

Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other <i>Please specify:</i>

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	See detailed comments below
Section	
Policy	
Page	
Appendix	

3. Do you wish to? *Please tick one box only.*

<input type="checkbox"/>	Support
<input checked="" type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation

4. Please use the box below to give reasons for your support/objection or make your observation .

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

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 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 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 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 backdrop 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 Government's 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 allocations 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.

5. Please give details of any suggested modifications in the box below.

Continue overleaf if necessary

6. Do you wish to be notified of the District Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

✓	Yes
	No

Signature: _____

Date: 22/06/2018

If submitting the form electronically, no signature is required.

Please use this box to continue your responses to Questions 4 & 5 if necessary