

## NeighbourhoodPlanning

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**From:** Parish Clerk [REDACTED]  
**Sent:** 25 May 2023 16:55  
**To:** NeighbourhoodPlanning  
**Subject:** Pimperne Parish Council Response to Blandford + NP Review  
**Attachments:** PPC Blandford NP+ Reg 16 consultation response 230525.docx

Dear Neighbourhood Planning

Please find attached the response from Pimperne Parish Council to the Blandford + Neighbourhood Plan Review.

I would be grateful if you could confirm receipt of this email.

Kind regards

Jan Fairman  
Pimperne Parish Council



## BLANDFORD + NEIGHBOURHOOD PLAN REVIEW

Regulation 16 Consultation **Friday 14 April 2023 until Friday 26 May 2023**

### Response Form

The proposed modified Blandford + Neighbourhood Plan has been submitted to Dorset Council for examination. The modified neighbourhood plan and supporting documentation can be viewed on Dorset Council's website:

<https://www.dorsetcouncil.gov.uk/blandford-neighbourhood-plan>

**Please return completed forms to:**

Email: [NeighbourhoodPlanning@dorsetcouncil.gov.uk](mailto:NeighbourhoodPlanning@dorsetcouncil.gov.uk)

Post: Community Planning Team, Spatial Planning, Dorset Council, County Hall, Colliton Park, Dorchester, DT1 1XJ

**Deadline: End of Friday 26 May 2023.** Representations received after this date will not be accepted.

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### Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule and privacy policy ([www.dorsetcouncil.gov.uk/privacypolicy](http://www.dorsetcouncil.gov.uk/privacypolicy)). Your data will be destroyed when the plan becomes redundant.

	Personal Details *	Agent's Details *
Title		
First Name	Jan	
Last Name	Fairman	

Job Title(if relevant)	Pimperne Parish Clerk	
Organisation (if relevant)	Pimperne Parish Council	
Address	██████████ ██████████	
Postcode	██████████	
Tel. No.		
Email Address	██	

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.*

## 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 checked="" type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

**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	<input checked="" type="checkbox"/> (see below)
Section	
Policy	
Page	
Appendix	

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

	Support
✓	Object
	Make an observation

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

See combined response to 4&5 below

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

See combined response to 4&5 below

## **DARK-SKY COMPLIANT LIGHTING**

Pimperne Parish Council notes that the modifications to the Blandford+ NP include reference to the CCWWD AONB as an International Dark Sky Reserve (para 2.1), and reference is made to the good practice notes for Dark-Sky compliant lighting on new buildings and refurbishments (5.24). This recognition is supported, subject to any comments made on the details of the requirements by the CCWWD AONB officer.

## **B+ NP CONSTRAINTS PLAN**

Whilst the NP has not looked to modify the B+ NP Constraints Plan, this is considered to contain inconsistencies as it does not recognise the designations in the adjoining area as provided by the Pimperne NP – in particular the Important Gap designations. Yet the list is not limited to constraints wholly within the NP area (as it mentions Fontmell SAC). The map also fails to include heritage assets (Listed and undesignated) on the map

**Proposed changes:**

Amend map to either include the above designations or to acknowledge that the map does not cover all designations relevant for that area.

Add further paragraph (2.13):

“The Pimperne Neighbourhood Plan has designated Important Gaps between the Neighbourhood Plan boundary with Blandford Town and the settlements of Nutford (to the west) and Pimperne (to the north). It also highlights the importance of Letton Park House and the cottages on Whitecliff Mill Hill which are of local historic interest.”

## **POLICY B2 AND SUPPORTING TEXT**

Whilst the NP has not looked to modify Policy B2 or its supporting text, given the updates to national planning guidance since the plan was last examined, the review of the Pimperne Neighbourhood Plan, changes to housing and infrastructure needs and supply locally and also the difficulties in bring forward the site as evidenced

through the pending planning application P/OUT/2020/00026 (which is referenced as a modification to the supporting text), Pimperne Parish Council wish to raise the following concerns and suggested changes to the Examiner:

There is considerable evidence within the outline planning application – which is now subject to consultation on its third revision, having initially been submitted in Autumn 2020, and which remains undecided. The application includes land within the allocated site, and beyond the allocated site within Pimperne Parish. It was originally submitted for “up to 600 dwellings” and has been revised down to “up to 490 dwellings”, which is now subject to further consultation. Clearly it is not possible to provide all of this evidence as part of the NP examination, so the following is suggested as a pragmatic way forward to address key concerns.

<b>Ref</b>	<b>Issue</b>	<b>Comment and proposed change</b>
3.29	States that none of the policies in the Pimperne Plan are of any direct relevance to Blandford	<p>Fails to recognise the Important Local Gap designation (this is particularly relevant in terms of the later discussion on phasing).</p> <p><b>Proposed changes:</b></p> <p>Delete final sentence (or repeat suggested paragraph 2.13 here, adding cross-references to policies LC and LDC).</p>
5.10	Refers to being Dorset Council’s role to look at allocating sites in the parish of Pimperne	<p>Fails to recognise the role of the Pimperne Neighbourhood Plan in this respect, and that Pimperne Parish Council chose not to allocate any land, but instead to include this area (within Pimperne Parish) within the Important Local Gap designation.</p> <p><b>Proposed changes:</b></p> <p>Delete final sentence of 5.10</p>
B2(i) 5.20 (3.20)	Refers to approximately 400 homes	<p>The latest evidence provided by the pending planning application is that the area within the proposed allocation would accommodate in the region of 350 homes – this is significantly lower than the volume of houses suggested in Policy B2, and has been amended downwards twice in response to objections to the development (and a final number has yet to be agreed and may be lower still). The plan should be amended to at least reflect this latest capacity estimate, and acknowledge that there may need to be further reductions based on the environmental constraints (see further points below on noise, groundwater flooding / contamination and AONB impacts).</p> <p>There has been no update to the consideration of housing supply requirements (and it remains unclear how the 1,057 dwelling figure in para 3.20 was arrived</p>

<b>Ref</b>	<b>Issue</b>	<b>Comment and proposed change</b>
		<p>at and whether this should also be reduced by at least 50 dwellings).</p> <p><b>Proposed changes:</b></p> <p>Amend references to ‘about 350 dwellings (subject to addressing the relevant constraints)’</p> <p>Ensure housing target references are updated accordingly and continue to evidence whether the justification of public benefits is still appropriate.</p>
<p>B2(viii) 3.22 5.16 5.23</p>	<p>Acknowledges the importance of deliverability of the infrastructure as part of the justification for the harm to the AONB</p> <p>Refers to the impact on the AONB</p>	<p>The provision of a new school was considered critical in 2019. Four years have now lapsed and there has been no update to the school role forecasts to provide the public benefits remain to justify the harm to the AONB and its setting, and no published comments on the application by the education department of Dorset Council.</p> <p>The supporting text and policy should include reference to the AONB’s setting (for clarity) in line with the NPPF. The reference to the NPPF (in paragraph 5.16) has not been updated to the 2021 version.</p> <p>Para 5.23 (part of the justification) is neither clear nor evidenced – it is assumed that this is in relation to the Lidl application which lies within the bypass and is therefore not comparable.</p> <p><b>Proposed changes:</b></p> <p>Ensure forecasting / pupil placement statement has been updated in order to evidence whether the justification of public benefits is still appropriate.</p> <p>In the absence of an updated pupil placement statement, amend 5.16 to read “significant public benefits will need to be demonstrated to justify the incursion of a major development into the AONB in accordance with paragraph 176 of the NPPF, which places great weight on conserving the landscape and scenic beauty of such designated landscapes.”</p> <p>To reflect NPPF, the following also should be added to 5.16 “Furthermore, national policy is clear that the development within the setting of the AONB will need to be sensitively located and designed to avoid or minimise adverse impacts on the designated area...”</p> <p>Delete 5.23</p> <p>Amend criteria viii of Policy B2 to align with the requirements in paragraphs 176 and 177, e.g. by adding: “The application will need to demonstrate the</p>

<b>Ref</b>	<b>Issue</b>	<b>Comment and proposed change</b>
		exceptional circumstances and need for major development within the AONB in line with national policy, and how the design avoids or minimises adverse impacts on the designated areas...”
B2(viii)	Refers to the impact on Langbourne House as a designated heritage asset	Should also include reference to Letton Park House which is referenced in the Pimperne NP (paragraph 65) as a locally important building (undesigned heritage asset) and shown on Map 5. <b>Proposed changes:</b> Insert “and Letton Park House (undesigned heritage asset)” after Langbourne House in (viii)
B2(x)	Does not include groundwater flooding and contamination risks	This section should include reference to groundwater flood risk (at its eastern end – historic groundwater flooding is shown on <a href="#">Dorset Explorer</a> ) and contamination (as the site lies within the groundwater Inner Protection Zone – see <a href="https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs">https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs</a> and Magic Map) <b>Proposed changes:</b> Amend (x) to read “Supporting evidence must be submitted to demonstrate how the scheme will not increase groundwater, surface water or fluvial flood risk or increase risk of groundwater pollution.” Add further information in the supporting text regarding the environmental constraints relating to groundwater and its importance for drinking water locally.
B2(xii)	Design features to improve energy efficiency and reduces carbon dioxide emissions	This requirement is not clear - is it intended to be in comparison to the current land use as a greenfield site? <b>Proposed changes:</b> Amend to be more precise / clear
B2(xiii) 5.25	Refers to Phase 1 Paragraph 5.25 specifically states that part of the housing land north-east of the town lies beyond the designated neighbourhood area (in Pimperne Parish). However	The Policy is not clear what Phase 1 is – whether it is a phase within the allocated site (in which case, is this simply the first phase or a specific site in order to ensure the delivery of critical infrastructure?) or whether it is intended to give some credence to further phases within Pimperne parish (in which case this appears to be going beyond the brief of the Neighbourhood Plan’s remit – and appears to be the case by what is stated in para 5.25).

<b>Ref</b>	<b>Issue</b>	<b>Comment and proposed change</b>
	there is no policy in place to facilitate this additional housing and it is contrary to the Pimperne NP.	<p>The footnote (3) does not particularly clarify matters and it is unclear how this would be applied in determining any application.</p> <p><b>Proposed changes:</b></p> <p>Amend B2(xiii) and to read “a planning obligation to secure the release of all land necessary for the supporting infrastructure, the 2FE primary school and other community facilities following planning consent for the first phase of the scheme, and prior to the commencement of the development” and delete footnote 3</p> <p>Amend 5.25 to read</p> <p>“...In addition, the site allocation is limited to the area within the designated Blandford+ Neighbourhood Plan area and does not extend into Pimperne parish. As such, the planning obligation will relate solely to the allocation made in this plan.”</p>
B2 (general)	There is no reference to the consideration of noise from the bypass within the policy or supporting text.	<p>Road traffic noise levels will impact on a significant area of the site – as shown by <a href="http://www.extrium.co.uk/noiseviewer.html">http://www.extrium.co.uk/noiseviewer.html</a>. This monitoring data, and that provided by the applicant’s own noise assessment, shows that noise from the bypass would impact on the properties closest to that road and potentially much further into the site. The level of noise likely to be experienced fall within the ‘high noise level’ categories which, according to Government guidance, should normally be avoided unless suitable mitigation can be made.</p> <p><b>Proposed changes:</b></p> <p>Add further criteria to read “Supporting evidence must be submitted to demonstrate how noise from traffic on the bypass can be adequately mitigated so as to avoid significant adverse impacts on future occupants.”</p> <p>Add further information in the supporting text regarding the noise levels and guidelines.</p>

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

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Signature:   
*If submitting the form electronically, no signature is required.*

Date: 25/05/23