



Hall & Woodhouse Ltd c/o Southern Planning Practice (Lynne Evans)

ID No 748

ISSUE 2: Questions 2.5 and 2.6: Status of IOWAs and local green space

One of the Core Principles of the National Planning Policy Framework is that Plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.

There is ambiguity and confusion on the various terms used in LP1 relating to open areas/green space and as a result the Plan is not consistent with national guidance.

Important Open and Wooded Areas are set out under Policy 1.9 of the existing Local Plan. However, the Inspector at the previous Local Plan made it clear that the approach required comprehensive revision as there was confusion and ambiguity with the policy and its objectives. It is understood that this exercise has never been undertaken.

It is noted that in the Council's Submission Plan (SUD017a and 17b) paragraph 7.134 referring to IOWAs has been deleted but the Schedule of Policies to be Retained indicates that the existing Policy 1.9 and the designations under that Plan are to be retained and reviewed either in LP2 or neighbourhood plans.

Whilst this is not the opportunity to review specific sites under these designations, by way of example reference is made to the IOWA within the settlement boundary of Sturminster Newton adjoining the Bull Tavern. Policy 1.9 indicates that the most important criterion is the overall contribution that the IOWA gives in visual or amenity terms to public areas within the town or village. The public perception of this IOWA is primarily limited to the periphery of the site, and particularly from the road. Appendix 1 and 2 to this statement show the IOWA and the analysis that has been undertaken by Morgan Carey Architects on behalf of Hall & Woodhouse Ltd. If the comprehensive revision called for by the Inspector to the 2003 Plan had been undertaken, it is questioned whether this site, or at least of all of this site would be retained as an IOWA.

Local Green Space is referenced in supporting text in LP1 but not in any policy. Is it intended to accord with the reference to Local Green Space designations at paragraphs 76 and 77 of the Framework? – it is not at all clear.

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There is a real concern that the existing IOWA designations may simply be carried forward and a proper and open review of the status of these designations, which it is understood amounts to several hundred, will not be properly undertaken and subject to full consultation and debate against a credible evidence base.

This cannot be the correct approach as Paragraph 77 of the Framework makes it very clear that the Local Green Space designation will not be appropriate for most green areas or open space and sets very specific criteria for such designations.

Clearly the IOWAs given their vast number cannot be equated with Local Green Space. There is however a danger that is exactly what will happen.

It is argued that it would be more sound for the existing Policy 1.9 and associated designations to be deleted at this stage and for LP1 to set out clear strategic policy guidance either under Policy 4 or Policy 15 to address how LP2 or Neighbourhood Plans should consider local green space, following the guidance in Paragraph 77 of the Framework. The IOWA designation is out of date and should therefore be deleted. Future plans should reassess the designation of land for development or otherwise, with some limited opportunities appropriate for designation of local green space against the policies of LP1 including Policy 4.

LJE/SPP/18 February 2015

Appendix 1 – Plan 13154.04P1

Appendix 2 – Plan 13154.05P1

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