

## Arne Neighbourhood Plan - Submission Plan – Summary of Representations

Arne Parish Council submitted the Arne Neighbourhood Plan (2018–2034) to Dorset Council for independent examination in October 2019. People were given six weeks from **23 August until 4 October 2019** to comment on the content of the plan or how it was produced. At the close of the public consultation 5 representations were received.

The following table is a summary of the representations received, as required by Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendums) Regulations 2012. Copies of the original, full representations as they were submitted to Dorset Council are available online from:

[www.dorsetcouncil.gov.uk/arne-neighbourhood-plan](http://www.dorsetcouncil.gov.uk/arne-neighbourhood-plan)

| Rep ID | Respondent   | Summary  |
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| 01     | Bidwells on behalf of Bellway Homes and A & F Bagg | <p>We write on behalf of our clients Bellway Homes and A &amp; F Bagg with comments on the submitted Arne Neighbourhood Plan. For background, Bellway Homes and A &amp; F Baggs have been promoting a site on the edge of Wareham (land West of Wareham) for allocation in the Purbeck Local Plan. The site was a preferred allocation at Preferred Allocations stage but is now an omission site after amendments to the submitted Local Plan. Despite lying on the edge of Wareham, the site lies in the Parish of Arne and is covered in the submitted Neighbourhood Plan. Our comments largely relate to how the Neighbourhood Plan addresses the site and deals with the issues of the emerging Purbeck Local Plan and the upcoming Dorset Local Plan review, both of which have a bearing on the Neighbourhood Plan. Relationship with the emerging Purbeck Local Plan The National Planning Practice (ID: 41-009-20190509) sets out: 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 need 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. Given this guidance, we have concerns that the current plan does not give adequate consideration to both the emerging Purbeck Local Plan nor the Dorset Local Plan review, which has recently commenced through a call for sites process. In the introduction (paragraph 2.8) it is correctly stated that the Neighbourhood Plan sits alongside the Adopted Purbeck Local Plan as part of the development plan for the area. However, there is no recognition that the Purbeck Local Plan review is currently at examination nor that a Dorset wide Local Plan review is already underway, both of which could have implications for the Arne. For clarity, this should be acknowledged in the introduction.</p> <p>Local Plans address strategic development in an area with which Neighbourhood Plans should accord. Neighbourhood Plans should reflect these strategic policies and should not seek to deliver less development than is plan in a Local Plan. At page 12, the submission Neighbourhood Plan sets out development constraints that have</p> |

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|  |  | <p>been taken into account in preparing the plan. This includes AONB, SSSIs etc... However, the section goes on to provide an unnecessary overview of the assessment of three sites already assessed through the preparation of the Local Plan. Whilst in our last representation, we encouraged the Neighbourhood Plan to plan for a greater level of housing and to assess sites, what is included is simple a statement of the Local Plan assessments which is not necessary. These summaries should be removed from the Plan as they add nothing, particularly when they relate to strategic sites in excess of the level of growth being considered through the plan. To include the assessments pre-empts the ongoing examination of the Local Plan and potentially undermines the development of the Dorset wide Local Plan. For clarity, text should be added to the Neighbourhood Plan to confirm that: a) Strategic growth in the area is still being considered through the examination of the Purbeck Local Plan, which may lead to allocations in the area (the Plan cannot pre-empt the outcome of the examination); and b) Further growth in the area will need to be considered through the Dorset Local Plan review. Without these amendments, we do not consider that the Neighbourhood Plan meets the basic requirement of having regard to national policy and advice. Does the Plan contribute to sustainable development? Whilst the scale of the site proposed West of Wareham is best dealt with at a strategic Local Plan level, we do have concerns that the housing requirement of 4/5 homes per annum does not meet the basic test of achieving sustainable development. The figure appears to be based on a pro-rata figure of established from the previous completion rates in the Central area of the District, apportioned by the population of the Parish (section 2.1 of the Housing Needs Assessment). Whilst such an approach could be generally acceptable, given the lack of a specific target in the Local Plan, it fails to take into account: a) The revised housing target in the Local Plan (now higher than in previous years); b) The implications of the spatial strategy in the emerging Local Plan which makes limited allocations in Wareham, on the edge of the Parish, despite it being one of the major towns; and c) The likely level of unmet need from the Bournemouth, Christchurch and Poole Unitary authority area. The implication of these omissions is that the housing provisions in the Neighbourhood Plan will not deliver for the likely need of the area. The 4/5 homes target is based on past delivery against a Local Plan requirement of 120 per year. The emerging Purbeck Local Plan has a target of 168, which has already been accepted needs to increase to 180 to reflect the proper use of the standard methodology. The target may increase to beyond 200 depending on the findings of the Inspector. However, a target of 180 reflects a 50% increase in the target which is not reflected in the Neighbourhood Plan assessment of need. In addition, there will be implications for Arne of Wareham effectively not taking it's 'fair share' of growth in the emerging Local Plan. The Local Plan directs growth away from Wareham to the west of the District (an approach currently being debated in the Local Plan examination) which have implications for those who want to live in the Wareham area, but who can't find a home. Settlements in Arne near to the Wareham, will therefore inevitably be one of the first locations these people will look, which will drive up the housing need in the area.</p> <p>Whilst the level of increase in the housing target would be sufficient to justify the allocation west of Wareham, to be sustainable, the housing target needs to increase from the 4/5 currently proposed in ensure that the requirement to reflect national guidance on the use of emerging evidence is satisfied.</p> |
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| 02 | Cllr Ezzard    | <ul style="list-style-type: none"> <li>i) Yes it does</li> <li>ii) Does not confirm that it has regard for the mining/waste plan for Dorset</li> <li>iii) More emphasis on the provision for ITC superfast Broadband coverage for homeworking. No mention of nursery provision currently in place and supports the primary school enormously. No provision for youth club/facilities for sustainable growth for families.</li> <li>iv) Yes it does</li> <li>v) Yes it does</li> <li>vi) Yes it does</li> <li>vii) Yes it does</li> <li>viii) Promote safer route to school more joined up footpaths</li> </ul>  |
| 03 | Dorset Council | <p>This letter has been prepared by Dorset Council in response to the submission draft Arne Neighbourhood Plan which the Council has publicised in accordance with Regulation 16 of The Neighbourhood Plan (General) Regulations 2012. The neighbourhood plan was published 23rd August 2019, and the Council must receive any responses by Friday 4th October 2019. The Council has published relevant details of the plan, where it may be inspected, the procedure for making a response (including clarification that respondents may request to receive notification of the Council’s decision on whether the neighbourhood plan should be ‘made’) and the deadline for making a response on its website. The Council has sought to support Arne Parish Council in the preparation of their plan, and as part of this made comments on the pre-submission draft Arne Neighbourhood Plan (published between 7th December 2018 and 25th January 2019) in accordance with Regulation 14. The Parish Council has sought to take account of the Council’s response with modifications to the submission draft version of the neighbourhood plan. The Council has reviewed the submission draft of the local plan and wishes to make the following further response:</p> <p>Policy 1: House Types</p> <p>The Council notes changes to supporting text (paragraph 8.1.2) of Policy 1, but it does not consider that the policy clearly and precisely defines the trigger meeting the policies requirements around affordable homes or the proportion, or tenure mix, of affordable homes that the Parish Council expects ‘should’ be delivered on ‘housing sites’. Policy H11 in the emerging Purbeck Local Plan states that ‘A commuted sum will be sought from sites of between 2 and 9 homes and for any part homes from sites of 10 or more homes after provision of all whole homes required on site.’ Dorset Council has a housing allocations policy (including a local connection qualification requirement) for affordable homes. The requirement of policy 1 (in respect to the planning conditions/obligations</p> |

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|  |  | <p>to ensure allocation to people with local connections first) and supporting text paragraphs 8.1.3 and 8.1.4 are not consistent with this housing policy.</p> <p>Policy 2: No comment</p> <p>Policy 3: No comment</p> <p>Policy 4: Small sites</p> <p>The requirements limiting the total supply of homes from small sites, and limiting the number of homes permitted on small sites, are not in general conformity with the emerging small sites policy (strategic policy) in the Purbeck Local Plan. The criteria relating to flood risk is not necessary, as planning applications for small sites will be assessed against policy in the National Planning Policy Framework (taking account of Planning Practice Guidance) including the: sequential and exceptions tests. The term ‘second homes’ is not defined in the neighbourhood plan – the Council has a second homes policy (in the plan which it has submitted for examination) which requires a condition to be applied on planning permissions for new homes in the AONB, small sites and rural exception sites that restricts their occupation as ‘second homes’</p> <p>Policy 5: No comment</p> <p>Policy 6: Sheltered Housing</p> <p>It is not clear whether the Parish Council intends that ‘sheltered’ housing, referred to in the first paragraph of the policy, is also a C2 use. The clause of the policy which limits the occupation of the sheltered/care based housing does not appear to be justified. The criteria relating to flood risk is not necessary, as planning applications for small sites will be assessed against policy in the National Planning Policy Framework (taking account of Planning Practice Guidance) including the: sequential and exceptions tests.</p> <p>Policy 7: No comment</p> <p>Policy 8: No comment</p> <p>Policy 9: No comment</p> <p>Policy 10: No comment</p> <p>Policy 11: No comment</p> <p>Policy 12: The policy refers to the requirements for open space on housing sites – it is unclear what these requirements are (reference Policies 1, 4, 5 and 6.</p> |
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|  |  | <p>Other comments</p> <p>The pre-submission draft neighbourhood plan does not refer to viability as a planning consideration. It is not clear whether the requirements to deliver a mix of different types of homes, and affordable homes as referenced in Policy 1, can be delivered. Paragraph 6.6 indicates a preference for small scale rural exceptions sites formed from between 1 and 3 new homes. Officers in the Council’s housing team have suggested that small rural exception sites (of this scale) by may not be viable for developers or practicable to run for social housing providers.</p> <p>Emerging Purbeck Local Plan</p> <p>Whilst commenting on the draft Arne Neighbourhood Plan the Council has also been preparing a new local plan for Purbeck (which includes the designated neighbourhood plan area for Arne). Purbeck District Council published the pre-submission draft of its local plan between 22nd October and 3rd December 2018. The emerging Purbeck Local Plan was submitted for examination on 28th January 2019. The Inspector who is examining the Council’s local plan has held hearing sessions into the local plan in July and August 2019. A further set of hearings are scheduled in October 2019. The emerging local plan includes policies relating to:</p> <ul style="list-style-type: none"> <li>• local housing requirement (Policy H1);</li> <li>• housing land supply (Policy H2);</li> <li>• permitting small numbers of homes around existing settlements (Policy H8);</li> <li>• house type and mix (Policy H9); • design standards for new homes (Policy H10);</li> <li>• affordable housing (Policy H11); and</li> <li>• the way new homes are occupied (‘second homes’) (Policy H14). Following discussions during the examination hearings the Council has suggested modifications to the Purbeck Local Plan to:             <ul style="list-style-type: none"> <li>• clarify those policies which are strategic and non-strategic (see SD 91 (<a href="https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/localplan-review-purbeck/pdfs/examination-documents-submitted-during-hearings/sd91-council-response-to-actions-8-9-and-10-final.pdf">https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/localplan-review-purbeck/pdfs/examination-documents-submitted-during-hearings/sd91-council-response-to-actions-8-9-and-10-final.pdf</a>));</li> <li>• avoid conflict between policies in the emerging local plan and made/emerging neighbourhood plans, including:                 <ol style="list-style-type: none"> <li>i. policies: H8 (small sites next to existing settlements), H9 (housing mix), H10 (part M of the Building Regulations) and H11 (affordable housing);</li> </ol> </li> </ul> </li> </ul> |
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|    |               | <p>ii. and supporting text relating to policies: E12 (design), I2 (improving accessibility and transport), I3 (green infrastructure, trees and hedgerows) and I4 (recreation, sport and open space).</p> <p>The Council expects to receive a decision from the Inspector on whether the Purbeck Local Plan is sound, and legally compliant, later this year. (Details relating to the examination can be assessed from the Council’s website: <a href="https://www.dorsetcouncil.gov.uk/planning-buildingsland/planning-policy/purbeck/local-plan-review-purbeck/local-plan-review-purbeck.aspx">https://www.dorsetcouncil.gov.uk/planning-buildingsland/planning-policy/purbeck/local-plan-review-purbeck/local-plan-review-purbeck.aspx</a> ).</p>   |
| 04 | Halsall Homes | <p>Origin3 have been instructed to submit Representation on the Regulation. 16 draft Arne Neighbourhood Plan (2018-2034) on behalf of Halsall Homes. Their specific land interest relates to land at Steppingstones Field, Stoborough which they are promoting for residential development. An outline planning application (ref. 6/2019/0400) for 30 dwellings on the site is currently pending determination. A site location plan is attached at appendix 1.</p> <p>We support the principle of empowering local communities in developing a vision for their neighbourhood and in shaping the development and growth of their local area, however we have a number of fundamental concerns with the Arne Neighbourhood Plan as currently drafted. The purpose of a Neighbourhood Plan is to positively and proactively prepare a strategy for development which supports the delivery of new homes, infrastructure and other forms of development. A Neighbourhood Plan should not encumber or restrict growth, but be positively prepared to support sustainable development (para 10, NPPF).</p> <p>The draft Arne Neighbourhood Plan as currently drafted proposes to adopt restrictive housing development policies without any underlying evidential basis, which is required by NPPF (para 16). We therefore raise concern with the Neighbourhood Plan’s approach to housing delivery which could only frustrate, rather than enable the achievement of sustainable development. We consider that a number of changes are needed to ensure that the Neighbourhood Plan meets the basic conditions test set out within National planning policy and guidance. With this in mind, we have set out below our comments to Dorset Council Planning Policy team in relation to the Reg. 16 draft Arne Neighbourhood Plan. Our detailed Representation is set out below under the following key headings:</p> <ul style="list-style-type: none"> <li>• The Basic Conditions</li> <li>• Response to the draft policies</li> </ul> <p>The Basic Conditions In order for a draft Neighbourhood Plan to be put to referendum and be ‘made’, the Plan must meet a set of basic conditions. The basic conditions are set out in paragraph 8(2) of Schedule 4B of the Town and County Planning Act (1990) as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:</p> |

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|  | <p>a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,</p> <p>b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,</p> <p>c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,</p> <p>d) The making of the order contributes to the achievement of sustainable development,</p> <p>e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),</p> <p>f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and</p> <p>(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p> <p>With particular regard to the basic conditions underlined above, it is considered that the draft Arne Neighbourhood Plan as currently drafted fails to meet these. In terms of basic condition (a), conformity with national policies and Secretary of State Guidance, the National Planning Policy Framework (the Framework) set out the Government’s planning policies for England and how these are expected to be applied. The NPPF (para. 16) is clear that plan-making should:</p> <p>a) be prepared with the objective of contributing to the achievement of sustainable development;</p> <p>b) be prepared positively, in a way that is aspirational but deliverable;</p> <p>c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</p> <p>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</p> <p>The Framework is clear in its advice that Local Planning Authorities (LPAs) should bring forward a sufficient amount and variety of housing land, where it is needed, to support the Government’s objective of “significantly boosting the supply of homes”. At the heart of the Framework is a presumption in favour of sustainable development. For</p> |
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|  |  | <p>plan-making this means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (para. 11)</p> <p>The National Planning Practice Guidance is clear that neighbourhood planning should provide the “opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see” (Paragraph: 003 Reference ID: 41-003-20190509)</p> <p>We have concerns that the draft Arne Neighbourhood Plan has not been positively prepared and would fail to support the development needs of the area across the plan period (thus falling foul of basic condition (a)).</p> <p>Once ‘made’, Neighbourhood Plan’s form part of the Statutory Development Plan, and the NPPF is clear on the approach which Neighbourhood Plan’s should take:</p> <p>“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.” (para. 13) and “Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies” (para. 29)</p> <p>This is further evidenced within the National Planning Practice Guidance which states that “Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.” (Paragraph: 001 Reference ID: 41-001- 20190509)</p> <p>The intention therefore is that Neighbourhood Plan’s should follow the strategic aims of a post-NPPF adopted Local Plan, including housing requirements. It is evident from the plan period (2018-2034) which the Arne Neighbourhood Plan is framed that the Neighbourhood Plan is being prepared in the context of the emerging Purbeck Local Plan Review which shares the same plan period.</p> <p>It should be noted that the strategic policies in the PLP1 (which includes housing numbers and distribution) could be considered out-of-date because they are more than five years old. Furthermore, the Inspector who examined the PLP1 recognised that the proposed level of housing was below the objectively assessed need. He concluded that the plan should commit to a partial review and for the review to be adopted during 2017. This review which now takes the form of a more substantial Local Plan Review has yet to be adopted, two years late.</p> <p>It is therefore queried whether the adopted policies contained in the PLP1 are an appropriate basis on which to prepare the Arne Neighbourhood Plan? Whilst the Council’s latest monitoring data suggests that at a District level the adopted policies in the PLP1 are delivering a sufficient number of new homes in line with its housing trajectory,</p> |
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|  |  | <p>the same cannot be said of housing delivery at a local level within Arne Parish including affordable delivery. This highlights the short comings of basing a neighbourhood plan on these policies and approaches.</p> <p>There is no definite housing target for the Arne Neighbourhood Plan area in the adopted PLP1, but a pro-rata share of the Central Area target would suggest a potential target of 3 dwellings per annum. However, as noted above, the PLP1 target did not meet the full objectively assessed needs, a slight upward adjustment could be appropriate.</p> <p>At a local level, the latest available data suggest that since the start of the plan period past build rates have average 2.4 dwellings per annum in Arne Parish (24 dwellings between 2006-2016). Past build out rates are therefore below that of the 3 dwelling per annum pro-rata share. In terms of affordable housing, since 2006, only 306 affordable dwellings (26 units per annum) have been delivered across the District against a target of 780 across the plan period (37 units per annum).</p> <p>No affordable housing delivery has taken place in Arne parish since the start of the plan period, in fact the last affordable property delivered in Arne Parish was in 1992. It is therefore imperative that the emerging policy context provides a sufficient mechanism for lower order settlements such as Stoborough to organically grow to meet identified future housing needs and the emerging Arne Neighbourhood plan could provide that opportunity should it look to positively plan for growth to meet recongised needs.</p> <p>Response to the draft Policies</p> <p>We believe that there are a number of policies in the draft Arne Neighbourhood Plan which require revision in order to be consistent with up-to-date policy and guidance. These are set out below.</p> <p>Policy 1: House Types Draft policy H1 sets out that “housing sites should deliver a mix of home types, taking into account current evidence of local need, and should mainly include affordable housing types, one and two bedroom open market homes, and homes specifically designed for an ageing population.”</p> <p>It is considered that the wording of draft policy H1 is not sufficiently clear or robust and the phrase “mainly include” is queried. Para 16 of NPPF states that policies should be clearly written, unambiguous and give certainty to decision maker how to react to development proposals.</p> <p>The draft Arne Neighbourhood Plan supports the delivery of new dwellings on sites no greater than 6 dwellings. This restrictive provision is unlikely to achieve an appropriate level of growth and could fail to make a meaningful contribution towards the delivery of affordable housing. Such small scale proposals offer very limited scope to deliver a range of house types, sizes and tenure to meet the priority housing needs. Indeed, with a maximum capacity of just 6 dwellings, this will undoubtedly drive developers to maximise the floor space of the units to achieve the maximum development coverage.</p> |
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|  | <p>There would be no incentive for such sites to deliver smaller more affordable units. In order to address the housing need required and optimise the availability of housing to local residents, it is necessary for the Arne Neighbourhood Plan to promote development land of a scale which is capable of providing a mix of house types to meet local needs, including smaller more affordable homes including affordable housing. The support for larger development site/s is essential in order to deliver these benefits to the community and support the vitality of key services and community facilities.</p> <p>Policy 4: Small Sites Policy 4 sets out that future housing growth in Arne Parish will be limited to small-scale development to meet local housing need, subject to the criteria listed in the policy.</p> <p>Stoborough fulfils a role of a local hub and provides access to a number of the key facilities including a primary school, village hall, petrol station, recreation ground, public house and has a regular bus service to wider access to services and facilities.</p> <p>It is important that the Arne Neighbourhood Plan recognises Stoborough’s ability to sustainably accommodate new growth. Stoborough is identified as a ‘Local Service Village’ within the extant Development Plan, a third tier settlement with the District’s hierarchy (below towns and key service villages).</p> <p>Stoborough is the third largest settlement in the Central Purbeck area (below Wareham and Sandford) and therefore forms an important part of both the District and sub-district’s growth strategy and has a role to play in accommodating future growth. It is critical that the emerging Arne Neighbourhood Plan have regard to para. 59 of the NPPF which states that one of the Government objective is “significantly boosting the supply of homes” ensuring that a “sufficient amount and variety of land can come forward where it is needed, that the needs of groups within specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.</p> <p>Comment on criteria pursuant to Policy 4 is set out below.</p> <ul style="list-style-type: none"> <li>• Be within, adjoin or otherwise well-related to the defined development boundaries of Stoborough or Ridge, excluding any sites within 400m buffer around protected heathlands Ridge is a cluster of dwellings and mobile homes and provides no access to services or facilities. The pedestrian route from Ridge to Stoborough, where the majority of the immediate local facilities are located would be on the border of attractive distances to pedestrians (1,200m) (Providing for Journeys on Foot, IHT, 2000), and via a secluded, unlit and country lane which lacks any pedestrian facilities and is subject to national speed limits. This would not provide a comfortable or suitable walking environment and so additional growth at Ridge would likely result in unsustainable travel patterns with people relying on private vehicles. New housing growth should therefore be directed towards Stoborough which is sustainably able to accommodate new growth in close proximity to key services and facilities. The latter part of the criteria seeks to exclude any sites within the 400m buffer around the protected heathlands. As presently drafted</li> </ul> |
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|  |  | <p>this part of the policy is not consistent with the extant Purbeck District heathlands policy contained within the Dorset Heathland Planning Framework (2015-2020) SPD (January 2016) which seeks no net increase in residential development within the buffer zone. Development sites can therefore be partially located within the buffer zone as long no net increase in residential development takes place within the 400m buffer zone itself.</p> <ul style="list-style-type: none"> <li>• Not result in the total supply permitted from small sites exceeding about thirty dwellings in total during the plan period, and no more than twenty dwellings should be permitted in the first five years of the plan being made. The imposition of a maximum figure for housing creates a significant and fundamental conflict with para 60 of the NPPF as it would not allow for any new residential development, no matter how sustainable, above the maximum figure (para 60 looks to identify the “minimum” number of homes needed). The setting of a cap on overall housing needs could lead to the undermining of the housing growth set out at the District level and impact on the District’s ability to deliver its overall distribution strategy for future growth.</li> </ul> <p>The above criteria therefore fails basic condition (a) in having regard to National Planning Policies, specifically the presumption in favour of sustainable development which is at the heart of the Framework and also the requirement for plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF, para. 11).</p> <p>Policies at a District level would still control the amount of development at any particular settlement, ensuring growth levels are commensurate with the role and function of the particular settlement and ensuring that additional growth does not cause friction, conflict or imbalance against the settlement hierarchy.</p> <p>The Arne Neighbourhood Plan is supported by a Housing Need Assessment which suggests that a reasonable housing target for Arne would be 3-4 new dwellings per annum which across the plan period (2018-2034) would equate to between 48-64 dwellings. It is understood that the Arne Neighbourhood Plan has sought to take forward a lower housing figure (30 dwellings) and set this as a maximum figure due to concerns over potential impact on European and internationally designated sites and suitable mitigation following advice from Natural England.</p> <p>We are not aware of any evidence put forward that demonstrates how developments of more than 30 dwellings would have any demonstrable/significant adverse impacts. As required by National policy, planning policies are required to be justified and based on evidence (para 16).</p> <p>The attached pre-application advice sought from Natural England during February 2018 in respect of our client’s site at Steppingstones, confirms that if a proposed development was less than 40 units (and remained outside of the 400m Heathland ‘exclusion’ zone), mitigation for recreation impacts could be achieved through CIL (to go towards a Heathland HIP and SAMM, and Poole Harbour SAMM). The basis on which the Arne Neighbourhood Plan seeks to amend the approach as presently set out within the adopted Dorset Heathland Planning Framework is unclear.</p> |
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|  | <p>As noted above, it is not clear what evidence there is to support the 30 dwelling overall housing requirement figure and also the individual site cap of 6 dwellings. The Arne Neighbourhood Plan should not promote an arbitrary upper limit of the number of houses permissible. Policies should be underpinned by robust evidence in order to be justified as required by National planning policy. Any housing requirement figure established in the Neighbourhood Plan should be expressed as a minimum and not treated as a maximum or ceiling figure. The imposition of a maximum figure for housing creates a significant and fundamental conflict with the NPPF as could prevent the delivery of sustainable development.</p> <p>The approach taken by Natural England through the Arne Neighbourhood Plans appears to be inconsistent with guidance currently set out in the adopted Dorset Heathland Planning Framework and also the pre-application advice previously received for the site. It is queried whether it may be more appropriate for any ‘small sites’ policy to reflect the fact that each potentially suitable site is different and should be considered on its merits and on a case-by-case basis by not including arbitrary upper level figures / caps. Through this permissive approach it would then enable development to be justified through the development management process.</p> <ul style="list-style-type: none"> <li>• Not exceed six dwellings on any one site or eventually become a larger site than six dwellings through the subsequent development of adjacent ‘small sites’</li> </ul> <p>Policies contained within the Arne Neighbourhood Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change as set out within the NPPF (para. 11). The six dwelling site cap would appear to be entirely arbitrary and without evidential basis. As noted above, we are not aware of any evidence put forward that demonstrates how developments of more than 6 dwellings per site would have any demonstrable/significant adverse impacts. Paragraph 117 of the NPPF (February 2019) requires planning policies to promote an effective use of land in meeting the need for homes and other uses, whilst paragraph 122 states that planning policies should support development that makes efficient use of land. Paragraph 123 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. The introduction of a maximum level of development on individual sites irrespective of their size or physical characteristics cannot and does not ensure that land is used efficiently or effectively. Smaller schemes are also less likely to be viable for the full contribution of planning obligations including affordable housing.</p> <p>Smaller schemes can also create management issues for affordable housing providers that generally require affordable housing to be grouped together in manageable parcels rather than in smaller groups or individual houses. Furthermore, it is prudent to note that the emerging Purbeck Local Plan Review is seeking to amend the district wide affordable housing policy so that sites of between 2 and 9 homes can make provision for affordable housing through a commuted sum i.e. off-site. As such, there maintains a credible and real risk that through the</p> |
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|  |  | <p>Arne Neighbourhood Plan which supports growth on sites of no greater than 6 dwellings, that affordable housing delivery would take the form of off-site commuted sums and therefore no on-site provision would take place. This is of concern given Arne Parish has not received any affordable housing since 1992, 27 years ago. Given that the average house price in Arne has increased gradually in the last five years, averaging about £400,000, a comparison to incomes would undoubtedly demonstrate that affordability is an issue and the non-delivery of affordable housing is a social issue in the settlement.</p> <p>Larger schemes are advantageous in terms of social / economic benefits as a mix of dwellings and allow infrastructure funding and improvements to be planned in a more coordinated way. Piecemeal development of a series of smaller developments would also not deliver a range of dwellings. We therefore consider that the basis of an upper limit on the number of houses permissible pursuant to Policy 4 is flawed and it is unclear what this threshold is seeking to achieve, other than frustrate future development proposals above the threshold, which are otherwise entirely sustainable.</p> <p>In fact, the limit of 6 dwellings may prohibit the most suitable sites from being developed, and lead to less suitable sites coming forward. For example, a site capable of accommodating 30 dwellings may be more suitable (in terms of factors such as landscape, ecology, accessibility etc.) than five alternative sites of six dwellings elsewhere within the village. However, the terms of Policy 4 as presently drafted, the more suitable site would be prevented from coming forward on a purely numerical basis which has little (if anything) to do with the planning merits of the site.</p> <p>The upper limit on permissible windfall sites serves no planning purpose. It is contrary to basic condition 8(2)(d) because the proposed approach cannot contribute to the achievement of sustainable development. It can only frustrate otherwise sustainable developments of more than 6 dwellings coming forward. As a result, it may result in less sustainable developments in less suitable locations coming forward for development.</p> <p>In summary, we have serious concerns about the wording of draft Policy 4 namely in respect of the arbitrary upper limit of the number of houses permissible overall and per individual site. We would suggest that Policy 4 is revised in order to provide greater flexibility allowing for sustainable sites to come forward beyond the identified settlement boundaries of Arne, such that the Arne Neighbourhood Plan is able to respond to the identified need flexibly.</p> <p>Land at Steppingstones</p> <p>A recent Housing Needs Assessment (June 2019) carried out by Dorset Council confirmed that there are currently 7 households in need of affordable housing in the Parish and an additional 7 households on the Council’s Housing Register. Land at Steppingstones Field is capable of delivering a level of housing growth to provide for a more balanced community including an affordable housing provision which would address the current identified need. New housing growth would also support local services and facilities. The site is in close proximity to key services and facilities (school, recreation ground, Holne Road SANG and the village hall). The site is wholly located within</p> |
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|    |                  | <p>flood zone 1 and there are no designated heritage assets affected by developing the site. Development would be of high design quality and would be in keeping with the surrounding area and would also provide community infrastructure benefits through Community Infrastructure Levy and Section 106 obligations.</p> <p>Summary and Conclusion</p> <p>We consider that a number of changes are needed to ensure that the Arne Neighbourhood Plan meets the basic condition. As currently proposed, it is considered that the Arne Neighbourhood Plan serves to restrict development as opposed to proactively guide development to meet local needs across the plan period. Halsall Homes is promoting land at Steppingstones Field for residential development. The site is considered suitable for development and is capable of contributing to meeting housing needs in the area.</p> <p>Details of Consultation meeting attached</p>   |
| 05 | Rempstone Estate | <p>Terence O’Rourke Ltd represents the Rempstone Estate, who has significant land interests within Arne Parish including land to the north of West Lane at the western end of Stoborough. We have reviewed the final draft Neighbourhood Plan on behalf of the Estate and wish to make the following observations / comments / objections. Executive summary Page 26 of the Arne Neighbourhood Plan Consultation Statement June 2019 reports that on the basis of household surveys undertaken within the parish, the proportion of residents favouring large scale development (defined by 92% at 10-40 houses) had increased from 31% in 2002 to 71% by November 2014. It also states that less than 5% of households favour larger development, which means that less than 29% of the parish support developments of less than 10 units.</p> <p>With this in mind, paragraph 1.3 of the neighbourhood plan states that there is “an appetite for a limited amount of small scale housing development” within the parish. Whilst the evidence base suggests that this is factually correct, the evidence base clearly indicates that there is a much greater appetite for larger developments of between 10 and 40 units within the parish, a fact which is not reflected within the executive summary. We are therefore concerned that the thrust of the plan and indeed the policies within it are not evidence based because they do not accurately reflect the views of parish households.</p> <p>Section 1</p> <p>Paragraph 1.6 of the draft neighbourhood plan states that “other than in exceptional cases, future development should be infill within the existing settlement boundaries to support the unique character of the villages and protect the open countryside”. However, Purbeck District Council’s 2019 Strategic Housing Land Availability Assessment clearly shows that there are very few opportunities for infill development within the parish. The</p> |

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|  |  | <p>statement in paragraph 1.6 is therefore neither supported by the views of households nor the district council's evidence base.</p> <p>Section 3</p> <p>Paragraph 3.7 of the draft plan states that additional housing should meet the needs of local people who wish to remain in the area, and that affordability, especially for young people looking to establish homes and send their children to the local school, is a major focus. Whilst we do not have any issue with this objective, policy H11 of the draft Purbeck Local Plan 2019 (which is currently at examination) indicates that up to 40% affordable housing provision should be provided on-site for all sites of 10 or more homes, but that for developments of between 2 and 9 dwellings only 20% affordable housing needs to be provided. Such provision would be in the form of a financial contribution rather than on-site provision. Therefore, if the Purbeck Local Plan is found sound ahead of the adoption of the Arne Neighbourhood plan, the draft neighbourhood plan's strategy of relying on developments of less than 6 units (policy 1) is unlikely to deliver the plan's affordable housing objectives because there is no guarantee that the financial contributions given to Dorset Council for affordable housing would be spent on the delivery of affordable housing within Arne parish.</p> <p>Section 6 Paragraph 6.4 states that the vast majority (71%) of respondents to the parish survey indicated a preference for up to 30 homes over the lifetime of the neighbourhood plan, whereas the evidence base (page 26 of the consultation statement from June 2019) actually states that 71% of respondents indicated a preference for between 10 and 40 homes. This inconsistency needs to be addressed.</p> <p>Section 7 Paragraph 7.9 of the neighbourhood plan explains that any development of the sites alongside West Lane (including our client's site) is strongly opposed by a significant number of residents due to the congested, barrow and un-paved nature of West Lane, exacerbated by its use as a link between Corfe Road and the bypass and strengthened by the use of West Lane as the main pick-up and drop-off area for the school. However, the emerging Purbeck Local Plan identifies both sites as available and suitable for development as small sites so there is clear conflict between the neighbourhood plan and the Purbeck Local Plan concerning the principle of development on these sites.</p> <p>This conflict is reflected on map 3. One of the basic conditions for a neighbourhood plan is that the plan is in general conformity with the strategic policies in the development plan for the area. In August 2019, Purbeck District Council published a number of documents in conjunction with the local plan examination, one of which (SD91) confirmed that policy H8 (small sites policy) is a strategic policy and that as a consequence, there was a potential conflict between this policy and policy 4 of the Arne Neighbourhood Plan which also deals with small sites. Given that the district council has highlighted a potential conflict between the two plans, the neighbourhood plan needs to be amended.</p> |
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|  |  | <p>Policy 1 – House types</p> <p>Policy 1 of the draft neighbourhood plan states that sites should:</p> <ul style="list-style-type: none"> <li>• deliver a mix of home types, taking into account current evidence of local need</li> <li>• mainly include affordable housing types, one and two bedroom open market homes and homes specifically designed for an ageing population such as sheltered housing and units designed for multigenerational living</li> <li>• private garden space where feasible</li> <li>• housing of a mix of sizes. Whilst we support many of these objectives, we object to sites having to provide “mainly” affordable housing types, one and two bedroom units and homes specifically designed for an ageing population because: 1. the policies of the Purbeck Local Plan Part 1 (2012) state that the housing mix for a particular site is a matter for negotiation reflecting the findings of the Strategic Housing Market Assessment 2. the policies of the Purbeck Local Plan Part 1 (2012) do not contain any policies that require the provision of specialist housing for the elderly on any site 3. tables 28, 29 and 30 of the Strategic Housing Market Assessment (SHMA) Update for Purbeck (October 2018) indicate that for any particular development in Purbeck, a maximum of 40% of open market units in a development should comprise 1 and 2 bedroom units 4. under policy H8 of the emerging Purbeck Local Plan, a development of more than 10 units only requires 40% affordable housing provision, whilst a development of between 2 and 9 units only requires 20% affordable provision in the form of a financial contribution, and neither 20% nor 40% can be considered “mainly”.</li> </ul> <p>Policy 1 of the draft neighbourhood plan does not therefore accord with either the adopted Purbeck Local Plan Part 1 or strategic policy H8 of the emerging Purbeck Local Plan, and it therefore fails one of the basic conditions required of neighbourhood plans.</p> <p>Paragraph 8.4.2</p> <p>This paragraph reports that a clear majority of respondents indicated a preference for about 30 new homes over the lifetime of the neighbourhood plan, yet as indicated above, the evidence base states that 71% of respondents supported developments of between 10 and 40 dwellings. The reference to an upper limit of 30 dwellings is therefore not supported by the evidence base.</p> <p>Paragraph 8.4.3</p> <p>Paragraph 8.4.3 states that Natural England has advised Arne Parish Council that a limit of six homes per site would be appropriate to ensure that the individual and cumulative effect of the sites does not give rise to significant environment impacts, most notably to the European Heathlands. The paragraph continues to state that Natural England would also be concerned if the cumulative number of dwellings delivered through this policy was to exceed 30 within the plan period or 20 within the first five years of the plan being made. No evidence to back up</p> |
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|  |  | <p>this statement has been provided and moreover, in Natural England’s June 2019 response to Halsall Homes’ planning application for 30 dwellings on land at Steppingstones Field south of West Lane, Natural England made no reference to a need to limit the scale of development at the site to six units. When referring to policy 4 of the Arne Neighbourhood Plan in their consultation response, all Natural England did was to refer to the fact that a “proportionate” development was likely to resolve concerns relating to impacts on internationally important heathlands and the Area of Outstanding Natural Beauty. In short, there is no evidence to support a limit of six units per site within the Neighbourhood plan and all references should be removed.</p> <p>Policy 4 – Small sites</p> <p>Policy 4 states that future housing growth in Arne Parish will be limited to smallscale developments to meet local housing need. Whilst this is understood and accepted, we object to (a) the cap on supply from small sites exceeding 30 dwellings in total during the plan period, and no more than 20 dwellings in the first five years of the plan being made, and (b) a cap of six dwellings on any one site. The grounds for our objection are as follows. Principally due to environmental designations and a prohibition on residential development within 400 metres of a Dorset heathland, a very large part of Purbeck District is unable to accommodate residential development. As a consequence, it is vital that sites which are able to support residential development in a sustainable manner are allowed to come forward. Amended policy H8 of the emerging Purbeck Local Plan sets out the circumstances where applications for small sites will be permitted. Whilst this policy has yet to be found sound, it seeks to impose a limit of 15 dwellings on individual sites in local service villages such as Stoborough, which is clearly greater than the limit of six units identified in the draft Neighbourhood Plan. It is a requirement of neighbourhood plans to have regard to national policy.</p> <p>Paragraph 122 of the National Planning Policy Framework (February 2019) requires planning policies and decisions to support development that makes efficient use of land, taking into account a variety of factors including:</p> <ul style="list-style-type: none"> <li>• the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it</li> <li>• local market conditions and viability</li> <li>• the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use</li> <li>• the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and</li> <li>• the importance of securing well-designed, attractive and healthy places. In view of the housing crisis in the UK, the pressing need for housing in Purbeck and the general lack of available sites in Purbeck (and Stoborough), there is no planning, environmental or commercial justification, logic or evidence base behind limiting the capacity of</li> </ul> |
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|  |  | <p>development within the parish to 30 dwellings, or to restricting development to 20 dwellings within the first five years of the plan or to limiting the capacity of each site to six units.</p> <p>The policy also fails to take account of any of the factors listed as part of paragraph 122 of the NPPF, making it contrary to national policy, and is also in conflict with policy 6 where an upper limit of 10 sheltered housing units per site is suggested. The policy needs to be amended through the removal of all arbitrary and unevidenced capacity restrictions.</p> <p>As always, the Estate and ourselves remain open to a dialogue with the parish council and/or the neighbourhood plan steering group concerning the potential future development of their land to the north of West Lane, and we would be happy to meet at your convenience should you wish to suggest a suitable date</p> |
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