



## Regulation 16 publication of Arne Neighbourhood Plan 2019

The Arne Neighbourhood Plan has been submitted to Dorset Council for examination. The neighbourhood plan and all supporting documentation can be viewed at Dorset Council, Westport House, Worgret Road, Wareham, BH20 4PP and on Dorset Council's website: [www.dorsetcouncil.gov.uk/arne-neighbourhood-plan](http://www.dorsetcouncil.gov.uk/arne-neighbourhood-plan).

This is your final opportunity to make comments on the plan before it is submitted for examination.

### Please return completed forms to:

Email: [planningpolicyteame@dorsetcouncil.gov.uk](mailto:planningpolicyteame@dorsetcouncil.gov.uk)

Post: Planning Policy, Westport House, Worgret Road, Wareham, BH20 4PP

**Deadline: 4pm on Friday 4 October.** Representations received after this date will not be accepted.

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Arne Parish Council have submitted the final draft of their Neighbourhood Plan to Dorset Council. The Council is publicising the Neighbourhood Plan for six weeks from Friday 23 August to Friday 4 October in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, so that interested parties have the opportunity of making a response on the plan.

After this the plan, its supporting evidence and any comments received during the consultation will be submitted to an independent examiner.

This is an important stage as it is the last opportunity for you to make comments on the plan before it is examined. Before responding, we recommend reading the plan paying particular attention to the policies and the supporting evidence base.

### Please note:

- By submitting this response form you consent to your response and your name being published on the Council's website. We will not publish signatures and contact details (such as street addresses and phone numbers).
- All respondents must provide their name and address and/or email address.
- You can comment online <https://www.snapsurveys.com/wh/s.asp?k=156112657679> or by obtaining a paper form from Dorset Council, Westport House, Worgret Road, Wareham, BH20 4PP / 01929 556561.
- These representations cannot be treated as confidential. By completing a representation, you agree to your name and comments being made available for public viewing. They will be displayed on the website prior to and during examination.
- Information on the Council's privacy policy is available on our website at <https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-privacy-notice.aspx>
- The Council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.

Please complete both sections 1 and 2 below for your comments to be taken into account.

### Section 1: Personal details

	Your contact details	Agent's Details (if applicable)
*Name	Simon Jenvey	Alex Cave
Organisation / Group (if applicable)	Halsall Homes	Origin3
*Address line 1		██████████
Address line 2		
*Town / City		████
County		
*Post Code		██████
*1E-mail address	████████████████████	████████████████████
Please tick this box if you'd like to be notified of the results of the referendum.		<input checked="" type="checkbox"/>

\* Fields are required \*1 Field is preferred

### Section 2: Comment on the plan

When the Neighbourhood plan is submitted for examination, the examiner will assess whether it meets a number of basic conditions. These are:

- i. does the plan have regard National Planning Policy Framework<sup>1</sup>;
- ii. is the plan in general conformity with the Purbeck Local Plan Part One<sup>2</sup>, and minerals/waste plans for Dorset;
- iii. does the plan contribute to the achievement of sustainable development;
- iv. does the plan preserve or enhance Conservation Areas<sup>3</sup>;
- v. does the plan preserve listed buildings, their setting or any features of special architectural/historic interest;
- vi. does the plan breach, and is it otherwise compatible with, EU obligations; and
- vii. does the plan meet prescribed conditions related to the plan and prescribed matters complied with in connection with the proposal for the Neighbourhood Plan.

<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

<sup>2</sup> <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/adopted-local-plan-purbeck/pdfs/alp/purbeck-local-plan-part-1-planning-purbecks-future.pdf>

<sup>3</sup> <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning/planning-constraints/conservation-areas/purbeck/conservation-areas-purbeck.aspx>

With this in mind, please use this section to make any comments on the plan

1. Please use the box below to make your response, explaining whether you think the plan does, or does not meet, the basic conditions.

See attached Representations.

2. Please give details of any suggested changes that may help the plan to meet some, or all of, the basic conditions in the box below.

See attached Representations.

**Please sign and date this form:**

Signature: Alex Cave Date: 4-10-2019

Origin3 Ref. 14-047

Dorset Council  
Planning Policy  
Westport House  
Worgret Road  
Wareham  
BH20 4PP

4 October 2019

Dear Sir/Madam,

**Arne Neighbourhood Plan (2018-2034) Public Consultation – Regulation 16**

We write to provide Representations to the above consultation.

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.

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).

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:

- The Basic Conditions
- Response to the draft policies
- Land at Steppingstones
- Summary and conclusions

## 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:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- 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,
- 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,
- d) The making of the order contributes to the achievement of sustainable development,
- 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),
- f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and (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.

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:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

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 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).

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)

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)).

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:

“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)

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)

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.

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.

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, 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.

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.

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).

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 recognised needs.

### **Response to the draft Policies**

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.

#### **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.”*

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.

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. 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.

#### **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.



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.

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). 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".

Comment on criteria pursuant to Policy 4 is set out below.

- *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 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.

- *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.

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).

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.

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.

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).

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. 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. 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.

- *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'*

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. 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 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.

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.

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. 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.

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.

### **Land at Steppingstones**

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 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.

### **Summary and Conclusion**

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.

Yours sincerely,



Alexander Cave  
**Planner**

T: [REDACTED]

E: [REDACTED]



proj: 14-047 drg: 201 date: 12/12/2018 rev: A



## Steppingstones, Stoborough Application Boundary

Halsall Homes Ltd

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Sketch proposals are for illustrative purposes only & as such are subject to detailed site investigation including ground conditions/contaminants, drainage, design & planning/density negotiations. Sketch proposals may be based upon enlargements of OS sheets & visual estimations of existing site features, accuracy will therefore need to be verified by survey.

1:500 @ A1 / 1:1000 @ A3

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W:\PLANNING\14-047 Steppingstones Fields, Stoborough\Urban Design\3 Drawings & Images\2 Drawings in Progress\CAD\14047-201A\_Application Boundary.dwg

Project: Steppingstones Fields, Stoborough  
 Client: Halsall Homes  
 Event: DAS Consultation Meeting  
 Time/date: 1.30pm, 14 February, 2018  
 Location: Forest Office, Cold Harbour

Attendees:

- Nick Squirrell (NS) – Natural England
- Simon Jenvey (SJ) – Halsall Homes
- Matt Jones (MJ) – EAD Ecology
- Dan Trundle (DT) – Origin 3

Minutes	Action
<b>Aim</b>	
The purpose of the meeting was to confirm the scope of the assessment of effects of the proposed residential development at Stoborough on European-designated sites and agree the appropriate mitigation strategy. SJ and DT confirmed that the proposed development would be up to 40 units. MJ tabled a draft layout showing a development of 35 units.	
<b>Planning background</b>	
DT provided an overview of the planning background to the site, including identification within the SHLAA and relevance of the recent Purbeck District Small Sites Planning Policy. Pre-application consultation with Purbeck District Council was started in 2017. Further consultation is now being undertaken with statutory and non-statutory consultees. Consultation with the Parish Council, previously undertaken in 2016, will also be continued.	
<b>Scope</b>	
The location of the European-designated sites in relation to the proposed development site was reviewed; MJ tabled the Sites Plan issued with the DAS request. Whilst a number of European-designated sites occur, NS confirmed that it was only the following that need to be included in the assessment of effects of the proposed development: <ul style="list-style-type: none"> <li>• Dorset Heaths (Purbeck &amp; Wareham) &amp; Studland Dunes Special Area of Conservation (SAC).</li> <li>• Dorset Heathlands Special Protection Area (SPA) and Ramsar.</li> <li>• Poole Harbour SPA &amp; Ramsar.</li> </ul>	
MJ and NS agreed that the principle issues to be addressed through the assessment related to the following: <ul style="list-style-type: none"> <li>• Effects of urbanisation and recreation.</li> <li>• Effects of nutrient enrichment.</li> <li>• Effects of air quality.</li> </ul>	
<b>Recreation and urbanisation</b>	
MJ confirmed that the southern part of the proposed development site was approximately 360 m from the Dorset Heaths/Heathlands SAC/SPA/Ramsar. However, MJ confirmed that development would be set back from the southern boundary to ensure that no residential built-form occurred within 400m. This was currently shown on the draft layout and would accord with the mitigation strategy for urbanisation (including cat predation), as set out in the Dorset Heathlands Planning Framework 2015-2020 SPD.	
NS confirmed that effects of recreation had to be considered on both the Heathland and Poole Harbour European-designated sites. NS confirmed that a SPD will shortly be coming forward for	

Minutes	Action
recreation effects on Poole Harbour. Mitigation will be funded through a contribution to Strategic Access Management and Monitoring (SAMM) for Poole Harbour; this would be collected through CIL.	
<p>Discussion took place regarding mitigation of recreation effects on the Heathland sites. NS confirmed that the strategy should be as follows:</p> <ul style="list-style-type: none"> <li>• Provision and/or contribution to Heathland Infrastructure Project(s) (HIPS), potentially including Suitable Alternative Natural Greenspace (SANG)</li> <li>• Contribution to Strategic Access Management and Monitoring (SAMM) within the heathlands.</li> </ul> <p>This was as set out in the Dorset Heathlands Planning Framework 2015-2020 SPD.</p>	
NS confirmed that as long as the proposed development was below 40 residential units, mitigation could be delivered through a financial contribution to HIPs and SAMM, which would be delivered through CIL. If the development proposed 40 units or above, it would be necessary to either provide a bespoke SANG or link to an existing SANG e.g. Holme Lane/Bog Lane SANG (approximately 260m to the west of the proposed development site).	
NS provided a plan of the Holme Lane/Bog lane SANG (13.98ha). NS confirmed that existing capacity currently occurred within this SANG and that it was his understanding that no other developments, other than the Bloor Homes development (153 units) at Worgret Road, Wareham, had been 'linked' to this SANG. This development has been built out.	
MJ and NS agreed that to calculate SANG capacity at Holme Lane/Bog lane SANG, the formula of 16ha per 1000 residents at a unit occupancy of 2.42 people per unit should be used.	
NS confirmed that Holme Lane/Bog lane SANG was owned and managed by the Scott Estate. There is a requirement on the Estate to manage the SANG for 80 years. NS confirmed that Savills was acting on behalf of the Estate in relation to the SANG. MJ confirmed that if capacity was sought for this SANG, it would have to be achieved through a private agreement between Halsall Homes and the Scott Estate, which could then be submitted with the planning application to confirm delivery of SANG mitigation.	
NS stated that if the proposed residential development was linked to Holme Lane/Bog lane SANG, further SANG enhancements would be required. MJ disagreed on the basis that if sufficient capacity occurred, it was reasonable to link the development to the SANG without any enhancement. Nonetheless, enhancements were discussed, including potentially increasing the size of the existing car park.	
In summary, NS confirmed that if the 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). It is only if 40 or more units are proposed that delivering or linking to a bespoke SANG would be required, in addition to the contributions to Heathland SAMM and Poole Harbour SAMM.	
<b>Nutrient assessment</b>	
NS provided background to the nutrient neutrality assessment, including reference to the 'Nitrogen Reduction in Poole Harbour SPD'. NS confirmed that a nutrient assessment was required and that he would provide example calculations for a 35-unit and 40-unit scheme as part of this DAS consultation. DT confirmed approximate development and POS areas on the draft layout. If the development was found to lead to a gain in nutrients, NS confirmed that this could be mitigated either on-site (e.g. through provision of additional POS or habitat creation) or delivered off-site e.g. through a land-use change from nutrient addition to nutrient neutral; the latter could be achieved through a payment to Purbeck District Council (via a s106 Agreement).	NS
<b>Air quality</b>	
MJ referenced the current situation regarding air quality effects on Ashdown Forest SAC/SPA from increased traffic from new development coming forward. MJ asked NS how new development around the Heathland European-designated sites was being assessed in Dorset. NS confirmed that as long as	MJ (to review with



Minutes	Action
<p>a proposed development could demonstrate &lt;1000 AADT on the highway network within/adjacent to the Heathland site(s), the effect of air quality could be screened out and no further assessment was required.</p>	<p>project transport consultant)</p>
<p>Other matters</p>	
<p>NS confirmed to SJ/DT that consultation with the local AONB Officer should be undertaken regarding the site. DT confirmed that this was being undertaken. NS stated that if the local AONB Officer was satisfied with the proposals and did not object, Natural England would be satisfied and would also not object on AONB grounds.</p>	
<p>Post-meeting note</p>	
<p>NS requested the inclusion of the following note in the minutes (sent by email to MJ on 15/2/2018):</p> <p>The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.</p>	