

INDEPENDENT EXAMINATION OF THE WIMBORNE ST GILES

NEIGHBOURHOOD DEVELOPMENT PLAN 2021-2036

EXAMINER: Andrew Mead BSc (Hons) MRTPI MIQ

Sarah Forwood
Clerk to Knowlton Parish Council

Nick Cardnell
Senior Planning Policy Officer
Dorset Council

Examination Ref: 01/AM/WNP

30 September 2024

Dear Ms Forwood and Mr Cardnell

Following the submission of the Wimborne St Giles Neighbourhood Development Plan (the Plan/ WSGNP) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for Knowlton Parish Council (the Parish Council/KPC) and Dorset Council (DC), to which I would like to receive a written response(s) by **Monday 14 October 2024** if possible.

1. Examination Documentation

I can confirm that I am satisfied that I have received the draft Plan and accompanying documentation, including the Basic Conditions Statement; the Consultation Statement; the SEA Environmental Report; the Habitats Regulations Assessment Report; and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the Plan, I have not at this initial stage identified any very significant and obvious flaws in it that might lead me to advise that the examination should not proceed.

2. Site Visit

I will aim to carry out a site visit to the neighbourhood plan area during the *week* beginning 30 September 2024. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from Dorset Council and the Parish Council.

I have 5 principal areas of questioning seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) by **Monday 14 October 2024**.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within around 6 weeks of submission of the draft Plan. However, as I have raised a number of relatively detailed questions (with requested actions), I must provide you with sufficient opportunity to reply. Consequentially, the examination timetable may be extended. Please be assured that I will aim to mitigate any delay as far as is practicable. The IPE office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Parish Council and Dorset Council websites.

Thank you in advance for your assistance.

Yours sincerely

Andy Mead

Examiner

ANNEX

From my initial reading of the Wimborne St Giles Neighbourhood Development Plan 2021-2036 (Submission Draft dated April 2024), the supporting evidence and the representations that have been made to the Plan, I have the following questions for Knowlton Parish Council (the Parish Council/KPC) and Dorset Council (DC). I have requested the submission of responses **by Monday 14 October 2024**, although an earlier response would be much appreciated. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

Questions to Knowlton Parish Council and Dorset Council

Specific questions of clarification to each Council are listed below, but I would be happy to have comments from either Council about any of the questions asked and from KPC about any issues raised by DC in the Regulation 16 representations not considered below.

1. Date of submission to DC

- a. **Question to DC.** Please could the date of the submission of the Wimborne St Giles Neighbourhood Plan (WSGNP) to DC be confirmed?

2. Titles

- a. **Question to KPC.** Paragraph 1.3 of the Plan refers to Wimborne St Giles Parish as being within the group of parishes overseen by Knowlton Parish Council. Is the correct name for “Edmondsham Parish”, “Cranborne and Edmondsham Parish”?
- b. **Question to DC.** The Plan refers to the Cranborne Chase National Landscape. Is the correct name Cranborne Chase and West Wiltshire Downs National Landscape, or has the title been altered during the “rebranding” from its previous Areas of Outstanding Natural Beauty (AONB) nomenclature?

3. Habitats Regulations Assessment (HRA)

- a. **Question to KPC and DC.** The Basic Conditions Statement (BCS, page 18) refers to paragraphs 6.4, 6.6, 6.9 and 6.11 of the HRA and the recommendations therein on the issue of possible net new housing and windfall planning permissions for residential development in the Plan area. Furthermore, it identifies the need for mitigation against potential subsequent recreational pressure caused to nearby designated European sites.

Given that the issue would arise for many other locations and windfall development could be proposed anywhere in Dorset, not just within the area of this particular Plan, should the recommendations in the HRA be more appropriately considered strategically in the Dorset Local Plan?

- b. **Question to KPC and DC.** If the recommendations are taken forward in the WSGNP, the BCS and HRA refer variously and, it seems to me, inconsistently, to the New Forest Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar. Are these terms or locations being used in the Plan synonymously? Map A.1 in Appendix A of the HRA indicates different boundaries in certain areas. However, so far as the Plan examination is concerned, were I to recommend modifications to Policy 9 or 12, how should I refer to the New Forest group of European/International sites?

- c. **Question to KPC and DC.** Map 1.A in Appendix 1 shows the boundary of the New Forest SAC/SPA/Ramsar. Given the irregularity of the boundary, what is the justification for consultation within such a precise area as defined by 13.8km?
- d. **Question to KPC.** Please could I be supplied with a map of the Plan area on which the boundaries of 13.8km (or adjusted in answer to Q3c above) from the New Forest group of European/International sites and 5km from the Dorset Heathlands group of European/International sites are superimposed and which, if recommended as a modification to the Plan and subsequently incorporated into the made Plan, would then be suitable for the purposes of the development management process?
- e. **Question to KPC.** Please may I have copy of the consultation response from Natural England about the latest version of the HRA?
- f. **Question to KPC.** The following policy modifications (to Policy 9 or Policy 12) are suggested by DC in the Regulation 16 representations:

“Site developers should be aware that net new windfall housing within the 5 km catchment of Dorset Heaths SAC/Dorset Heathlands SPA will require a separate report to inform HRA, for submission to the local planning authority In line with the Dorset Heathlands Planning Framework 2020- 2025: Supplementary Planning Document. Depending on the details, mitigation for recreational pressure impacts may also be required”.

“Site developers should be aware that net new housing (including windfall) within the 13.8km catchment of New Forest SAC/SPA will require a separate report to inform HRA, for submission to the local planning authority. Depending on the details, mitigation for recreational pressure impacts may also be required in line with the emerging New Forest Mitigation Strategy”.

Please may I have any comments from KPC?

4. Policy 2

- a. **Question to KPC and DC.** Policy 2 begins with the phrase: “In general, buildings should ...”, which I consider is too ambiguous for effective development management. Therefore, I suggest that the phrase is substituted by : “Unless otherwise justified, buildings should ...“. Do the Councils have any comments?

5. Residential allocations

- a. **Q to KPC.** The Table at paragraph 7.1 lists the location of potential sites with the appropriate Neighbourhood Plan Policy number. For example, the table shows the location “Continuation of Coach Road” as Policy 18. However, the text (page 43) shows it as Policy 21. There are other anomalies. Please could a corrected table be submitted?
- b. **Q to KPC.** The Regulation 16 representations from DC highlight reservations concerning Policy 15 (allocation for two dwellings on land east of Bottlebush Lane). Does the KPC have any response?

- c. **Q to KPC.** The Regulation 16 representations from DC raise concerns in relation to the detail of Policy 17 (allocation on land adjoining the Playing Fields) and suggest that the indicative drawings are omitted from the Plan. Does the KPC have any comments?
