



FOA: Anne Goldsmith
North Dorset District Council
Planning Policy
Blandford Forum
Salisbury Road
Dorset
DT11 7LL

By email only to: 

Re: Sturminster Newton Neighbourhood Plan – Joint Response to Examiners Questions

Dear Sir/Madam,

Gladman welcome the opportunity to provide our thoughts in respect of the joint response to the Examiner's questions appertaining to the submitted version of the Sturminster Newton Neighbourhood Plan.

As you are aware, as part of the Regulation 16 consultation, Gladman provided a comprehensive response to a number of the policies contained within the plan and raised specific concerns regarding the ability of these policies to meet Basic Conditions.

Whilst we recognise that Sturminster Newton Town Council and North Dorset District Council have provided a substantial response to the questions raised by the Examiner, Gladman continue to have a number of concerns regarding the SNNP and have set out our thoughts below in respect of the response to the concerns we have previously raised.

Housing Requirement

In respect of the issue of housing numbers, Gladman note the Town Council's response to our comments regarding the housing requirement being expressed as a minimum. We do however continue, for the purposes of consistency, to consider it appropriate that Policy 7 explicitly expresses any requirement as a minimum, and do not consider that the first sentence of the policy makes it clear that the figure of 395 dwellings per annum is not to be considered a cap on development.

Further we note that the Town Council, as part of the joint response, consider that the matter of housing numbers, is a strategic issue that should be dealt with by the District Council. Therefore, we are concerned, that from the response to the Regulation 14 consultation on the pre-submission version of the SNNP, the District Council's concerns regarding the use of the most appropriate and up-to-date housing need evidence, have seemingly been disregarded.

We do not believe, from the joint response received that this issue has been sufficiently addressed and see no evidence to suggest that the District Council are fully supportive of the decision to continue with the 395 dpa figure derived from the LPP1.

Gladman have previously recommend that sufficient flexibility should be written into the SNNP's policies to respond to changing local circumstances, and to address the district's strategic development needs. The SNNP should acknowledge the aspirations of the Council's emerging Local Plan, including its preferences for the future direction of growth within the town and indeed the latest evidence surrounding housing need in the area. We remain concerned that the SNNP does not include that required flexibility within its policies.

Gladman note the proposed amendments to paragraph 4.3.4 of the SNNP (replacing part of the current text with "*...one or more of the provisions set out in paragraph 14 of the revised NPPF do not apply*"), however we are unclear on what this change is expected to achieve, when read in conjunction with the purpose of the paragraph as a whole.

SEA and Deliverability

Gladman continue to express significant concerns in respect of the submitted SEA and in particular, the assessment of reasonable alternatives.

We are not satisfied that our concerns in respect of Policy 31 of the SNNP have been sufficiently addressed, and still consider that insufficient commentary is provided within the SEA to demonstrate why some of the decisions have been made. We would like to reiterate our previous submissions, in so far as these emphasised that the decision making and scoring of the SEA should be robust, justified and transparent and should be based on a comparative and equal assessment of each reasonable alternative. We do not consider that the scoring of the SEA has been carried out in this manner.

Beyond this, we note from the joint response, that North Dorset District Council are clearly still not fully satisfied that detailed assessment of the policies contained within the plan has been undertaken. The joint response states that *'following discussions with the Town Council the District Council is satisfied that there is unlikely to be significant problems in terms of deliverability'*.

Gladman are concerned that neither the Town Council or the District Council have any evidence to support this and consider that until such evidence is provided to robustly demonstrate the deliverability of allocated sites, the policies contained within the Neighbourhood Plan cannot be

considered to meet basic conditions. We have previously identified that a number of the SNNP's proposed allocations have been in the pipeline for several years, and have still failed to deliver any homes.

It is important to remember that the SEA process must adhere to the legal requirements of SEA Regulations 2004. If there are doubts in respect of compliance (with specific reference to statements such as "*...Ideally detailed assessments should have been undertaken*"), we query whether it is possible to conclude that compliance with the SEA Regulations has been achieved.

Settlement Boundaries

Whilst Gladman's concerns regarding the proposed settlement boundary did not relate specifically to the exclusion of allocations from the defined boundary, we note that within the response provided by the Town and District Councils regarding the issue, there continues to be some apparent discord between both parties preference, with it being clear that the District Council would prefer a standard approach to be adopted. We suggest that an approach that is consistent with national policy and guidance and strategic policies should be adopted within a neighbourhood plan. As such, we are concerned that the Examiner's question has not been addressed sufficiently within this response.

Gladman remain concerned that the plan in its current form does not comply with basic conditions (a), (d) and (f). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development. We further query whether it is compatible with EU obligations.

Given the issues considered in the joint response to the Examiners Questions, Gladman suggest that it may be appropriate for the Examiner to hold a hearing session(s) where all concerned parties can discuss unresolved concerns. We formally request to participate at the hearing session(s) should the Examiner decide it necessary to discuss these issues in a public forum.

Should you have any further questions regarding our response, please do not hesitate to contact me or a member of the Gladman team.

Kind Regards,

Megan Pashley
Senior Policy Researcher

