# Wimborne St Giles Neighbourhood Plan - Submission Plan Representation Summary

Knowlton Parish Council submitted the final version of the Wimborne St Giles Neighbourhood Plan (2024) to Dorset Council for independent examination in May 2024. The supporting Habitats Regulation Assessment (HRA) was subsequently updated in July 2024 to reference potential impacts upon the Dorset Heathlands SPA / Ramsar and SAC and New Forest SPA / Ramsar and SAC. People were given six weeks from 12 August 2024 until the end of Tuesday 24 September 2024 to comment on the content of the plan or how it was produced. At the close of the public consultation eight representations were received.

Rep ID	Respondent	Summary
1	Avison Young on behalf of National Grid Electricity Transmission	Introduction  National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.  National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.  Allocations  An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.
2	Cranborne Chase & West Wiltshire Downs National Landscape	Neighbourhood Area  Whilst welcoming the attention to National Landscape matters in the NP, the Partnership is, as previously stated, disappointed that the neighbourhood planning opportunity has not been extended to the whole of the parish areas.  Paragraph 2.9  Although the style of NPs tends to be rather more relaxed than Local Plans they are, nevertheless, important elements of the Development Plan. The reference in 2.9 to AONBs and development should, therefore, more precisely echo the wording of NPPF 182, 'The scale and extent of development within all of these designated areas [AONBs & NParks] should be limited'.  Paragraph 2.11  In terms of accuracy in 2.11, the CCAONB Landscape Character Assessment 2003 was undertaken before the East Dorset one in 2008 and therefore the CCAONB one is not 'subsequent'.

#### Paragraph 3.4

Para 3.4 the Registered Park and Garden status is usually for the design, layout, and content related to designers and historic periods in the creation of such parks rather than the ownership of it by a particular family, so that seems to need a 'tweak' to get the balance right.

#### Paragraph 5.2

P10, 5.2, the link to the parish web site and character assessments does not work.

#### Paragraph 5.24

The section on heat pumps, 5.24, seems quite extensive for a NP, but crucially it does not mention that heat pumps rely on electricity to fuel them. Furthermore, until renewable sources of electricity are readily available it seems that electricity will remain an expensive fuel.

#### Policy 10. Watermeadows and other important Green Spaces & Paragraph 5.42

The character of the core of the village is a key feature. However, terminology does have to be precise and I would strongly advise that the term 'water meadows' is checked for accuracy. I say that as the descriptive text relates more to flood plain meadows. As you may know, water meadows are heavily engineered structures that are actively flooded and then speedily drained via manual hatches and sluices. The process involved using the flood water to warm the fields at the end of winter [and protect them from frosts] so that, when quickly drained, the warmer fields would produce a flush of early grass for the farm's grazing animals. Flood plain meadows are simple meadows that occasionally flood when river flows are high but the water onto the fields is not controlled by hatches, sluices, and feeder / drainer channels. This applies to 5.42 and Policy 10.

# Policy 11. Dark skies and external lighting

Policy 11, dark skies and external lighting, please remove 'if possible' from the second sentence.

# Policy 13. Employment opportunities

Policy 13 seems slightly relaxed in relation to the criterion on lighting requirements; they must, in this IDSR, meet IDSR criteria.

# Illustrations, p39 & p40

P39 & p40 have illustrations showing roof lights, which can be problematic. Earlier in the NP the light pollution capacity of roof lights has been identified so it can be confusing to include illustrations with roof lights as that could give an indication that roof lights are acceptable in this IDSR.

# Map 7. Other sites towards Monkton Up Wimborne WSG008, WSG009 and WSG014

The Outliers Map7 shows development sites that are at more than easy walking distance from the core of the village. The inclusion of those sites contradicts the argument being put forward that development should reinforce and support the village and its life.

	Section 85 of the Countryside and Rights of Way Act 2000 has been amended by Section 245 of the Levelling-up and Regeneration Act 2023
	Whilst I appreciate that the NP has been progressing prior to the amendment to s.85(A1) of CRoW Act 2000 that did come into force at the end of 2023. That duty is a considerable enhancement on the previous s.85 duty and it applies to Parish and County Councillors as well as many other 'relevant authorities'. It is important that those making and using the NP understand the implications of that statutory change, and the need to demonstrate how decisions further the purposes of AONB designation, namely conserving and enhancing natural beauty. <a href="https://cc-nl.section85/4ppA5Leaflet-2024-FINAL.pdf">CC-NL Section85/4ppA5Leaflet-2024-FINAL.pdf</a> (cranbornechase.org.uk)
Dorset	Plan Period
Council – Spatial Planning	The front cover confirms that the Plan period will cover the years 2021 – 2036, a fifteen-year time horizon or eleven years from anticipated making of the plan.
	Neighbourhood Area
	Dorset Council supports section 1.1 and Map 1 (also submitted separately) which discusses and depicts the Neighbourhood Plan area, a requirement for submission.
	For the examiner's benefit, it should be noted that the area does not coincide fully with the civil parish boundary of Wimborne St Giles as the plan area includes a small portion of land lying within the parishes of Gussage All Saints, Woodlands and Edmondsham.
	The Planning Context
	The National Planning Policy Framework (December 2023) is a material consideration.
	Consideration should be given to the current and anticipated settlement strategy set out in the Adopted Christchurch and East Dorset Core Strategy (April 2014), saved policies from the previously adopted 2002 Local Plan and emerging Dorset Council Local Plan (2021). The East Dorset Local Plan Options Consultation (July 2018) is also considered.
	Wimborne St Giles is located within the Cranborne Chase and West Wiltshire Downs National Landscape (previously AONB). Wimborne St Giles is a Grade II* Registered Park and Garden, and the village has a conservation area with many listed buildings.
	Design Guidance and Codes
	It is understood that the seven character areas and following Polices 1-11 within the Plan have drawn extensively from the 'Wimborne St Giles Design Guidance and Codes' (August 2022) prepared by AECOM.
	Policies 1-9
	The Council's Planning Policy Team advise: Suitable approaches, no concerns raised.
	The Councils Planning Applications Validation Checklist (1 October 2022, updated April 2024), Christchurch and East Dorset Core Strategy (2014) and National Policy (December 2023) are quoted in support of these views.
	Spatial

#### Policy 1 Physical and visual connections

The Council' Definitive Maps Team add that the Policy refers to cyclists and pedestrians but does not mention horseriders.

#### Policy 10. The Watermeadows and other important Green Spaces

The River Allen is a Priority Habitat, the Watermeadows aligns with the river flood plain and the area is special to the local community. We have no concerns with the proposed approach.

The six proposed local green spaces are all close to the community they serve, are demonstratable special and are not extensive tracts of land.

The four objectives required to improve and expand the public rights of way network are supported.

The Council's Definitive Maps Team add "with regards to Policy 10; Permissive paths would complement the existing public rights of way network, but since permission can be withdrawn at any time they would not improve or expand the network. I would suggest dedication of new public rights of way where possible."

### Policy 11. Dark skies and external lighting

The Cranborne Chase and West Wiltshire Downs is an International Dark Skies Reserve (IDSR) and the AONB Management Plan has seven policies related to Dark Night Skies

Policy 11 reflects National Policy, the AONB Management Plan and emerging local planning policy.

### Policy 11b. Features of local historic importance

The Council's Conservation Officer advises:

The plan benefits from a heritage-specific policy 11b which makes reference to a provisional list of non-designated heritage assets. However, heritage considerations have been spread over several policies in a piecemeal fashion.

Appendix B includes a provisional list of non-designated heritage assets. During site visit the Telephone box fronting Bottlebush lane was also considered a potential heritage asset.

# **Housing Requirement**

The emerging Dorset Council Local Plan set out a proposed housing requirement methodology in the supporting text of policy DEV9 and within Appendix 2 however at the time of publication no figure was generated for Wimborne St Giles, which was designated sometime after.

Nevertheless, the proposed housing requirement under this methodology is the sum of completions since the beginning of the Plan period, extant planning permissions, adopted housing allocations, capacity on major sites (of 10 or more dwellings) within development boundaries as evidenced in the SHLAA and a windfall allowance on minor sites (of less than 10 dwellings) and can be calculated retrospectively.

The Neighbourhood Housing Requirement figure for Wimborne St Giles is 20 and made up of 4 existing commitments (April 2020) and a windfall of 16 dwellings on minor sites projected forward to 2038 (1.16 dwellings a year).

The Neighbourhood Plan group has, however, undertaken additional research into the needs of their community.

#### Overall Housing Supply and cumulative impact

Having raised concerns at the earlier regulation 14 stage we are now content this submission draft Neighbourhood Plan has considered the spatial strategy for the area outlined within the Planning Context chapter above including the national landscape (AONB), heritage and sustainable transport constraints in the area. Outside of the village, national policy seeks to avoid "isolated homes in the countryside" subject to five exceptions and these have been used to assess the suitability of the more rural housing sites.

### Policy 12. Location and Types of New Housing

The proposed mix of dwelling types seems appropriate and the cross reference to the Dorset Housing Allocations Policy is welcomed. We do however have a concern that the proposed phasing of development is overly prescriptive for such a small number of units given the national and local shortage of housing stock.

The Cranborne Chase and West Wiltshire Downs National Landscape (AONB) is a designated rural area and the collection of obligations on sites of 5 or more dwellings is supported.

### Policy 13. Employment opportunities

We consider Policy 13 is in general conformity with Policy PC4 and can be supported.

The Council's Transport Planning Team advise: The suggested additional wording, detailed below, would help ensure that thought is given to pedestrians and cyclists in new development proposals and a safe environment is created for all users. Bullet point 2 "the site can be safely accessed for all users, including pedestrians and cyclists,.."

### Policy 14. Valued Community Facilities

The Council's Planning Policy Team advise: The retention of community facilities is supported and the support for new facilities or existing facilities to modernise and adapt also reflects national policy and local policy LN7.

It is suggested that the three projects listed are moved from the policy text and to a separate projects section, like Project 3.

# Renewable Energy

At this stage, no policy is proposed but should a scheme emerge, it should have regard to national policy and be in general conformity with strategic local policies.

# Site Assessment Criteria

The Christchurch and East Dorset Core Strategy, Policy KS2 Settlement Hierarchy sets out "the location, scale and distribution of development should conform with the settlement hierarchy, which will also help to inform service providers about the provision of infrastructure, services and facilities." Wimborne St Giles is identified as a 'Village' which are "Settlements where only very limited development will be allowed that supports the role of the settlement as a provider of services to its home community."

The Planning Policy Team refer to NPPF (Dec 2023) paragraphs 82-83 to assess the suitability of rural sites and paragraph 84,

where exceptional circumstances might apply.

The Councils Conservation Team have also been a significant consultee in the development of this Plan and have made comments on earlier drafts of the Plan and on all the proposed site allocations (Appendices 1- 3 of this response). These comments remain relevant.

### Policy 15. Land east of Bottlebush Lane (White Cottages) (WSG001)

The Council's Planning Policy Team advise: Although some reference is given to the historic pattern of development along the river corridor and similar pairs of estate cottages, we are concerned that new development on this site is located some distance from the centre of Wimborne St Giles and could be considered an isolated dwelling. Nor has there been any justification under NPPF (Dec 2023), Paragraph 84.

### Policy 16. Plot in front of the Terrace, adjoining No. 13 (WSG003)

The Council's Planning Policy Team advise: This policy fulfils, NPPF (Dec 2023), paragraph 83 requirement to be located where it will enhance or maintain the vitality of rural communities.

### Policy 17. Land adjoining the Playing Fields, opposite Park Lane (WSG006)

The Council's Planning Policy Team advise: This policy fulfils, NPPF (2021), paragraph 79 requirement to be located where it will enhance or maintain the vitality of rural communities.

### Heritage (WSG006)

At the regulation 14 consultation stage the Conservation Officer had concerns (Appendix 3) that "Development of this site has the potential to cause harm to the setting of listed buildings in the village and St Giles House and grounds and the elevated nature of the site has the potential to impact on views into and out from the conservation area and historic parkland."

In response, an indicative sketch was circulated to the Conservation Officer in December 2023 who replied in January 2024 (Appendix 2) to indicate:

A much-improved scheme. As follows:

- 1. A much-reduced scheme. Number of units reduced from 22 to 10 which responds to locality and scale of development in the area
- 2. Development focused in part of the field retaining more open space on the boundary of the village
- 3. Buildings positioned around a central courtyard to reflect farmstead arrangements in the area
- 4. Varity of built form and size of footprint to suggest hierarchy of building and variety of functionality as would be the case with a farmstead

Paragraph 7.16 of the submitted Neighbourhood Plan explains:

"Following on from discussions with the Conservation Team at Dorset Council, the decision was taken to reduce the site area to the western part of the paddock. The eastern edge as now indicated aligns with the rear gardens of properties on Park

Lane opposite, showing the furthest extent where residential development (including gardens) may be considered, but the site area may be further reduced as a result of further design work and testing through a planning application. A layout based on a typical farmstead (around a central courtyard) was considered to be a possible approach that could be taken on this edge-of-village location. An indicative sketch of this is shown"

The Council's Conservation Officer (Appendix 1) has updated their advice:

An indicative layout and artist's impression of the new development at the land for the site adj to the playing fields (WSG006) has been submitted as part of the Plan. Generally, the purpose of a neighbourhood plan is to establish a brief for development density, building heights, footprint and quantum to ensure development will avoid harm to heritage assets. Devising and applying design and layout is usually undertaken as part of the planning process.

It remains the case that a degree of sensitive development can be supported in principle on this site close to the village core. However, the formal layout of the site, variety of building designs and sizes in one development and addition of domestic features such as large chimneys, picture windows and rooflights appears somewhat confused and unlike the established pattern and purpose of development in the village. The placement of buildings on site with larger buildings located at right angles to the street may impact on views of the setting of heritage assets and wider landscape views of the settlement which would appear to contradict polices 1,2 & 4 presented in the document.

If this layout and building design were submitted as part of the application process to develop the site, it is likely the proposals would not be viewed favourable by the Council. The inclusion of the 3 images in the document is misleading. It is recommended that both artists impressions and indicate layout are removed from the document.

The neighbourhood plan does identify and promote local character and distinctiveness. On balance however, it is not likely that the proposed design and layout of site WSG006 as shown in indicative drawings would sustain the village character and be supported by the Council if an application was submitted and it is suggested the drawings are omitted from the approved Neighbourhood Plan.

# Policy 18. Barn at Glebe Farm (WSG007)

The Council's Planning Policy Team advise: The barns are no longer suited to agricultural use and the Conservation Team agree that their conversion to residential accommodation or work / studio space would help to conserve and enhance their character. This policy is considered to fulfil NPPF (Dec 2023), Paragraph 84 criterion C).

# Policy 19. Infill plot on Park Lane (WSG005)

The Council's Planning Policy Team advise: This policy fulfils, NPPF (Dec 2023), paragraph 83 requirement to be located where it will enhance or maintain the vitality of rural communities.

# Policy 20. Infill plot on Baileys Hill (WSG004)

The Council's Planning Policy Team advise: This policy fulfils, NPPF (Dec 2023), paragraph 83 requirement to be located where it will enhance or maintain the vitality of rural communities.

#### Policy 21. Land off Coach Road (WSG002)

The Council's Planning Policy Team advise: This policy fulfils, NPPF (Dec 2023), paragraph 83 requirement to be located where it will enhance or maintain the vitality of rural communities.

### Policy 22. Land at North Barn (WSG008)

The Council's Planning Policy Team advise: This policy is considered to fulfil NPPF (Dec 2023), Paragraph 84 criterion C).

### Policy 23. Framptons (WSG014)

The Council's Planning Policy Team advise: It is noted that the agricultural barns are no longer suited for agricultural purposes and that the Conservation team agree that their re-use would conserve and enhance their character. This policy could be considered to fulfil NPPF, Paragraph 84 criterion C).

### Policy 24. Former chicken sheds, Monkton Up Wimborne (WSG009)

The Council's Planning Policy Team advise: It is noted that the existing chicken sheds are no longer suited for agricultural purposes and that the Conservation team agree, that their demolition would enhance the setting of the listed buildings from the lane and the landscape. This policy could be considered to fulfil NPPF (Dec 2023), Paragraph 84 criterion C).

### **Habitats Regulation Assessment (HRA)**

The Council's Senior Environmental Assessment Officer advises:

The 'Report to Inform Habitats Regulations Assessment' April 2024, Updated July 2024 has been produced by AECOM on behalf of the NP group and can be supported.

We note that no policy mitigation is required in respect of Water Quality, Level and Flow but that additional wording is still required in response to the Neighbourhood Plan Area's proximity to the Dorset Heathlands SPA / Ramsar and SAC and New Forest SPA / Ramsar and SAC.

We would like to highlight to the Examiner that we will be unable to adopt the Neighbourhood Plan without the addition of the proposed wording (or wording to the same effect) to the Plan and respectfully request that the following mitigation set out in the sections below is included as suggested modifications to the Plan.

# Dorset Heathlands SPA / Ramsar and SAC

In respect of the Dorset Heathlands SPA / Ramsar and SAC the report acknowledges that it is possible that windfall sites may come forward for consideration during the lifetime of the WSGNP.

To address this, it is recommended (HRA, paragraphs 6.4 and 6.6) that additional wording, accompanied by a map of the catchment, is added to Policy 9 or Policy 12 of the WSGNP to state that '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'.

#### New Forest SPA / Ramsar and SAC

In respect of the New Forest SPA / Ramsar and SAC the report acknowledges that it is possible that windfall sites may come forward for consideration during the lifetime of the WSGNP.

It is therefore recommended (HRA, paragraphs 6.9 and 6.11) that additional wording, accompanied by a map of the catchment, is added to Policy 9 or Policy 12 of the WSGNP to inform developers that '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.

### Strategic Environmental Assessment (SEA)

The Council's Senior Environmental Assessment Officer advises:

I reviewed the SEA which has been submitted for the Reg 16 consultation of the Wimborne St Giles NP.

The scope of my review of the SEA was to check whether it meets the statutory requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment ('SEA Directive'), which is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 ('SEA Regulations'). The Basic Conditions require conformity with this legislation, since there is a requirement that the making of the plan "does not breach, and is otherwise compatible with, EU obligations".

As you know, a key area of legal challenge for SEA is the consideration of alternatives. In my opinion, the SEA has considered reasonable alternatives well, since it has provided justification for the identification of the reasonable alternatives, assessed the impacts of the reasonable alternatives, and provided an account of the preferred option chosen (see Chapter 4).

I reviewed a previous version of the SEA back in March 2023 and noted that the SEA concludes that there is still some uncertainty in relation to the effects upon the historic environment. The sites proposed include sensitive heritage sites, such as the conversion of historic barns, and I recommended that the SEA considers these effects in more detail as site proposals emerge to ensure that the potential for effects upon the historic environment are addressed iteratively and fully. The SEA has added to the previous assessment to consider the historic effects in more detail (see section 5.21 to 5.25), and I'm satisfied that the historic effects have been fully considered. However, I would have regard to the comments of Historic England, as the experts in this field, to ensure that the assessment of effects upon historic assets is adequate.

Overall, I'm satisfied that the SEA meets the statutory requirements of the SEA Directive and Legislation, and therefore the basic condition has been met in this regard.

### **Appendices**

- Appendix 1: Conservation response (September 2024) to the submission draft Wimborne St Giles Neighbourhood Plan (April 2024)
- Appendix 2: Conservation response (January 2024) to updated sketches for site WSG006 supplied (December 2023)
- Appendix 3: Conservation response (March 2023) to the Pre-submission draft Wimborne St Giles Neighbourhood

		Plan (February 2023)
4	Environment Agency	Having commented previously on this plan we are pleased to see that our previous comments have been taken on board. We therefore have no further detailed comments to make in relation to this plan.
5	Gary Cox	Appendix B: Unlisted Historic Buildings
		Request to update description of property to read.
		Watercress Cottage, All Hallows - A single brick and tile cottage dating from at least the 17th century with 19th & 20th century additions, sited close to the highway and featuring a symmetric front with small casements and open porch.
6	Historic England	<u>Heritage</u>
		In our response to the previous Regulation 14 consultation we drew attention to the need for a greater demonstration within the supporting evidence of how relevant heritage considerations had been taken account of and used to inform the composition and suitability of policies proposing site allocations (see attached). We also recommended that the community liaise with your authority's heritage team to best ensure that demonstration.
		We note from the Consultation Statement supporting the submitted Plan that following feedback on the Regulation 14 consultation there has been liaison with your authority's heritage team and that policies, including site allocations, have been deleted or modified accordingly. We are pleased that such liaison has taken place, and are happy to defer to your authority's heritage team in its confirmation of the suitability of what has now been submitted relative to relevant historic environment considerations.
7	National Highways	Introduction
,		National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A31 trunk road which passes approximately 12km to the south of Plan area. The local highway network provides a number of potential connections to the A31 including the B3078 via Wimborne and the B3081 via Verwood. It is acknowledged that many of the SRN junctions along the A31 corridor experience congestion during peak periods.
		Having reviewed the plan's proposed policies, we consider that these are unlikely to lead to a scale of development that would adversely impact on the safe and efficient operation of the SRN, in accordance with policy contained within DfT Circular 01/2012 The strategic road network and the delivery of sustainable development and the NPPF. We therefore have no specific comments to offer on the policies within the plan.
8	Natural England	Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan