

e-mail: [REDACTED]
Tel: [REDACTED]

Date: 26/03/2019

Blandford+ Neighbourhood Plan

Pimperne Parish Council wish to respond to the Blandford + Neighbourhood Plan 2011-2033 which has been received by North Dorset District Council for submission to examination in accordance with Regulation 16 (b) of the Neighbourhood Planning (General) Regulations 2012 (as amended).

We record that there has been no consultation whatsoever with our neighbours, the Blandford + Neighbourhood Planning Group, therefore there has been no co-operation with the Group and no options discussed.

Our parish is within the Cranborne Chase AONB whose response to the Blandford + Neighbourhood Plan is of the utmost importance.

In general, the Blandford+ Neighbourhood Plan contains in certain areas, policies that have been recycled from those previously submitted and overall, with regard to development adopts a strategic remit as opposed to a local policy. The case for a larger allocation of dwellings to the North and East of Blandford is unsustainable especially since the area to the South East is not contained within the AONB.

With regard to development, the Blandford + Neighbourhood Plan continues with the “landowner led” approach when social and economic requirements should be of the highest importance. Our overview in detail is as follows:

1. Recognition of constraints relevant to Pimperne.

We feel it would be appropriate to include the various planning constraints defined in the Pimperne Neighbourhood Plan on this constraints plan as this map is intended to show constraints in the adjoining area that could be impacted by development, and that the Neighbourhood Plan has been made and would therefore be a material planning consideration. The map should therefore reflect

- The important gap between Blandford and Pimperne
- The safeguarded Employment area at the Taymix/ Yarde Farm location
- The revised settlement boundary (note this includes the allocated sites)
- The LGS designation of the playing fields.

2. Inappropriate references to development within Pimperne Parish.

Despite raising concerns previously, it is disappointing to see that the Blandford Plus Neighbourhood Plan continues to make reference to development potential in Pimperne Parish, which is clearly at odds with the Pimperne Neighbourhood Plan.

Areas A and B on the B+ NP Constraints plan on pg 16 include areas of search within Pimperne Parish whereas it is not within the ability of the Neighbourhood Plan to allocate such land for development. Although it is understood that this may have been based on the Local Plans Review Options paper, it is clear that these are not options for the Neighbourhood Plan and the map should be amended to only show the areas of the search that are wholly within the Neighbourhood Plan area.

Para 5.10 recognises that “the land made available for development in relation to policy B2 extends beyond the town boundary into the neighbouring parish of Pimperne. It will be for the Local Plan review to determine if that land shall be allocated”. The Policy B2 part viii references “no dependency of the land release for the Phase 1 Scheme on the Phase 2 scheme which lies outside the Neighbourhood Plan boundary within the adjacent parish of Pimperne”. It is suggested that as a minimum the reference 5.10 is deleted (as it is not relevant to the Blandford + NP and is considered to be encouraging growth that Pimperne residents would clearly see as contravening their Neighbourhood Plan) and that the criteria xiii is redrafted as follows: “a planning obligation to secure the release of all land necessary for the supporting infrastructure, the 2FE primary school and other community facilities following outline planning consent for the development within the Blandford + Neighbourhood area and prior to the commencement of that scheme” to similar remove any reference to further phases outside of the NP area.

Para 5.25 goes on to state that “the policy acknowledges that part of the housing land north east of the town lies beyond the designated neighbourhood area in Pimperne Parish. The examiner for the recent examination of the Pimperne Neighbourhood Plan which identifies a local gap policy for this land recognised Blandford Forum’s role as a major service centre in the south of the district needing to accommodate growth. The examiner also noted that the land that is within the Pimperne Neighbourhood area could accommodate growth sensitively whilst retaining an important landscape gap between Blandford Forum and Pimperne. It therefore defines that part of the scheme within the Blandford +neighbourhood area as phase 1 and that part beyond the designated boundary as phase 2 and requires that no part of the delivery of phase 1 depends on the delivery of phase 2, while recognising the need for a comprehensive masterplan for the whole of the site”.

Firstly, the reference to the Examiner is misleading as para 5.35 of the Examiner’s report (which states that part of this site is within the Pimperne Neighbourhood Plan area could be accommodated sensitively whilst retaining an important landscape gap between Blandford Forum and Pimperne) is the Examiner’s summary of the objector’s representation. His opinion is clearly expressed in 5.38 where he states that “I consider that the distance quoted in PNP between Pimperne village and Blandford Forum as being less than a mile along the A354 (plan page 4, first paragraph) is a reasonable indication of the relationship between the two settlements, and it is clearly seen by the residents of the parish of Pimperne as having a fragility that needs careful consideration” and in para 5.39 he sets out that this cross-boundary issue is not something that falls within his remit to examine.

Secondly, as referenced above, there should not be reference to development within Pimperne Parish as part of the proposals. It is therefore suggested that the entire second part of this paragraph (from “in addition, the policy acknowledges that part of the housing land north east of the town lies beyond the designated neighbourhood area in Pimperne Parish” onwards) is deleted.

3. Uncertainty over Impacts.

There has been no transport study carried out in terms of whether the highways impact of this level of development can be suitably mitigated. The only information available is based on an EIA scoping report that suggests that the development would fall under the threshold 30% increase(or other sensitive areas affected by traffic exceeds 10%) but this is not backed up by any empirical evidence. The report is suggesting that the following works may be required to facilitate the proposed development:

- New site access roundabout on the A354 Blandford-by-pass.
- New pedestrian links from A354 Blandford-by-pass to Black Lane
- New pedestrian links from Blandford-by-pass to Preetz way.
- Works to the existing A354/ A350 roundabout to increase capacity.
- Improvements to pedestrian facilities at the existing A354/ A350 roundabout and associated approaches.
- Improvements to the existing site access junction on the A354 Salisbury Road.

- Various measures to encourage lower vehicles speeds along the Blandford-by-pass.
 - New pedestrian link to the existing footbridge over the A350 Blandford-by-pass.
- It is notable that the scoping opinion disagrees with a number of issues that were proposed to be 'scoped out' of any EIA, including the need for Water Resources, Drainage and Flood Risk, Cultural Heritage, Air Quality, Noise and Light Pollution (in addition to landscape and biodiversity).

Landscape impact is recognised as a key consideration and Natural England have advised that consideration of such applications should include an assessment of:

- The need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
- The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way.
- Detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

It is clear that the current evidence supporting the NP does not include this level of information.

4. Uncertainty over allotments

"The principle to relocate the existing allotments to accommodate the allocation has already been discussed with the Town Council and negotiations continue with the land interests". Policy B2 V states that "The Lamperd's Field Allotments are relocated to a single location to the west of their current position and comprise land of approximately 2.5 hectares and ancillary facilities that meet or exceed the of the existing site

5. Treatment of alternatives and the SEA

There is a "chicken and egg" reference to school in that the NP argues in 3.16 That DCC 'prefer' the northern option, yet the DCC paper makes clear that the northern option is preferred due to the intended strategy of the NP. It also gauges its assessment on the potential for a further 260 houses in the Pimperne Parish. Furthermore there does not appear to have been consideration of the use of the site in Area J as a potential school site.

Option 1 was put forward on the basis that it would "deliver the full specification" including 2ha of employment land, whereas this is not the case. Option 3 and 4 included employment in Area J as part of a disperse approach, but this dispersed approach was not considered for Area A or B.

The SEA is based on the assessment of reasonable alternatives based on the Issues and Options consultation proposals of the Local Plan Review. At that time Pimperne Parish Council raised concerns about the accuracy of the assessment (<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/north-dorset/local-plan-review/pdfs/issues-and-options-consultation-responses/pimperne-pc-19-1-18-redacted.pdf>) which do not appear to have been addressed.

The table on the attached sheet simplistically assigns a number value to each impact, and assesses the mean average. The SEA proposes that areas, A,B,E,F and J as possibly having some development potential – and the rest discounted. Yet it is clear from the table that site K (which is wholly within Pimperne Parish and therefore not able to be progressed through the Blandford + Neighbourhood Plan) scored more favourably, and sites C and D are not dissimilar in terms of their overall impact compared to F (although no land in area D appears to have been shown as available, and C is also outside of the Neighbourhood Plan area).

Furthermore option E (arguably the most sustainable site) was disregarded on the basis if the likely decrease in the separation (and the potential for coalescence) between the committed land and the village of Charlton Marshall and also the Grade II Littleton House.

On the basis the SEA and approach to consultation appears flawed and shows the difficulty inherent in assessing the most sustainable option for the town's growth when some of the options are discounted due to the administrative boundary dictating the plan area.

Used	Biol	Soil	Water	Air	Clim	Land	Hist	Comm	Hous	Econ	Mean	Logical
A	0	-1	-1	0	0	-2	-1	0	2	0	-0.3	A
B	0	0	-2	0	-2	-2	-1	0	2	0	-0.5	B
C	0	0	-2	0	-2	-2	-2	0	2	0	-0.6	C
D	-1	0	-2	0	-2	-2	-1	0	2	0	-0.6	D
E	0	0	0	0	0	-1	-1	0	2	0	0.0	E
F	-2	0	-1	0	-1	-2	-2	0	2	0	-0.6	F
G	-1	0	-2	0	-2	-2	-2	0	2	0	-0.7	G
H	-2	0	-2	0	-2	-2	-2	0	2	0	-0.8	H
I	-2	0	-2	0	-2	-2	-2	0	2	0	-0.8	I
J	-2	0	-1	0	-1	-2	-1	0	2	0	-0.5	J
K	0	0	0	0	0	-2	-1	0	2	0	-0.1	K