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**Date:** 30<sup>th</sup> September 2019

**Ref:** Arne Neighbourhood Plan

**Officer:** Steve Boyt



Dear Sir/Madam

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 23<sup>rd</sup> August 2019, and the Council must receive any responses by Friday 4<sup>th</sup> 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 7<sup>th</sup> December 2018 and 25<sup>th</sup> 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:

Policy	Council response
Policy 1: House Types	<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.'</p> <p>Dorset Council has a housing allocations policy (including a local connection qualification requirement) for affordable</p>

	<p>homes. The requirements of the Policy 1 (in respect to planning conditions/obligations to ensure allocation to people with a local connection 'first'), and supporting text Paragraphs 8.1.3 and 8.1.4, are not consistent with this housing allocations policy.</p>
Policy 2: Local Character	No comment.
Policy 3: Sustainable Design	No comment.
Policy 4: Small Sites	<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.</p> <p>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>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>
Policy 5: Infill Development	No comment.
Policy 6: Sheltered Housing	<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.</p> <p>The clause of the policy which limits the occupation of the sheltered/care based housing does not appear to be justified.</p> <p>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>

Policy 7: Management of Ecological Sites	No comment.
Policy 8: Stoborough Primary School	No comment.
Policy 9: Community Facilities	No comment.
Policy 10: Key Pedestrian Routes	No comment.
Policy 11: Tourism	No comment.
Policy 12: Local Green Spaces	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).

### Other comments

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) may not be viable for developers or practicable to run for social housing providers.

### Emerging Purbeck Local Plan

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 22<sup>nd</sup> October and 3<sup>rd</sup> December 2018. The emerging Purbeck Local Plan was submitted for examination on 28<sup>th</sup> 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:

- local housing requirement (Policy H1);
- housing land supply (Policy H2);
- permitting small numbers of homes around existing settlements (Policy H8);
- house type and mix (Policy H9);
- design standards for new homes (Policy H10);
- affordable housing (Policy H11); and
- 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:

- clarify those policies which are strategic and non-strategic (see SD 91 (<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/examination-documents-submitted-during-hearings/sd91-council-response-to-actions-8-9-and-10-final.pdf> ));
- avoid conflict between policies in the emerging local plan and made/emerging neighbourhood plans, including:
  - i. policies: H8 (small sites next to existing settlements), H9 (housing mix), H10 (part M of the Building Regulations) and H11 (affordable housing); and
  - ii. 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).

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: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/local-plan-review-purbeck.aspx> ).

Yours sincerely

Steve Boyt  
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Dorset Council