



BIDWELLS

Your ref: Arne NP
Our ref: 44864
DD: [REDACTED]
E: [REDACTED]
Date: 25/09/19

Planning Policy Team
Westport House
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Dorset
BH20 4PP

By email: planningpolicyteame@dorsetcouncil.gov.uk

Dear Sir/Madam,

ARNE NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION RESPONSE

We write on behalf of our clients Bellway Homes and A & F Baggs with comments on the submitted Arne Neighbourhood Plan. For background, Bellway Homes and A & 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 neighborhood 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 neighborhood plan is tested. For example, [up-to-date housing need evidence](#) is relevant to the question of whether a housing supply policy in a neighborhood 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.

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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 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.

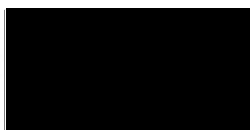
In addition, there will be implications for Arne of Wareham effectively not taking it's 'fair share' of growth in the emerging Local Plan. The Local Plan directs growth away from Wareham to the west of the District

(an approach currently being debated at the Local plan examination) which will have implications for those who want to live in the Wareham area, but who can't find a home. Settlements in Arne, near to Wareham, will therefore inevitably be one of the first locations these people will look, which will drive up the housing need in the area.

Whilst the level of increase in the housing target would not be sufficient to justify the allocation of land West of Wareham, to be made sustainable, the housing target needs to increase from the 4/5 currently proposed to ensure the Plan delivers sustainable development and to ensure that the requirement to reflect national guidance on the use of emerging evidence is satisfied.

I hope that these comments are helpful. If any points require clarification, please do not hesitate to contact me.

Yours sincerely



Mark Harris, MRTPI
Associate