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NP Reps 22 December 2017.docx



Pimperne Neighbourhood Plan Group
Pimperne Parish Council

By E.mail
E: pimperne@dorset-aptc.gov.uk

Cliff Lane
E: clane@savills.com
DL: +44 (0)1202 856901
F: +44 (0)1202 856801

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir /Madam

**Pimperne Neighbourhood Plan
Regulation 14 - Pre-Submission Consultation**

I write in respect of the above on behalf of my clients the Davis Coats families, who as you know are pursuing proposals on land to the North East of Blandford, a significant part of which falls in Pimperne Parish.

This representation follows on from representations made on 17 October last year in respect of your Options Draft Plan. (Copy attached)

This representation will respond specifically to the following sections of the current draft plan:

- Timescales, plan period and future reviews
- The Character of the Village and Surroundings
- 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.

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.

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



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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 at least 2033.

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, which is not good planning.

The Character of the Village and Surroundings

The Davis Coats families strongly object to Policy LC g): Landscape Character. This policy seeks to ensure development does not:

reduce the open nature of the gap between Blandford Forum and the village of Pimperne, as indicated on Map 2, and the distinctive character of Letton Park within this gap.

Firstly, the need for a gap policy at all is questioned, when the current distance between Pimperne with the tight settlement boundary the Neighbourhood Plan promotes and the edge of Blandford Forum is so great. If a gap policy is to be considered its southern boundary should not extend to the Parish boundary taking in Davis Coats land and the built development of Letton Park. Including the Davis Coats land is a step too far, bearing in mind it is screened from Pimperne by Letton Park and existing dwellings fronting the A354. Including the built development of Letton Park in a gap policy is an absolute nonsense. If there has to be a gap policy, the southern boundary should be the northern boundary of Letton Park.

As to the gap policy protecting the character of Letton Park, there are other planning tools that can achieve this, for example if the Davies Coates land was allocated for housing development, a Neighbourhood / Local Plan policy could set criteria for the development and planning conditions could back up delivery.

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. Significantly, land in Pimperne borders Blandford Town Council's area, which is heavily constrained in meeting its own needs for additional housing and employment land.

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 not only into a higher requirement in the four main market towns and will inevitably lead to a change in the spatial distribution of development at a strategic level outside of those towns. 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.

Councils have a duty to cooperate in plan-making and Pimperne Neighbourhood Plan Group should not be planning solely for Pimperne's needs. The Group must co-operate with Blandford Town Council and North Dorset District Council and help in meeting the housing needs of Blandford, and the District as a whole in terms of overall housing numbers, so North Dorset can once again have an adequate housing supply in accordance with Government requirements.

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.

Additionally, if Pimperne is to assist in providing housing land to meet Blandford and the District's needs any land that comes forward will provide both market housing and affordable housing in accordance with Local Plan policy. Whilst these affordable dwellings may not go towards meeting needs emanating directly from Pimperne, they will go a long way to helping meet the housing needs of the people of Blandford and potentially elsewhere in North Dorset.

We object to the Neighbourhood Plan's approach to the preclusion of any housing development to the eastern side of the A354 on page 28.

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. Additionally, the A354 runs past Letton Park in the southern part of the Parish. This reference to no development to the east of the A354 potentially excludes the possibility of the development of my clients land east of the A354 and immediately to the south of Letton Park. This land is not in the AONB and could make a valuable contribution to meeting the housing needs of Blandford and the District as a whole.

Given the fact that land to the south of Letton Park is separated from the village by Letton Park itself, impacts on the village itself would be minute. Additionally, there would be little impact on the nearby AONB, as development would be behind existing residential development on the A354 and there is already development the west of the A354 in the form of allotments and other residential development. Any development would be buffered to AONB in the east. Therefore, the visual impact on the AONB landscape would be extremely limited. We are of the opinion that development to the east of the A354 and south of Letton Park could be designed in a sensitive manner to reflect both the local distinctiveness of Pimperne and the existing housing on large plots in Letton Park, 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 not only the likely increase in the housing needs of the Parish, but also the needs of Blandford and North Dorset as a whole. The Neighbourhood Plan presents the ideal opportunity to allocate this additional land and potentially set design criteria so development assimilates with the neighbouring Letton Park and the nearby AONB .

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 provide additional site opportunities that are designed sensitively.

Location for new housing development

The Davis Coats families are disappointed that land to the south of Letton Park has been excluded from the Neighbourhood Plan allocations. It would appear from the Pimperne Neighbourhood Plan Strategic Environmental Assessment – Options Stage Report that the site the site was not even assessed, notwithstanding our representations in October 2016. This lack of consideration is a grave omission in the plan-making process and should be rectified.

The character of Pimperne village has historically seen built form on either side of the A354. Any development on land to the south of Letton Park would be well separated from the existing village core, with Letton Park itself intervening, and would not adversely affect the rural character of the village. A sensitive design solution is achievable on this site and taking the site forward as an allocation in the Neighbourhood Plan would allow design control and would assist in meeting the increased housing needs of the District.

In respect to the A354, transport assessments have already been undertaken which demonstrate that satisfactory highway access can be provided to the land and the County Highway Authority has been consulted.

For the above reasons, we consider that the land to the south of Letton Park should be reconsidered as an allocation in the Neighbourhood Plan prior to its formal submission to the Local Planning Authority for examination.

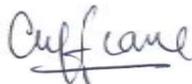
Summary

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.

We object strongly to the land south of Letton Park being included in a gap policy.

Furthermore, we consider that land to the south of Letton Park, Pimperne should be reconsidered for allocation as the issues for its exclusion can be addressed through a sensitively designed proposal. 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 the land south of Letton Park, Pimperne could offer to the Neighbourhood Plan as it progresses further through the process.

Yours sincerely



Cliff Lane
Director