposals and the likely need to deliver a higher level of homes to meet North Dorset's full objectively assessed needs, Gladman recommend that sufficient flexibility should be written into the PNP's policies to respond to changing local circumstances, and to address the district's strategic development needs. The PNP should acknowledge the aspirations of the Council's emerging Local Plan, including its preferences for the future direction of growth within the settlement. -Policy LGS: Local Green Spaces Policy LGS identifies 5 tracts of land proposed for Local Green Space designation. The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that for Green Belt land. As such, the Parish Council's should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation. The Framework is explicit in stating at paragraph 77 that 'Local Green Space designation will not be appropriate for most green areas or open space'. With this in mind, it is imperative that the plan makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used: <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is

		<p>demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green area concerned is local in character and is not an extensive tract of land. Gladman have been unable to identify any evidence to support the designations set out within the NP. We suggest that that the Parish Council take the time to revisit the policy and provide robust and justified evidence to support the inclusion of the proposed designations.</p> <p>- Policy LDC: Locally Distinct Character Policy LDC sets out a list of design principles that development in the NPA is expected to adhere to. Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. Whilst, Gladman note that the NP seeks to define different design criteria for developments in each of the 8 defined areas, there will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the NPPF which states that: "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles".</p> <p>- Policy MHN: Meeting Housing Needs Policy MHN states that provision is made for between 40 to 45 dwellings over the 2016 and 2031 plan period. The policy goes on to state that development of these dwellings should be on land within or adjacent to the settlement boundary. Gladman have been unable to identify sufficient evidence, including the details set out in the Housing Needs Assessment, to support a cap on development in this manner. Gladman suggest that wording of Policy MHN and its supporting text should explicitly state that the figures of 40 to 45 dwellings are not intended as a cap on development, and, should it become evident that further growth is needed, the plan is supportive of sustainable development opportunities in addition to the identified allocated and reserve sites.</p> <p>-Conclusions Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the PNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area. Gladman is concerned that the plan in its current form does not comply with basic conditions(a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.</p>
PIM04	Hall & Woodhouse	<p>1.1 These representations are submitted on behalf of Hall & Woodhouse Ltd to the Submission draft Neighbourhood Plan for Pimperne. Hall & Woodhouse Ltd own two public houses in the village: The Anvil Inn, Salisbury Road – pub and restaurant with rooms The Farquharson Arms, Salisbury Road – pub with restaurant</p> <p>1.2 Hall & Woodhouse Ltd is a brewer and owner of an estate of over 200 pubs. To fund its business and support its pub estate, the Company seek to use its surplus land to generate funds to reinvest in its pubs and businesses, including improving existing stock and acquiring new pub sites.</p> <p>1.3 These representations follow on from earlier representations to both the Options Draft and the Pre-Submission Draft versions of the Plan. Regrettably, and despite requests, the Parish Council has not offered Hall & Woodhouse the opportunity to work with them to progress the Plan and respond to their concerns. .</p> <p>1.4 In the</p>

draft Plan, both buildings are noted as key local buildings and valued community facilities. No objection is raised to these designations and indeed, support is given to Policy CF: Community Facilities which seeks to support proposals for development that facilitate these assets to modernise and adapt for future needs.

-3.0 MAIN REPRESENTATIONS 3.1 The objections raised by Hall & Woodhouse relate to the following two key matters: Settlement Boundary Change Policy SB and Map 5 3.2 We consider that the proposed redrawing of the settlement boundary is an inappropriate change which does not follow fundamental and sound planning principles, and fails the basic conditions tests for the following reasons. 3.3 The village of Pimperne, and as shown on the 1888-1913 OS map on page 6 of the draft Plan, has historically developed along the valley floor and on both sides of the A354. This is an essential part of the existing character of the settlement and should continue to be recognised in the drawing of the settlement boundary. 3.4 The Farquharson Arms is recognised as a locally important building as part of a distinctive grouping of buildings 'where the stream crosses the road, marking the southern 'entrance' to the historic core along Church Road' (page 12). This again re-confirms the importance of the Farquharson Arms and adjoining buildings on the east side of the road to the historical development of the village and to its existing character and appearance. These buildings should therefore continue to be part of the settlement and fall within the settlement boundary. (See also Map 4a). 3.5 Policy CF lists the Farquharson Arms as a key community asset in the village of Pimperne. If it is indeed included and considered to be a key community asset in the village, it should also be within the settlement boundary as existing; that is, part of the village. 3.6 Page 28 sets out the reasons for the revised settlement boundary but these reasons are flawed, for the following reasons: i) Following clearly identifiable boundaries – the existing boundaries already follow these principles; ii) Excluding protected green spaces on the edge of the settlement – not relevant consideration to the exclusion of already built sites; iii) Exclude areas east of A354 where housing development unlikely to be supported. This is not considered to be an appropriate use of the settlement boundary to secure this objective and normal development management policies as set out in the adopted North Dorset Local Plan Part 1 and the Neighbourhood Plan would appropriately manage development proposals that would come forward. iv) The Basic Conditions statement is similarly flawed as the rationale for redrawing the settlement boundary is indicated to have been undertaken specifically in relation to housing development, and that is considered too limited an interpretation of the reasons for drawing settlement boundaries which should be considered in a more comprehensive manner to ensure that the Plan and the settlement boundary drawn will meet the full range of sustainable planning objectives. 3.7 Section 3 of the National Planning Policy Framework is clear that planning policies should support economic growth in rural areas and a prosperous rural economy, including the retention and development of local services and facilities. The exclusion of existing development, including existing community facilities from the settlement boundary is in direct conflict with securing this objective. The draft Neighbourhood Plan therefore fails the basic conditions test in this regard.

- 3.8 The North Dorset Local Plan Part 1 together with the policies in the Neighbourhood Plan provide a comprehensive framework of development management policies to guide and steer new development; it does not require the redrawing of the settlement boundary. 3.9 The redrawing of the settlement boundary to exclude existing development (The Farquharson Arms) which is found elsewhere in the Plan to make a valuable contribution both to the range of community facilities as well as the character of the village does not support and promote sustainable development and conflicts with the National Planning Policy Framework objectives and Policy 1 of the North Dorset

		<p>Local Plan Part 1; it therefore fails the basic conditions tests as set out above. Policy MHN: Meeting Housing Need And Map 5 3.10 Objection is raised to the exclusion of land at the Farquharson Arms as a potential housing site, particularly given that it was accepted by North Dorset District Council under an earlier SHLAA exercise. The Neighbourhood Plan team appears to have dismissed the opportunity for a modest amount of new housing on the site (see page 21) on the grounds of impact on the pub itself, but they have never set out any reasoning for this assertion. The rationale for a modest residential development in the grounds of the pub is in fact to help support its future. Hall & Woodhouse Ltd, reflecting their extensive experience as the owner and manager of a large pub estate is confident that a small development to the rear, making use of underutilised land, while retaining the pub is feasible and would help support the commercial viability going forward. A modest scale of development would therefore be in accordance with the objectives and policy wording of CF and would accord with the sustainable development objectives to help secure a prosperous rural economy. 3.11 The other concerns are more matters to be addressed at the stage of a planning application; they are not reasons to pre-judge the potential opportunity for a modest scheme. 3.12 The Neighbourhood Plan sets out that a key concern of local residents relates to traffic and road safety. However, the proposed housing sites are all at the edges of the village on its western side. As a result, they will all bring additional traffic and congestion to the main village streets, rather than helping to reduce it. By contrast, appropriate development on the east side of the A354 has the following advantages: • Easy access direct onto the A354, whilst within easy walking distance of the main village facilities and therefore reducing the need for traffic to use the roads to the west of the A354. • By increasing the amount of development on the east side of the A354, this will offer opportunities to improve crossing opportunities of the main road and help to slow traffic down as it passes through Pimperne. 3.13 It is noted that a number of representations on the earlier Options draft raised similar points in support of appropriate development on the east side of the A354. 3.14 The redrawing of the settlement boundary and the exclusion of land at the Farquharson Arms fails the basic conditions tests in terms of promoting sustainable development, which includes the objectives in the Framework as well as in the North Dorset Local Plan Part 1 to secure a prosperous rural economy -4.0 SUGGESTED MODIFICATIONS TO THE NEIGHBOURHOOD PLAN 4.1 Hall & Woodhouse Ltd wish to seek modifications to the Neighbourhood Plan as follows in order that it can meet the basic conditions tests: a) Reinstatement of the settlement boundary as set out under the NDDC Local Plan Part 1; and to include the Farquharson Arms and adjacent development, for the reasons set out in Section 3; b) Amendment to Policy MHN to delete reference to west side of the A354 as the proposed location for new houses. c) Inclusion of land at the Farquharson Arms as an opportunity for a modest residential development to support the future of the public house as a community facility. 5.0 CONCLUSION 5.1 The Examiner is therefore requested to find in support of the proposed Modifications set out in these representations in order that the Plan can meet the basic conditions tests and progress to referendum.</p>
PIM05	Historic England	<p>We note from the Consultation Statement that the community was in touch with the Council's conservation team in response to our Regulation 14 comments. We therefore assume that all heritage issues associated with the Plan, and its site allocations in particular, meet with the approval of the Council and this is therefore to confirm that we are happy to defer to your authority in the resolution of any outstanding matters.</p>
PIM06	Natural England	<p>Dorset Biodiversity Protocol Natural England welcome the inclusion of policies relating to biodiversity, specifically the requirement for an approved Biodiversity Mitigation Plan for allocated sites and have the following recommendations; •</p>

		<p>Amend text to show the updated name of “Biodiversity Mitigation and Enhancement Plan”. This better indicates the requirement of development to enhance the natural environment, in line with NPPF paragraphs 7, 109 and 118. • The Dorset Biodiversity Protocol is recommended for all development sites over 0.1ha or where there is likely adverse impact to biodiversity, regardless of the proposed use. As such we recommend that Policy MEN is amended to reflect this requirement. Localised biodiversity enhancement opportunities The Neighbourhood Plan states that it does not cover all subjects and lists protection of wildlife as one of those already covered in the North Dorset Local Plan. In this case, we advise that there are specific, localised environmental objectives that the North Dorset Local Plan is unlikely to detail in its next iteration which would be better suited for inclusion in the Pimperne Neighbourhood Plan. Natural England have identified a species (protected under section 41 of the Natural Environment and Rural Communities Act, 2006, section 5 of the Wildlife and Countryside Act, 1981 and is an ICUN Red Data Book species listed as Endangered), the Barberry Carpet moth, which is nationally scarce and has a stronghold in the area around Pimperne. Through various channels we and other nature conservation organisations are working to strengthen the remaining populations of this very rare species, which includes planting of Barberry (<i>Berberis vulgaris</i>). We would encourage you to consider this unique aspect of the biodiversity of the Neighbourhood Plan area and the potential for enhancement and expansion of the species through requirement or highlighting of the benefits of planting of Barberry in future developments within the plan area.</p>
PIM07	North Dorset District Council	<p>The submission version of the Plan appropriately seeks to deal with issues of a local nature including the built and natural environment, the local economy and proposed allocations to meet local housing needs. In general the Plan and policies are well drafted and justified. NDDC also acknowledge and support the on-going projects noted in the plan.</p> <p>- Policy LC: Landscape Character The wording of part a) should be amended to better reflect the North Dorset Local Plan Part 1 (LPP1) Policy 4: “All new development within the plan area must demonstrate that account has been taken of the relevant AONB Management Plan policies and must not detract from the special qualities of the Cranborne Chase and Dorset AONBs unless it is clearly in the public interest to permit the development.” Policy MHN: Meeting Housing Needs NDDC note that the proposed allocations for up to 45 dwellings is in addition to those proposals already with consent (10 dwellings) and an allowance for 1 or 2 further dwellings and that the SEA has considered the potential cumulative implications of these. The expected phasing of HSA3 as a reserve site is considered to provide a degree of flexibility to the plan to meet local housing needs over the plan period. Policy DC: Developer Contributions for Social Infrastructure The wording should be amended to “... provision of social infrastructure projects including:” as other CIL regulation 122 compliant obligations or projects may be necessary. Policy HSA1: land east of Franwell Industrial Estate It is not clear from part f) what improvements will be necessary to achieve safe pedestrian access, it is recommended that the wording is amended to: “Any necessary improvements required to achieve safe pedestrian access to Pimperne Primary School and along Down Road into the village should be secured following consultation with the Highways Authority”. Similar wording should be applied to Policy HSA2 e).</p>
PIM08	P & D Crocker	<p>I am writing in response to your current Regulation 16 consultation on the submitted Pimperne Neighbourhood Plan. I act on behalf of P and D Crocker in representing their land interests at Hyde Farm, Pimperne. This representation will respond specifically to the following sections of the submission plan: • Plan period • Meeting housing needs • Location for new housing development</p> <p>Plan period The submitted Neighbourhood Plan sets out the period in which the plan intends to cover, stating that it will run through to 2031 in line with the current adopted North Dorset Local Plan Part 1 (LPP1). We are concerned that the proposed timescale for the plan does not cover a sufficient time period covering only 13 years if the</p>

plan is made in 2018. Whilst there is no statutory requirement or guidance on the time period over which Neighbourhood Plans should cover it would be appropriate for the Neighbourhood Plan to align itself with the Local Plan Review period to 2033. The Local Plan Review is looking at a new plan period running from 2013-2033 but in reality this is likely to be extended during the review period to 2036 to take account of the fact it is unlikely to be adopted before 2021 and the plan should cover a 15-year time horizon. It is suggested that the Neighbourhood Plan takes this opportunity to consider aligning with the plan period of North Dorset's Local Plan Review to 2033. Meeting Housing Needs North Dorset District Council publicly announced in July 2017 that due to circumstances beyond the control of the Local Planning Authority it no longer has the 'five year housing land supply' that is essential in controlling planning applications that aren't in line with its adopted Local Plan. It acknowledged that the supply had fallen to 3.42 years and because of this reduced supply the national presumption in favour of sustainable development would apply. This announcement also rendered the housing policies in the adopted Local Plan 'out of date' as indicated by paragraph 49 of the National Planning Policy Framework (NPPF). The Neighbourhood Plan as submitted for examination is based upon out of date housing policies in the current Local Plan and out of date housing figures. If the Neighbourhood Plan is made later this year, as currently drafted, it will need to be immediately reviewed as the housing needs policy MHN is based upon out of date evidence in LPP1. North Dorset District Council adopted its current Local Plan in January 2016. LPP1 covers the period 2011 -2031. The Council is currently in the process of a Local Plan Review under the recommendation of the Inspector who examined LPP1. This requirement was imposed on the Council to take account of new evidence including housing need evidence detailed in the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA) which identifies an Objectively Assessed Housing Need (OAN) of 330 dwellings per annum for North Dorset. In addition to the updated evidence in the 2015 SHMA, the Government is in the process of introducing a new standard methodology for assessing housing need through amendments to the NPPF and Planning Practice Guidance (PPG) as previously suggested in its consultation document 'Planning for the right homes in the right places: consultation proposals'. These amendments are expected in the summer of 2018 and would see North Dorset's housing requirements rise from 285 dwellings per annum in the current Local Plan to 366 dwellings per annum. The Council is at an early stage of the local plan review but nevertheless is planning for a significant increase in the number of houses it is required to deliver as a result of the new housing need methodology. North Dorset recognised that 366 dwellings per annum is the level of housing need that it should appropriately plan for in its Local Plan Review Issues and Options Consultation document November 2017. The continued progress with the Neighbourhood Plan in advance of taking account of new housing evidence currently under consideration by North Dorset District Council in its Local Plan Review would be premature. The Neighbourhood Plan sets out on page 16 that 'the estimated housing need for Pimperne based on a 'pro-rata' proportion of the rural areas target in North Dorset Local Plan would be 39 dwellings for the period 2015 -2031' It is not clear from the Neighbourhood Plan whether the methodology of proportioning out on a pro-rata basis to the villages, the countryside target of 825 dwellings has been agreed. We do not consider the approach to dividing the local plan figure out on a pro-rata basis to be a sound approach to distributing development in the countryside. The settlements in North Dorset beyond the four main market towns have a significant degree of variation in their levels of sustainability (based on population, access to facilities and services and proximity to larger settlements) and therefore their ability to accommodate new development. Pimperne is one of the more sustainable and larger villages in North Dorset and located in close proximity to Blandford Forum. It is therefore reasonable to expect that it would need to take a higher proportion of any identified countryside requirement than smaller settlements in the

		<p>District. The Local Plan Review and future housing requirement context explained above will see a marked increase in the number of houses required across the District. This will also translate into a higher requirement beyond the four main market towns and could even lead to a change in the spatial distribution of development at a strategic level to ensure a deliverable strategy is adopted. In any case, the number of homes required in Pimperne is expected to increase and therefore the Neighbourhood Plan should look to increase its housing needs in line with projected increases in housing requirements and allocate more sites to ensure that it can meet these needs. The Government's advice in the PPG indicates that "A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic conditions." The housing policies in the current development plan in force however, are out of date, as a result of the Council's established lack of 5 year housing supply, and the Council was committed to an immediate Local Plan Review by the previous Local Plan Inspector. The Local Plan Review has commenced and the Council is in the process of developing a new plan based upon updated evidence and it is therefore important to consider how this should influence the consideration of the emerging Neighbourhood Plan. The Government's advice in the PPG is clear on this point and indicates that Neighbourhood Plans can be developed before or at the same time as the Local Planning Authority is producing its Local Plan but states that "Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example up to date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development." In the case of the Pimperne Neighbourhood Plan it is clear that it has not had regard to the most up-to-date reasoning and evidence that is informing the Local Plan Review. The Neighbourhood Plan's housing need policy does not reflect the increased housing requirements of the 2015 SHMA or the new government methodology for calculating housing need. Furthermore, its housing need is established on a pro-rata approach to distributing housing in the countryside which fails to take account of the fact that some settlements will be more sustainable than others and capable of accommodating a higher level of development. Location for new housing development We object to the Neighbourhood Plan's approach to the preclusion of any housing development to the eastern side of the A354. The landscape setting and settlement form chapter notes that 'The A354 road is the main corridor of movement through the area. The road has been engineered to keep traffic flowing along this strategic route (and it is heavily trafficked). So although busy it does not act as the 'high street' but is more akin to a bypass, and the presence of farm buildings and fields fronting onto its eastern side reinforce this distinction. The AONB advisor noted that the green, west facing slopes along the main road are important in maintaining the rural character of that part of the village.' Development on land to the east of the A354 has been resisted and excluded from the settlement boundary based on potential landscape impact on the AONB and the rural character it affords to the village. There is however already a degree of presence of built form to the east of the A354 which is historic and dates back more than 150 years. This built form in fact defines part of the historic character of Pimperne and some additional development on the eastern side of the road would reinforce the former ribbon pattern of the settlement that developed along the Salisbury Road. Given the rising nature of the land to the east, the extent of feasible development would be limited to the road frontage and therefore the visual impact on the AONB landscape would be limited with development set in the foreground of rising land behind. We are of the opinion that development to the east of the A354 could be designed in a sensitive manner to reflect the local distinctiveness of Pimperne with minimal intrusion to the quality of the AONB</p>
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landscape. We suggest that additional opportunities on the eastern side of the A354 should be considered to meet the likely increase in the housing needs of the Parish, The Neighbourhood Plan presents the opportunity to review where this additional housing should be directed to ensure the plan contributes to the achievement of sustainable development. We object to the exclusion of any residential development opportunity to the east of the A354 and believe the approach to Policy MHN: Meeting Housing Needs should be amended to allocate additional sites for residential development in Pimperne to the east of the A354. This would assist with achieving the rising housing requirements that currently remain unplanned for in the Neighbourhood Plan. P and D Crocker is disappointed that land to the south and east of Hyde Farm, Pimperne has been excluded from the Neighbourhood Plan allocations. The Pimperne Neighbourhood Plan Strategic Environmental Assessment – Submission Stage Report indicates that the sites have not been advanced primarily due to their visual impact on the AONB and concerns regarding crossing of the A354. As stated above the character of Pimperne has historically seen built form on the eastern side of the A354. We would suggest that there is a solution to designing a quantum of development that would respect and reinforce the local character of Pimperne without causing harm to the AONB landscape. Any development on these sites would be viewed against a back drop of rising land and when viewed from across the valley would be seen in the context of the existing village and the A354 without affecting the rural character of the village. A sensitive design solution is achievable on these sites and taking them forward as allocations in the Neighbourhood Plan would assist in meeting the increased housing needs of the future. In respect to the crossing of the A354 it is noted that the local concerns were not shared by the County Highway Authority who did not consider the impact to be severe. Nevertheless, there is scope to consider the provision of a pedestrian crossing over the A354 as off-site highway improvement works as part of any residential development proposal submitted in the future to address any significant highway impact. For the above reasons we consider that the land to the south and east of Hyde Farm, Pimperne should be reconsidered as an allocation in the Neighbourhood Plan as part of the examination process.

Summary In summary we raise objection to the Neighbourhood Plan as we consider that the housing needs are not in accordance with the current evidence and do not plan for the increases in the Governments new methodology for calculating housing need, that the pro-rata distribution is an unsound basis for establishing the number of houses Pimperne should be planning for and that the preclusion of development to the east of the A354 is unnecessary. Furthermore, we consider that land to the south and east of Hyde Farm, Pimperne should be considered for allocation to meet the shortfall in the housing requirements as the issues for its exclusion can be addressed through a sensitively designed proposal and through consideration of pedestrian crossing solutions. Further all ocations in the Neighbourhood Plan would assist with meeting the increasing housing needs in the District which translates to increased needs in Pimperne. The PPG sets out the basic conditions required of a Neighbourhood Plan before it can be put to referendum and these are that; • Having regard to national policies and advice contained within the guidance issued by the Secretary of state it is appropriate to make the Neighbourhood Plan; • the making of the Neighbourhood Plan contributes to the achievement of sustainable development; • the making of the Neighbourhood Plan is in general conformity with the strategic policies contained within the Development plan for the area of the authority. As a result of the concerns raised relating to the housing policy in the Neighbourhood Plan with respect to its overall numbers and its approach to pro-rata distribution, the clear indication in national guidance that evidence informing the Local Plan process is likely to be a relevant consideration of the basic conditions and the Neighbourhood Plans failure to consider increasing housing requirements under the Local Plan Review, we suggest that the Neighbourhood Plan fails to meet the basic conditions.

		Specifically that the Neighbourhood Plan fails to have regard to national advice contained within the PPG and the plan would not contribute to the achievement of sustainable development as it would fail to plan for the increasing housing requirements.
PIM09	Sir David Latham	1. See the representations my wife and I made at the consultation stage. 2. As far as housing need is concerned, we reiterate the concern that the need has been based on a pro rata distribution of the putative need generally in North Dorset as originally identified in the Local Plan which was not a proper assessment of local need, as required by the Local Plan, and in any event requires revision in the light of current proposals as to need on the one hand, and development and development applications since the adoption of the Local Plan on the other. The responses from the village have been coloured by the constantly repeated assertions from the Parish Council that the “need” is essentially a given, in accordance with government policy. 3. The inclusion of land north of Manor Farm Close will have a serious effect on the views of the village from the north, ie from the Higher Shaftesbury Road direction, which the Neighbourhood Plan itself recognizes as an important consideration, will impact the AONB, will adversely affect the Conservation area, and will therefore extend the village envelope into an inappropriate area.
PIM10	Wyatt Homes	<p>-The proposed allocation of the land north of Manor Farm Close is supported. The site represents a sustainable location for development and is a natural extension to the village. Wyatt Homes welcomes the opportunity to deliver a high quality development in keeping with the character of the village and the existing Manor Farm Close development. Our previous comments on earlier drafts of the plan highlighted the opportunity to extend the proposed housing site allocation to the west. This would provide a number of benefits including scope for larger rear gardens and landscape buffer planting along the western edge of the site. It would also allow greater flexibility for the layout to accommodate surface water attenuation as part of any sustainable drainage system</p> <p>- Policy MHN: Meeting Housing Needs proposed a target of 40-45 additional homes in Pimperne between 2016 and 2031 to meet the projected needs of the local community. It is understood that this is based in part on a ‘pro-rata’ proportion of the housing target for the rural areas in the North Dorset Local Plan. It should be noted that the housing target in the North Dorset District Plan is a minimum target. More recent evidence in the housing market assessment and emerging Government Guidance on assessing housing need suggests a significantly higher housing need across the District. The North Dorset Local Plan Review Issues and Options Consultation is proposing a 28% increase in the housing target from 285 dwellings per annum to 366 dwellings per annum. The proposed target in the Neighbourhood Plan should therefore be considered a minimum, with the risk that it may fall short of meeting the needs of the village and become out of date.</p> <p>-The settlement boundary shown on Map 5 of the Neighbourhood Plan does not include the proposed housing allocations. This raises the potential for conflict with Local Plan policies that restrict development outside settlement boundaries. Extending the settlement boundary to include the proposed housing allocations would improve consistency between Neighbourhood Plan and Local Plan policies.</p> <p>- Wyatt Homes support the identification of land north of Manor Farm Close as a housing site allocation, as set out in our comments on Policy HSA2. We note that the first paragraph on page 23 of the Submission draft plan indicates that the site allocations should be developed at different times across the plan period. We would like to highlight that the land north of Manor Farm Close is available now and Wyatt Homes are keen to deliver this site at an early stage in the plan period, this would also help address the wider shortfall in housing land supply across the District.</p>
PIM11	Wyatt Homes &	- Pimperne Neighbourhood Plan Submission Draft April 2018: Land at North East Blandford

Landowners	<p>These representations have been prepared on behalf of Wyatt Homes and landowners (The West Pimpeme Pool Trust, Mr C Coats and Mr T Coats) in relation to land that is being promoted for development to the north east of Blandford ('the site'). Part of this site to the south of Letton Park falls within the parish of Pimperne.</p> <p>Overall, we are supportive of Pimperne Parish Council's aspiration to adopt a Neighbourhood Plan, and in principle, we are supportive of the Submission Draft. However, we wish to provide some comments to positively address proposed growth at Blandford Forum, which we consider can be implemented with limited landscape impact, to meet the need for housing in a sustainable location and deliver a much needed primary school.</p> <p>The Site The site is located to the north east of Blandford Forum. It lies wholly within the administrative area of North Dorset District Council and mainly within the parish of Blandford Forum, however, a section of the site lies within Pimperne Parish. Please find enclosed a site location plan (drawing ref. 131_DI_01.2_redline plan) which should be read alongside drawing ref. 813-21-102 HDA 2 shows the Parish boundary.</p> <p>The site extends in total to approximately 17.5 hectares in size and comprises agricultural land with an area of allotments located within the site to the west of the A354 Salisbury Road. The southern boundary of the site is bound to the west by the A350 and to the east by the A354.</p> <p>The site is currently being considered in the Blandford + Neighbourhood Plan for residential led development.</p> <p>- Policy LC: Landscape Character</p> <p>Policy LC of the Submission Draft of the Neighbourhood Plan sets out how new development within the Neighbourhood Plan Area should respect the landscape character. Criteria g) of the policy sets out that "Development should not ... reduce the open nature of the gap between Blandford Forum and the village of Pimperne, as indicated on Map 2, and should respect the treed and distinctive character of Letton Park within this gap". While Map 2 of the Neighbourhood Plan identifies a 'gap' between Blandford Forum and Pimperne, we suggest it would be helpful if the map presented provides some clarity, for instance:</p> <ol style="list-style-type: none"> 1. We assume the magenta colour indicates the location of the gap, however, the boundaries of the gap are incomplete, and the purpose of the faded gradient is not clear. 2. The description of character becomes confused with the consideration of gap to the south of the village and the separation of the village from Blandford Forum. <p>We consider that the general description of the setting and settlement form of the village is accurate and correctly describes the relationship of the settlement with the Pimperne Brook and the surrounding open chalk downland landscape character.</p> <p>The open character of the downland landscape associated with the southern extent of the Cranbourne AONB and the setting to the village can be appreciated from the surrounding high ground to the east and west of the A354 and from the road corridor itself. The landscape to the west of the road corridor is open rolling farmland with extensive views across the AONB. Views south, from the road serving Manor Farm (photographs 1-3 located on Plan HDA 1), to the west of Pimperne, include views of open arable fields as far south as the parish boundary, beyond which rising ground and hedgerows preclude views of adjacent farmland and much of the northern edge of Blandford Forum. There is intervisibility between these fields, in the south-western part of the parish, and the village and they do form part of the wider setting to the village of Pimperne.</p>
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		<p>To the east the landscape and visual setting to the village is more localised and the landscape character of the land between Pimperne and Blandford Forum is more complex. The open downland character which forms the distinctive setting to the village extends to the northern boundary of Langbourne Park, the mature treed avenue which links Langbourne House with the A354 and Bingleton Wood (see Plan HDA 2). The setting to the village also includes the west facing slopes of the downland below the Blandford military camp to the east of the village. Photographs 4-6 and 1 illustrate the break in local landscape character and the extent of the visual envelope and setting to the village.</p> <p>The features that define the southern boundary to the setting to the village are not all within the parish but do form an integral part of the treed backdrop to the south and separate the village from the wider landscape and Blandford Forum to the south.</p> <p>The mature treed avenue, leading to Langbourne House, is within the parish and forms a noticeable break in the landscape when travelling south on the A354, the more wooded parkland landscape to the south of the avenue replaces the open downland. The significance of the avenue as a marker in the landscape and a change in character is reflected in its use as the southern boundary to the AONB.</p> <p>The parkland around Langbourne House and to a lesser extent Letton Park are well-defined features in the local landscape. The Langbourne parkland lies to the east of Pimperne parish, it forms an intact and rural setting to the Grade II listed building and provides wooded character to the south of Pimperne. The mature tree avenue is within the parish and forms an integral part of the Langbourne estate. Letton Park is less extensive and includes a number of recent properties built within the grounds of Letton House which although dating from 1855 is not listed. The main contribution the park makes to the local landscape lies in the mature trees that surround the houses and border the park, they add to the more enclosed character of the land south of Pimperne and assist in the separation between the setting of Pimperne and that of Blandford Forum.</p> <p>Land to the south of Letton Park is more open and lies within the visual envelope of Blandford Forum. The fields to the south of Letton Park, that lie within Pimperne parish have a strong visual and landscape association with Blandford and are not seen in the context of Pimperne village. In terms of the setting and settlement pattern of Pimperne, as described in the submission draft Neighbourhood Plan, land to the south-west of the parish, south of Letton Park does not form part of the setting to the village and is predominantly associated with Blandford Forum and its immediate hinterland.</p> <p>The consideration of gap as a policy should reflect ‘the space required to provide a clear visual and physical break in the built environment between two settlements which would allow the character and identity of each settlement to be retained’. Landscape character assessment at a local level can inform the process and assist in identifying appropriate landscape features as boundaries to a gap designation.</p> <p>The gap as set out in the draft Neighbourhood Plan includes all the land within the parish between Pimperne and Blandford Forum, essentially a blanket designation. The southern boundary of the gap policy proposed, east of the A354, follows the parish boundary which on the ground runs through an open field or follows a weak hedgerow boundary.</p> <p>The Neighbourhood Plan should identify the land that would constitute the essential gap between settlements that would allow the character and identity of each settlement to be retained and the definition of boundaries</p>
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which follow well-defined landscape features on the ground. HDA 3 illustrates a revised south-eastern boundary to the gap policy which follows well-defined landscape features and takes account of the landscape and visual characteristics of the landscape between Pimperne and Blandford Forum. The revised policy boundary includes all the undeveloped land that sits within the setting to Pimperne village and the land which sits between Letton Park and the tree avenue to Langbourne House which potentially could be in the visual envelope of the setting to the village in winter months. Land to the south of the proposed boundary, including Letton Park which already includes new development, is not essential to a gap policy and is not required to maintain the separate identity of Pimperne or its setting.

- Policy MHN: Meeting Housing Needs

Criteria a) of Policy MHN sets out that the Neighbourhood Plan makes provision to deliver an additional 40 to 45 dwellings in Pimperne within the plan period (2016-2031). The intention is that the proposed housing target will meet the projected local needs of the community. We understand that this figure is based in part on a 'pro-rata' proportion of the housing target for the rural areas of North Dorset and would politely note that housing targets should be recognised as a minimum and not a cap for development.

Recent evidence in the Strategic Housing Market Assessment (SHMA) and draft National Planning Policy Framework (standardised methodology for assessing housing need) suggests a higher housing need for North Dorset District Council. As such, the North Dorset Local Plan Review Issues and Options Consultation is proposing a 28% increase in the current housing target from 285 dwellings per annum to 366 dwellings per annum. In the Annual Monitoring Report (AMR) published in January 2018, the Council had a 5-year housing supply of 3.4 years. Furthermore, there has been a persistent record of under delivery in the North Dorset District and therefore they must apply a 20% buffer in accordance with the National Planning Policy Framework. In the context of the above, consideration should be given to increasing the Neighbourhood Plan housing target to reflect the need for sustainable growth, and specifically on the site North East of Blandford Forum.

New homes on the site could be delivered with limited landscape impact and without prejudicing the landscape gap between Pimperne and Blandford. Growth in this part of the Pimperne Neighbourhood Plan Area would relate positively to the settlement of Blandford, which ranks as one of four main towns in the adopted Local Plan settlement hierarchy and support much needed community infrastructure.

-Page 21 – Locations for new housing development and Policy SB: Settlement Boundary

The Pimperne Neighbourhood Plan recognises that the Local Plan strategy is to focus new residential development in the four main towns and larger villages within North Dorset District. It states that possible sites for new development located either side of the A354 in the gap between Blandford and Pimperne which were considered to be unrelated to the village of Pimperne were not assessed for inclusion in the Neighbourhood Plan. The Neighbourhood Plan acknowledges that this area could be a future option for the growth of Blandford Forum. The Blandford Forum + Neighbourhood Plan Group, and the emerging North Dorset Local Plan Issues and Options consultation, both consider growth to the north of the existing residential development in Blandford Forum. Therefore, we request that Pimperne Neighbourhood Plan considers development of the part of this site, which is within Pimperne Parish, to support the growth of Blandford. The site is considered to be a sustainable location for growth due to its relationship to the existing town of Blandford Forum which is well served by

		<p>facilities and services. Whilst the site lies only partly within the Pimperne Neighbourhood Plan Area, the whole site should be considered in the context of the relationship to Blandford Forum.</p> <p>The initial landscape and visual assessment of Pimperne village, that forms part of these representations, considers the relationship of land south of Letton Park with the settlement of Pimperne. That assessment confirms that land south of Letton Park is unrelated to the village of Pimperne or its landscape and visual setting. As an extension to Blandford Forum the site lies within close proximity to the town and would be consistent its settlement pattern and recent growth. The land within Pimperne parish is outside the AONB and the parkland and the treed, riverine character of the Pimperne Brook which provide a substantial landscape buffer between the site and Pimperne and the open downland landscapes to the north of the town.</p> <p>Summary</p> <p>We appreciate and respect the Neighbourhood Plan’s objective to retain a separate identity between Pimperne and Blandford Forum.</p> <p>However, we consider it is important to recognise that Blandford Forum, as a major settlement within North Dorset District, needs to accommodate strategic growth. We believe this can be accommodated sensitively whilst retaining an important landscape gap between Blandford Forum and Pimperne, consistent with the landscape character objectives of the Neighbourhood Plan.</p> <p>Given that a small parcel of land at North East Blandford falls within the Parish of Pimperne, to the south of Letton Park, we would encourage the Neighbourhood Plan to amend the housing target within Policy MHN to allow for additional housing led development to come forward, on the basis that it does not prejudice the important gap between the two settlements. This policy as currently drafted would be restrictive to sustainable development at Blandford Forum, which we believe can be delivered sensitively through a landscape-led approach to design.</p> <p>Whilst we appreciate that the Neighbourhood Plan is at an advanced stage, we would be grateful if the above comments are considered at the Neighbourhood Plan examination alongside earlier representations made on behalf of the landowners. Wyatt Homes would welcome the opportunity to discuss the above comments with North Dorset District Council and the Pimperne Neighbourhood Plan Group.</p> <p>- Attached maps and plans for the Site</p>
PIM12	Wessex Water	Thank you for your consultation and for the opportunity to comment on Pimperne’s Neighbourhood Plan. I can advise that the document has been reviewed by Wessex Water and we have no comments to make.