

Yetminster & Ryme Intrinsic Neighbourhood Plan – Dorset Council Comments

Introduction

This document sets out the Dorset Council comments on the Yetminster & Ryme Intrinsic Neighbourhood Plan submission Consultation Draft (Regulation 16 – July 2021).

This response considers the extent to which the Plan complies with National Policy and Guidance (primarily the National Planning Policy Framework 2021) and is in general conformity with the strategic policies of the development plan for the area (the adopted Joint West Dorset, Weymouth and Portland Local Plan). The neighbourhood plan should also contribute to sustainable development and be compatible with EU obligations including the SEA Directive of 2001/42/EC.

Comments made by Dorset Council’s Infrastructure Service at Regulation 14 stage relating to the accessibility of the proposed housing sites (Policies H4, H5, H7 & H8) have been repeated in this consultation response as they are considered to remain relevant.

Dorset Council has actively engaged with Yetminster & Ryme Intrinsic Parish Council throughout the preparation of the Neighbourhood Plan. This engagement has helped to shape the Plan and as such this representation mainly contains commentary on the Plan where Dorset Council considers issues remain but is supportive of approaches where appropriate.

Community Planning Team – Comments

Plan Period

Dorset Council supports the proposed Plan period 2017 – 2036 which offers a 15-year time horizon (as of 2021).

General

Map 3 Defined Development Boundary & Site Allocations – The map resolution is supported, however, it is recommended that additional policy labels are applied to each of the site allocations.

Map 4 Green Spaces and Community Facilities – The scale and clarity of map 3 is supported, however, it is suggested that the difference between the Green Spaces designations (Important open gaps, Local Green Spaces and Land of local landscape Importance) could be further emphasised through a change to the colour pallet or hatching width. At first glance the hatching looks very similar, making it difficult to establish which policy applies in each location.

Policy EN1: Building Conservation

Dorset Council is supportive of this conservation policy which is considered to be in general conformity with Policy ENV4 of the adopted local plan. The cross references to Table 1

Yetminster Conservation Area – Special Interest and Table 2 Locally Important (unlisted) Buildings and Heritage Features are considered helpful.

Policy EN2: Local Landscape Character

Dorset Council is supportive.

Policy EN3: Local Biodiversity

Dorset Council is supportive of the policy objective and its cross reference to the Dorset Biodiversity Appraisal Protocol.

Policy EN4: Local Green Spaces

Dorset Council is supportive of the policy objective and its helpful cross reference to Map 4 and Table 3.

Policy EN5: Land of Local Landscape Importance

Dorset Council is supportive of the policy objective and its helpful cross reference to Map 4 and Table 3.

Policy EN6: Views

Dorset Council is supportive of the policy objective but is concerned that some of the views depicted are distant and expansive rather than defined and discreet. Views should not be expansive but should be from point A to point B. Views over the open countryside are not considered generally acceptable unless they are focused on features.

Policy EN7: Important Open Gap

Dorset Council is supportive of the policy objective to maintain the historic gap between Yetminster and Ryme Intrinsic and the helpful cross reference to Map 4 which clearly depicts the designation both sides of the road.

Policy EN8: Footpaths and Bridleways

Dorset Council is supportive.

Policy CC1: Minimising Carbon Footprint

It is noted that this policy is the same as Policy CC1 of the made Bridport NP and is, therefore, supported.

Policy CC2: Individual and Community Scale Energy

It is noted that this policy is similar to Policy CC4 of the made Bridport NP. Additional reference to the types of renewable energy supported and the importance of the Dorset AONB are welcomed.

Policy CC3: Renewable Energy and Waste Reduction in Building Design

The first part of the policy seeks to support development that reduces waste reduction in building design. This policy criteria is generally supported.

It is noted that the second part of this policy is similar to Policy CC2 of the made Bridport NP and is consequently supported.

Policy CC4: Energy Generation to Offset Predicted Carbon Emissions

It is noted that this policy is very similar in scope to Policy CC3 of the made Bridport NP and is therefore supported.

Policy CC5: Drainage

Dorset Council is supportive.

Policy CS1: Existing Community and Leisure Services and Facilities

Policy CS1 is considered to be in general conformity with adopted Local Plan Policy COM3. The Strategic Approach states that existing facilities will be protected through a flexible approach which recognises the changing needs in society. Listing existing services and facilities is considered helpful.

Policy CS2: New Community and Leisure Services and Facilities

Policy CS2 is considered to be in general conformity with adopted Local Plan Policy COM2. The Strategic Approach states that community facilities should be provided within local communities, recognising the benefit of reducing car travel.

Housing Need

Paragraphs 7.2 to 7.8 helpfully sets out the Neighbourhood Plan’s approach to calculating a notional housing requirement figure for the neighbourhood plan area.

Paragraphs 7.2-7.3 explain that the neighbourhood plan is not a housing market on its own and that the Adopted West Dorset, Weymouth and Portland Local Plan 2015 does not set a localised housing requirement. Policy SUS2 instead states that development in settlements like Yetminster, with a Defined Development Boundary, should be ‘at an appropriate scale for the size of the settlement’ and that this is not defined in numerical terms.

Paragraphs 7.4-7.5 make reference to the West Dorset, Weymouth & Portland Local Plan review (August 2018), however, this work has been in many ways superseded by the emerging Dorset Council Local Plan options consultation (January 2021).

Section 2.10 of the emerging Dorset Council Local Plan proposed a draft housing requirement figure for Neighbourhood Plans based on the sum of; completions since the beginning of the plan period (April 2021), extant planning permissions, adopted housing allocations, capacity on major sites (of 10 or more dwellings) within development boundaries as evidenced through the SHLAA and a windfall allowance on minor sites (of less than 10 dwellings). The housing requirement figure of 152 new homes for Yetminster and Ryme Intrinsic was set out in Appendix 2 of the Plan. This figure was broken down into 78 existing commitments with a windfall allowance on small sites of some 74 dwellings reflecting past delivery rates.

Through further discussions with the Neighbourhood Plan group a double counting issue was identified resulting in a revised windfall allowance of 16 dwellings (rather than 74) and a total housing requirement of 94 dwellings following the same formula. The windfall allowance has been calculated on the basis of 1.6 dwellings per year and has not been applied to the first three years of the Plan period so as to avoid double counting extant consents likely to come forward in this time period.

Paragraph 7.6 of the Neighbourhood Plan therefore seeks to amend the draft Local Plan formula to reflect the Neighbourhood Plan’s proposed plan period (2017 – 2036) rather than the Local Plan period (2021 – 2038). As set out in Table 5 of the Neighbourhood Plan, the updated calculation would be 20 dwellings completed between 2017-2020, 76 commitments and a windfall allowance of 19. Note: a very minor discrepancy with the commitment figure (76 rather than the figure of 78 existing commitments calculated by Dorset Council).

Paragraph 7.7 and Table 6 helpfully update the windfall permissions within the last year (2020-2021) identifying a further 10 dwellings approved and notably above the 1.6 dwelling average but perhaps reflecting the current lack of a five-year housing land supply in the West Dorset and Weymouth & Portland area.

Paragraph 7.8 reflects that a plan target of 115 dwellings seems reasonable having reviewed the information available and Dorset Council agrees.

As an additional note, recent site visits confirm that much of the Folly Farm development has now been completed. This would have no net effect on the overall plan target set out above as the proposed methodology converts commitments into completions.

Defined Development Boundary

Paragraph 7.14 states that the Defined Development Boundary (DDB) for Yetminster has been modified to take account of the housing appeal site at Thornford Road and additional housing site allocations. The modifications to the DDB are shown on Map 3. Paragraph 3.5.4 of the Adopted Local Plan states that “Neighbourhood development plans have the potential to deliver a step-change in the level of growth in the plan area” and lists “extending existing defined development boundaries” as such an example. On this basis Dorset Council support the proposed amendments to the DDB at Yetminster.

Policy H1: Housing Land

Policy H1 lists four proposed housing allocations (Policies H4, H5, H7 & H8) which collectively could help to deliver around 14 additional dwellings above and beyond the housing requirement figure for Yetminster and Ryme Intrinsic. When these additional allocations are combined with other extant consents and infill sites within the DDB and supported development opportunities outside the DDB such as rural workers dwellings, rural exception affordable housing and conversion to existing buildings they will collectively provide further choice and competition in the market.

Policy H2: Housing Types

Paragraph 7.15 explains that “a majority of those who attended the public discussions agreed that limited additional housing of an appropriate kind would add diversity to the housing stock and help bring further life and vitality to the community.” There is a comparatively high proportion of larger houses and fewer smaller dwellings in the two parishes.

Paragraph 7.16 identifies three particular types of housing which the plan should aim to provide, these are housing for older residents, sheltered housing and affordable homes. Policy H2 takes into account the current range of housing types and sizes, and likely demand in the context of changing demographics and places an emphasis on housing adapted to meet the needs of older people, affordable housing types and small (1-2 bedroom) open market dwellings. The policy continues, stating that on sites of 3 or more dwellings larger homes (4 or more bedrooms) should not exceed 20% of the total dwellings (or more than 1 unit on sites of 3 or 4 dwellings). Dorset Council agrees that these housing types are needed locally.

The final paragraph introduces a local connection test which is set out in more detail within paragraph 7.18. Dorset Council welcome the cross reference to the Dorset wide local connection test set out in section 12 of the Draft Housing Allocations Policy (March 2020) and the clarification of adjacent parishes in paragraph 7.19 of the Neighbourhood Plan.

Somerset Levels and Moors

Paragraph 7.13 of the Neighbourhood Plan raises the recently identified issue of increased phosphate levels entering Somerset Levels and Moors Ramsar Site. Chapters 1 & 3 of the accompanying Habitats Regulation Assessment (June 2021) provides further background information on the ‘Phosphate Impacts on Somerset Levels and Moors Ramsar site’.

Chapter 4 undertook an exercise to screen policies within the draft Neighbourhood Plan with the potential for likely significant effects on the Somerset Levels and Moors Ramsar site (either in isolation, or in combination with other development). The screening exercise concluded that, given that Policies H1, H4, H5, H7 & H8 cumulatively “allocate for up to 14 new dwellings within the hydrological catchment of the Somerset Levels and Moors Ramsar Site, and that this new housing will be serviced by Thornford Sewage Treatment Works (STW) which drains into the hydrological catchment of Somerset Levels and Moors Ramsar Site, there is potential for likely significant effects on the European site from increased discharge of phosphates from waste water.”

An Appropriate Assessment of Potential Phosphate Impact on Somerset Levels and Moors Ramsar Site can be found in Chapter 5. Paragraph 5.7 explains that whilst the quantity of new housing detailed within the draft Plan is modest in itself (i.e 14 new dwellings) an impact could arise ‘in combination’ with other existing and future development connected to Thornford STW and other development within the hydrological catchment of the Ramsar site. Paragraph 5.8 notes that the adopted West Dorset, Weymouth and Portland Local Plan 2015 contains policies such as ENV2 which would indirectly provide some protection.

Paragraph 5.10 suggests “achieving nutrient neutrality is one way to address the existing uncertainty surrounding the impact of new development on designated sites”. Natural England advises that a phosphate budget can be calculated for new developments and on the basis of a series of broad assumptions, has been calculated within Table 2 of the Appropriate Assessment for the four proposed allocations in the Neighbourhood Plan.

Paragraph 5.15 concludes “nutrient neutrality would not be met in the absence of mitigation”. As such, paragraph 5.16 proposes that the following text, *‘Housing development will only be supported if it can achieve phosphate neutrality regarding Somerset Levels and Moors Ramsar Site’* should be included within the Plan. Dorset Council is, therefore, supportive of the inclusion of this text within Policy H1 of the Neighbourhood Plan. With the above recommendations incorporated into the Yetminster and Ryne Intrinsic Neighbourhood Plan 2017-2036 it is concluded that no adverse effect would occur on the integrity of Somerset Levels and Moors Ramsar Site.

Dorset Council is also working actively with the other impacted Somerset Local Planning Authorities, Somerset County Council and Natural England to develop further guidance for developers including a phosphate calculator and an off-site mitigation strategy for applications where applicants do not have capacity to provide an on-site solution.

[Policy H4: land fronting Melbury Road, Yetminster](#)

Policy H4 allocates land fronting Melbury road for up to six dwellings subject to four requirements which are considered suitable and specific.

It is noted that bullet point one addresses concerns raised at regulation 14 stage by the Council’s Infrastructure Service and bullet point three seeks to respond to the concerns of the Council’s Conservation Team raised at that time.

At regulation 14 stage the Conservation Team noted that *“The site generally does not seem to be fully understood from a heritage perspective, and further assessment of its significance is required. A cottage stood at the N end of this site in 1840, but by 1886 had been replaced by a structure called ‘The Elm and Green’. Some cobbled paving seems to survive under the grass on the edge of the site, as well as what appears to have been a line of railings or bollards along the frontage, which may or may not relate to an historic use and contribute to its significance.”*

The Neighbourhood Plan group confirm that a further heritage assessment of this site was undertaken which concluded that the site was appropriate for allocation. Harm to the remains of The Elm would be reduced to Low adverse if development were restricted to the west of the hedgerow and the remains were preserved. The Neighbourhood Plan group consider that there are no heritage reasons why the site should not be allocated, and Dorset Council concur.

The Infrastructure Service at Dorset Council has previously stated that “Suitable vehicular access appears achievable but positioning of the access will need to be carefully considered to ensure sufficient visibility sight lines are provided. Pedestrian access remains a concern.”

[Policy H5: the site of ‘Kilbernie, Chapel Lane, Yetminster](#)

Policy H5 allocates the site of Kilbernie for up to three dwellings subject to three requirements which are considered suitable and specific.

At regulation 14 stage, the Council’s Conservation Team raised concern that *“Policy H5 does not refer to the Conservation Area, and it is not clear that the contribution of the site to the setting of Lower Farmhouse has been understood.”*

In response, the Neighbourhood Planning group confirm that a further heritage assessment of this site was undertaken which concluded that the impact to the conservation area and Listed Buildings would be beneficial if high quality, sympathetic design and materials were used, and that the plot could accommodate a pair or row of houses. Dorset Council agree with this conclusion.

The Infrastructure Service at Dorset Council has previously stated that *“Vehicular access should be positioned away from the site boundaries to achieve the necessary visibility splays.”*

[Policy H7: land at Downfield, Ryme Intrinsic](#)

Policy H7 allocates land at Downfield for a single dwelling subject to five requirements which are considered suitable and specific.

The Infrastructure Service at Dorset Council has previously advised that *“Appropriate visibility will need to be provided at the proposed vehicular access.”*

[Policy H8: land at the Old Forge, Ryme Intrinsic](#)

Policy H8 allocates land at the Old Forge for up to four small dwellings subject to five requirements.

At the regulation 14 stage consultation, the Council’s Conservation Team raised the following concerns. *“Given the high grading of St Hippolytus Church, and the correspondingly greater weight to be given to its conservation - such a densification in the immediate vicinity of a Grade II* building which is currently in a quiet and undeveloped setting will clearly have a significant impact on the setting of the building, both visually and in terms of the surrounding context. Though we welcome the designation of the Old Forge as a locally important building (itself therefore needing an understanding of significance and setting), there is simply insufficient information to permit such a considerable and potentially damaging site allocation.”*

The Neighbourhood Plan group have confirmed that a further heritage assessment of this site was undertaken which concluded that the *“developable area of the site would benefit from being redrawn to protect the view of the church when entering the village from the east along Ryme Road. Any development on the site needs to be of appropriate height and massing and carried out using design and materials sensitive to the village’s historic buildings. While development on the site would have an impact on the main range of the Old Forge it is considered that any effect this would have on the significance of the assets would be*

compensated by the removal of the building’s modern additions which would better reveal its significance.” and that on this basis the site could be allocated.

The Council’s Conservation Team has reviewed the revised policy and is content that with the changes proposed, a reduced site capacity of ‘up to’ four units coupled with the expectation that the fourth dwelling would be the conversion of the Old Forge (or possibly two if the Old Forge rear extension is remodelled) would mean two appropriately scaled and designed dwellings within the redline could be positioned so that the set-back position and rural setting of the church (which contributes to its significance) would not be seriously compromised.

The Infrastructure Service at Dorset Council has previously advised that “Appropriate visibility will need to be provided at the proposed vehicular access.”

Policy H9: Design

Dorset Council is supportive of the Policy objective and the cross reference within the supporting text to the Design Guidance set out within Appendix D.

Policy BS1: Sustainable Growth of Businesses

Criterion one supports the development of land or premises for small scale economic enterprise appropriate to the rural nature of the area. This criterion conflicts with adopted Local Plan policy ECON1 which does not set any specific development size limit, being supportive of all forms and scales of development. It is however recognised that access, design and landscape considerations in practice would likely limit the scale of development in Yetminster and Ryme Intrinsic.

Criterion two of the policy replicates the provisions set out in adopted Local Plan policy ECON1 i) but with the addition of Yetminster and Ryme Intrinsic as listed settlements. At regulation 14 stage, a concern was raised because the policy approach appeared to apply to both settlements equally. Yetminster is, however, a settlement with a defined development boundary and considered a more sustainable location for development than Ryme Intrinsic. We note that the group have added additional wording to the supporting text to better emphasise the difference in size between the two settlements and on this basis, we are content with the policy wording.

Criterion three sets out additional design requirements which are broadly welcomed.

Policy T1: Highway Safety

Dorset Council is supportive.

Policy T2: Vehicle Parking

Dorset Council understands the sentiment behind Policy T2 which seeks to meet or exceed car parking spaces set out in the adopted car parking standards. However, the Council would stress that the County Parking Standards remain the agreed standards for determining planning applications. Local Plan Policy COM9 Parking Standards in New Development explains “parking provision should be assessed under the methodology set out in the Bournemouth, Poole & Dorset Residential Study (or its replacement)” taking into account factors such as the level of

accessibility. We are not aware of any local evidence that would support an applicant exceeding these agreed standards.

Recommendation: The first paragraph is amended to read “Development should be designed to meet the number of car parking spaces set out in the adopted car parking standard” omitting ‘exceed’.

Policy T3: Electric Vehicle Charging Points

Policy T3 seeks the appropriate provision for electric vehicle charging points in new development and encourages provision in existing development.

The Revised NPPF 2021, paragraph 112 states that development should “be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

The Road to Zero Strategy (July 2018) states that “the houses we build in the coming years are electric vehicle ready. It is our intention that all new homes, where appropriate, should have a chargepoint available. We plan to consult as soon as possible on introducing a requirement for chargepoint infrastructure for new dwellings in England where appropriate.”

The Government subsequently consulted on Electric Vehicle Charging in Residential and Non-Residential Buildings (July 2019) which proposes to alter building regulations for new residential buildings, new non-residential buildings and existing non-residential buildings to include requirements for electric vehicle chargepoints and infrastructure. Feedback from this consultation is currently being analysed.

In advance of any change in Building Regulations, the Council is supportive of a policy that provides general support for chargepoints in new or existing development.

Implementation and monitoring of the plan

Paragraph 10.1 - Dorset Council welcomes the Parish Council’s intention to annually monitor the Plan following the principles of plan, monitor and manage. The six listed sources of information seem a sensible set of issues to consider.