

21 December 2017

Pimperne Neighbourhood Plan Group
Pimperne Parish Council



Submitted by email: pimperne@dorset-aptc.gov.uk

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Dear Sir/Madam

I am writing in response to your current Regulation 14 consultation on the pre-submission draft of the 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 draft plan:

- Timescales, plan period and future reviews
- Meeting housing needs
- Location for new housing development

Timescales, plan period and future reviews

The Neighbourhood Plan pre-submission draft 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 plan is made in 2018 in accordance with the timescales set out on page 3 of the Plan.

Furthermore, the continued progress of the Neighbourhood Plan in advance of taking account of new housing evidence due to be considered by North Dorset District Council in its Local Plan Review would be premature and could result in a Neighbourhood Plan under examination that is based upon an out of date Local Plan and out of date housing figures.

North Dorset District Council adopted its current Local Plan in January 2016. LPP1 covers the period 2011-2031. The Council is currently undertaking a Local Plan Review at the recommendation of the Inspector who examined LPP1 due to a requirement to take account of new evidence including housing need evidence detailed in the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA).

In addition to the updated evidence in the 2015 SHMA, the Department for Communities and Local Government's recent consultation document 'Planning for the right homes in the right places: consultation proposals' would see North Dorset's housing requirements rise from 285 dwellings per annum in the current Local Plan to 366 dwellings per annum.

North Dorset District Council also publicly announced earlier this year 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.

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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 that could be imposed by central government in national policy as early as April 2018. We believe it would be inappropriate for the Neighbourhood Plan to proceed to submission based on housing figures that are in an out of date local plan and are likely to have increased significantly by the time the neighbourhood plan has been submitted for examination. For these reasons we are of the view that proceeding to submission with the Neighbourhood Plan as currently drafted in the timescales proposed could lead to significant problems in its examination process. It would be wiser to defer submission until the details of the new housing need methodology due to be imposed by central government next year are known and the implications of any increased housing requirement in North Dorset can be fully considered by the Neighbourhood Plan Group.

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

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 high degree of variation in their sustainability and therefore their ability to accommodate new development. Pimperne is one of the more sustainable and larger villages in North Dorset and therefore it is reasonable to expect that it would need to take a higher proportion of the countryside requirement.

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. 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 and allocate more sites to ensure that it can meet these needs.

The Neighbourhood Plan states in respect of Affordable Housing that *'Although in the Local Plan affordable housing can be built as exception sites outside the settlement boundary, it is anticipated that this should not be necessary as the need for such homes should be met on the development sites included in this Plan.'*

The principle of affordable housing exception sites is grounded in national policy in the NPPF as well as local policy. Therefore if it can be demonstrated that there is a local need for affordable housing and this can be delivered on a rural exceptions site the Neighbourhood Plan should not seek to preclude such delivery. It is noted that this statement is not translated into the housing needs policy MHN and therefore it is questionable whether it is even needed at all, particularly given the precedence the rural exception policy in the NPPF would have over the Neighbourhood Plan.

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.'*

The land to the east has been excluded 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 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 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 and the Neighbourhood Plan presents the opportunity to review where this additional housing should be directed.

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 in the District and additional opportunities that are designed sensitively are considered to the east of the A354.

Location for new housing development

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. It appears from the Pimperne Neighbourhood Plan Strategic Environmental Assessment – Options Stage Report 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 prior to its formal submission to the Local Planning Authority for examination.

Summary

In summary we raise objection to the Neighbourhood Plan progressing as drafted and consider its submission should be delayed. We consider that the housing needs are no longer in accordance with increases expected in the near future, 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 reconsidered for allocation as the issues for its exclusion can be addressed through a sensitively designed proposal and through consideration of pedestrian crossing solutions. Further allocations in the Neighbourhood Plan would



assist with meeting the increasing housing needs in the district which translates to increased needs in Pimperne. We would welcome the opportunity to discuss the opportunities that land at Hyde Farm, Pimperne could offer to the Neighbourhood Plan as it progresses further through the process.

Yours sincerely

A handwritten signature in black ink, appearing to read "Steve Clark".

Steve Clark
Associate

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