

# **Cranborne Chase Area of Outstanding Natural Beauty**



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Dear Mr MacGregor

## **The Pimperne Neighbourhood Plan Options Draft**

Thank you for giving the AONB the opportunity to comment on this Options Draft of the Neighbourhood Plan. Virtually the whole of the Neighbourhood Plan Area is designated as AONB except for a small area at Letton Park. The Nutford Area of the Parish is within the Dorset AONB.

For the record, I include below information that any policy document should be aware of about this Area of Outstanding Natural Beauty.

*The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital. This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' Objectives and Policies for this nationally important area. The national Planning Practice Guidance [Natural Environment paragraph 004] confirms that the AONB and its Management Plan are material considerations in planning.*

*The National Planning Policy Framework states (paragraph 109) that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes which include AONBs. Furthermore it should be recognised that the 'presumption in favour of*

*sustainable development' does not automatically apply within AONBs, as confirmed by paragraph 14 footnote 9, due to other policies relating to AONBs elsewhere within the Framework. It also states (paragraph 115) that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in these areas.*

The Neighbourhood Plan, Options version, is easy to read, easy to understand, and well presented. The AONB has a number of comments to make and they should be regarded as seeking to clarify matters and to enhance the document.

The **Summary** on page 3 notes that the gap between the village of Pimperne and the town of Blandford Forum is a fragile one. However very little is said on that topic elsewhere in the document. If there are crucial landscape or physical gaps between settlements, hamlets, or employment areas then it would strengthen the Neighbourhood Plan if they were discussed and identified more explicitly. The summary also mentions traffic through the village of Pimperne and the AONB offers a few words of caution ; traffic calming schemes have a great tendency to urbanise rural locations.

The **Introduction** to the Neighbourhood Plan is helpful, page 4, and it may make things clearer to state explicitly that it does need to be in conformity with the adopted Local Plan.

The introduction to the area, page 6, creates a positive picture of the Neighbourhood Plan area. I would, however **strongly suggest** that this is the place to emphasise the national importance of the AONB designation and the local responsibility for guiding the management of it. Incidentally, 75% of the AONB core funds come from central government via DEFRA.

Page 7 refers to focusing on growth to meet local, rather than strategic, needs. The **Vision and Objectives** then appear to focus almost entirely on the village of Pimperne. The AONB **advises** that it would be appropriate to include objectives for the wider area, including the Nutford and Letton Park areas as well as the open downlands and woodland.

Whilst acknowledging that the first objective is laudable I have to **advise** that it could apply to any countryside area. What seems particularly important for this Neighbourhood Plan is that virtually the whole of the area is nationally recognised and designated for its landscape, and the community are fiercely supportive of the management of the character and qualities of the environment in which they live.

Turning to the third objective, it is not entirely clear from the document whether the Neighbourhood Plan simply 'identifies' sites for development or more proactively 'allocates' sites.

I am confident that you understand the landscape setting and settlement form (page 8) is a section that is of particular interest to this AONB The AONB policy for Dark Night Skies is hinted at but I should mention that the latest satellite recording of light pollution indicates that Blandford Camp is the largest single source of light pollution within this AONB.

The AONB **agrees** with the comments about the 20<sup>th</sup> Century estates creeping up the valley's sides and the 'bypass' role of the A354. The gap between the village of Pimperne and Letton Park is touched upon but the gap between Letton Park and Blandford is not mentioned. The actual and potential impacts of adjoining development, such as Sunrise Business Park, are not mentioned.

The **Landscape Character policy** is **welcomed** and whilst the AONB **supports** this approach there are some detailed comments that could clarify and strengthen them. Open and green spaces, along with trees, are aspects of landscape character and I would **advise** that this policy should explicitly link to those issues. The AONB has produced a number of guidance documents in relation to colour in the landscape and agricultural buildings to mention two of them and your Neighbourhood Plan Group may find it helpful to refer to those documents in support of the proposed policy and further details of it.

There is a small topographical error in the second bullet point where 'us' should be 'use'.

Regarding woodlands I would **advise** that aspect of the policy should be enlarged to read *'all woodlands should be protected and managed to sustain them in the long term'*.

The element of the policy regarding avoiding harm to the sequence of views along Church Road seems to imply that development would be acceptable. Whereas the rest of the document seems to set out the opposite view. It may, therefore, be more appropriate to turn around the wording of the policy along the lines of *'development that would harm the sequence of views along Church Road will not be permitted'*.

The AONB finds that personal external lighting can be particularly problematic and the providers of street lighting and floodlights are becoming increasingly aware of the need to use appropriate fittings and limit the time lighting is on. It may, therefore, be appropriate to have a wider policy about lighting and it may be relevant to refer to the AONB's documents of this topic.

The policy to maintain the clear distinction between Blandford Forum/Letton Park and the village of Pimperne is **welcomed** but, as I have already mentioned, that appears to leave open the potentially contentious matter of development on the south side of Letton Park.

This Landscape Character policy seems to provide an opportunity to make statements about the protection, management and planning of the wider area of the Parish and the Neighbourhood Plan Group may wish to give this some attention. Clearly the open spaces within the village contribute to landscape character and that topic could be mentioned in the overarching policy statement which would then lead onto the more specific matter of important local green spaces.

In connection with the local green spaces, page 11, I think it would be more accurate to describe the sports field as being at the southern rather than the western entrance to the village. The text on the landscape context and setting mentions the eastern side of the A354 and it might be appropriate to include the green space between Hyde Farm and the Farquharson Arms as a local green space. That green, west facing, slope seems quite important in maintaining the rural character of that part of the village.

Moving forward to page 15 and **local character policy**; it seems that what was intended is a simple and straightforward statement that local character should be sustained. The policy might achieve that more clearly by putting the second element of the policy first and then identifying a need for long term management of the various features that contribute to local character. I would also **suggest** that at the start of the larger part of the policy is amended to read *'the location and design .....*'.

The first bullet point of that element of policy implies 'gentry houses' would be permitted whereas later on in the document the focus is very much on one, two and three bedroomed affordable houses.

The second bullet point referring to the adaptation of farm buildings only considers business needs when sometimes farmstead buildings are quite suitable for adaptation to live/work units.

The fourth bullet point about porches and chimneys being conspicuous seems to provide a bit of a hostage to fortune and to invite designers to provide substantial chimneys and porches that do actually stand out and draw attention to new developments rather than enabling them to integrate with the village scene.

The background information on **housing** is revealing, particularly the evidence that 45% of households are under-occupied. This seems to strongly reinforce the general assertion that the focus of housing provision within the Neighbourhood Plan area for the period up to 2031 should be on affordable housing. That would also tie in with the adopted AONB Management Plan. Looking at the first element of the housing needs policy there seems to be scope for misunderstanding between the first sentence and the last sentence. The first sentence refers to 'homes may be provided' whereas the final sentence refers to 'sites have been allocated'. The first element of the policy focusses on locational matters and I would **advise** that this could be the place to cross reference to the need for the location of new development to protect and respect open spaces and landscape character.

The second element of this policy seems to be one where the Neighbourhood Plan is allowed to go into greater detail than the Local Plan. It would, therefore, be permissible for the Neighbourhood Plan to state explicitly that the focus in the provision of housing up to 2031 would be on affordable housing.

The supporting discussion in relation to **employment** seems a little bit at variance with the proposal. The evidence is stated as not suggesting a general need for more employment sites. There is then a proposal to provide more employment land which simply seems the result of lobbying from one particular direction. Furthermore the resultant employment needs policy seems particularly open to interpretation. For example, in the first bullet point what does 'substantial' mean in connection with lorry movements? Does this mean no HGVs or does it mean a measureable number of small vans or is it a combination of all of these factors?

If the third bullet point of the policy is intended to relate to the AONB's attribute of tranquillity then perhaps it would be clearer to say that the concern is for the *'character and the tranquillity of the area'*.

A further point to try to avoid misunderstandings is that in the final comment on the bottom of page 17 I would **strongly advise** changing *'potential'* to *'real'*.

You are probably aware of the AONB's **concern** that communities within the AONB are losing their facilities, not because the villages are decreasing in size, but the economics mean that there is an ever increasing focus on financial returns. The AONB does therefore **strongly support** the retention of community facilities identified in the Neighbourhood Plan. Whether there is scope for using some of those facilities as a village hub that could accommodate part-time outreach facilities may be something the Neighbourhood Planning Group would wish to consider further. In relation to the **community facilities policy** the first sentence, as currently worded, provides no room for manoeuvre or negotiation. It seems that the current wording could mean that a proposal that has a number of shortcomings still has to be supported by this policy if it allows any of the community assets to modernise and adapt. Furthermore I would **suggest** that using the word '*allow*' is rather passive and that to include a term such as '*facilitate*' would be more positive and encouraging towards developers.

The second sentence of this policy also seems to have one word that could be problematic in future. The reference to any unnecessary loss clearly implies that there can be necessary losses without any further clarification. It may be simpler just to omit the word 'unnecessary' from the policy. Whilst it is inherent perhaps within the policy it does not explicitly state that development proposals could enhance the community assets.

**Infrastructure**, page 19, refers to traffic issues. As I have already mentioned the AONB has found that traffic calming schemes more often than not lead to the urbanisation of rural areas and that the loss of rural character is not offset by traffic being less intrusive. In the actual policy itself some words seem to be missing from the second element, there seems to be no explanation of what the low maintenance would relate to.

As page 20 discusses a range of **development locations** I **suggest** that the word '*suitable*' is omitted from the heading.

The AONB **agrees** with the assessment of the land to the rear of the Farquharson Arms. The AONB is, however, more than a little **concerned** that the sites investigated have not been whole objectively selected as there seems to have been a significant land owner element in the process. Furthermore, the AONB is **very concerned** that the base map for map 3, 'Possible and Discarded Sites' is not as up-to-date as all of the other plans used in the Neighbourhood Plan. This is of particular concern as this seems to be the fundamental map for this options document. In particular the extension some years ago of the Pyke site to the south east of the existing Taymix site, is not shown. Also the recreational area to the west of the village hall is not shown.

To respond to the table of potential sites the AONB **agrees** with the assessment of the discarded options. Nevertheless it is a little surprised that the lower ground to the east of Yard Farm, opposite the entrance to the Pyke site, has not been investigated as a possible employment site.

The assessments of the three housing sites are clear and helpful.

- Whilst there may be scope on the smaller part of the land adjoining Farnwill Industrial Estate there seem to be sound landscape reasons for restricting that to the smaller area.
- The land north of Manor Farm Close, and opposite St Peter's Close, does include one of the remaining flat areas in the village and it would seem appropriate to consider the use of that for sports purposes before giving it

significant support as a potential housing site. A single storey development could be achieved on the higher, western parts of the site but significant attention would be needed to landscape works to help integrate buildings there.

- The site at the top of Berkeley Rise seems to be the most problematic and least feasible of the three short listed. The elevated nature of the site and access issues seem to limit the potential of this site to even less than the Neighbourhood Plan indicates.

The AONB was very closely involved in the retrospective planning application for the extension of the Pyke site next to the Taymix site. The planning authority had significant reservations about the principle of extending the development and it was clear from the various discussions and negotiations that the permission, when granted, was done as an exemption. The current Taymix site does stand out from a number of locations and the extension of that site with further buildings would exacerbate that situation. In addition to the risks to the stream and the ground water source protection zone development would clearly be an extension of Pimperne Village southwards and a narrowing of the gap between Pimperne and the Letton Park Blandford area. The AONB **cannot support** the extension of the Taymix site as currently proposed.

As I have already indicated I think it would be valuable to have an explicit policy on important landscape gaps and similar features within the Neighbourhood Plan.

I hope these comments are helpful to you and I would, of course, be happy to discuss any of them with you or your group.

Yours sincerely

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For and on behalf of the CCWWD AONB Partnership

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