

INDEPENDENT EXAMINATION OF THE ARNE PARISH NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc (Econ) MSc MRTPI

Mrs Amanda Crocker
Clerk to Arne Parish Council

cc: Steve Boyt
Dorset Council

Examination Ref: 02/JK/APNP

13 November 2019

Dear Mrs Crocker

ARNE PARISH NEIGHBOURHOOD PLAN EXAMINATION

After reading the Arne Parish Neighbourhood Plan (NP) and its supporting evidence including the responses to the Regulation 16 consultation exercise, I have identified a number of matters for the Parish Council to consider. The Parish Council may wish to consult Dorset Council and other organisations before sending me its responses to the points raised below. Further information will greatly assist me in carrying out the examination, and reaching conclusions as to whether the submitted NP meets the Basic Conditions. At this stage, it seems to me that some modifications to the NP will be needed for it to satisfy the statutory requirements.

Section 6 of the NP covers Housing Background, explaining that there has been wide consultation with local residents to help determine local housing policy. The supporting evidence for the NP includes the Housing Need Assessment – Arne, Purbeck, prepared in July 2017 and updated in January 2019. Policy 1: House Types and Policy 4: Small Sites in the NP seek to provide for new housing development within Arne. I consider, however, that the NP policies as drafted will not satisfy the Basic Conditions for neighbourhood planning, and that there are some inconsistencies between Policies 1 and 4. Some similar arguments have also been raised in the consultation responses of interested parties. My concerns and questions are as follows:

1. Paragraphs 59 and 60 of the National Planning Policy Framework (NPPF) July 2018, with amendments in February 2019, refer to the Government's objective of significantly boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed. Strategic policies should be designed to determine "*the minimum number of homes needed*". I am aware that neither the adopted Purbeck Local Plan nor the emerging Local Plan set a target for future new housing development in the NP area. However, the Housing Needs Assessment refers to the local authority's 2019 Strategic Housing Market Assessment (SHMA) update based on the Government's standard methodology, using 2014-based housing projections. This methodology, with no adjustment to the Local Plan spatial strategy, indicates that a target of 4-5 dwellings per annum would be appropriate for Arne. The Neighbourhood Plan applies to the period 2018-34 (16 years), which would indicate that some 64-80 dwellings are required to meet current and future housing needs. A survey in 2014 indicated that 17 households with local connections met the District Council's criteria for affordable housing and were in need. A further review in 2016 indicated that the level of demand for such housing had increased. The Housing Needs Assessment states that past delivery rates have been low at 2 dwellings per annum, and evidence from consultees suggests that no affordable housing has been built in Arne since 1992. In view of these circumstances, I am unclear as to the basis for the conclusion in the Housing Needs Assessment that 3-4 dwellings per annum (rather than 4-5) should be the

future target. I suggest that Arne should aim to provide a minimum of 64 new dwellings over the Plan period (4 dwellings per annum on average). This could usefully be stated in the Neighbourhood Plan.

2. Notwithstanding the major environmental and physical constraints on development in the Parish, I consider that the restrictive wording in Policy 4 limiting future housing development to sites of no more than 6 dwellings with fewer than 30 dwelling over the Plan period, has insufficient regard for national planning policy and would not contribute to sustainable development. No evidential data, other than discussions with Natural England, has been submitted to explain why 6 dwellings is set as a limit. The emerging Local Plan's Policy H8: Small sites next to existing settlements, aims to set standards for the scale of new development adjoining villages. The latest version of this policy proposes up to 15 homes on small sites adjoining local service villages and 5 homes on other villages with a settlement boundary. The Parish Council should consider the advice in Planning Practice Guidance (PPG) Reference ID: 41-009-20190509, which states that although a draft neighbourhood plan 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 neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. With this in mind, the Parish Council should consider the relationship between this policy and the emerging Local Plan Policy H8 . I request that the Parish Council gives some consideration to how Policy 4 might be revised to adopt a more positive approach towards new housing development in appropriate locations, and to encourage small-scale development pertinent to each site's characteristics.
3. Regarding the mix of new housing to be provided, sections 6 and 8 of the NP set out a strong case for providing more affordable housing and smaller homes with one or 2 bedrooms in the future. However, the matter of economic viability especially in delivering affordable housing also needs to be considered. Paragraph 63 of the NPPF indicates that major developments (ie. 10 or more dwellings or sites of 0.5has or more) are most likely to deliver affordable housing. If housebuilding were restricted to sites of 6 dwellings, with no more than 20 dwellings built over the first 5 years, I consider that this could hold back the provision of affordable and small homes. The Parish Council should consider how Policies 1 and 4 might be revised to limit the inconsistencies, and acknowledge that to "*mainly include affordable housing*" on small sites could prohibit development.
4. Section 8 of the NP describes the concept of affordable housing which should have regard for national policy and be in general conformity with the (strategic policies of the) Local Plan for the area. Dorset Council expressed concern that Policy 1 and the supporting text in 8.1.3.and 8.1.4 did not set out eligibility criteria consistent with its housing allocations policy. I also note that the NPPF Glossary states that affordable housing includes "*housing that provides a subsidised route to home ownership and/or is for essential local workers*". Paragraph 173 of the emerging Purbeck Local Plan sets out eligibility for affordable homes on rural exception sites, and includes people "*employed in the parish*" as well as those living there or with family connections. I consider that the Arne NP should address the matter of consistency with Dorset Council's allocations' policy and should refer to eligibility for essential local workers, in the interest of supporting local businesses/encouraging sustainable development.
5. Dorset Council's Regulation 16 response included comments on the NP's policies for second homes, sheltered homes and Local Green Spaces. It would assist my examination if the Parish Council could respond to these comments.

6. Map 1 of the NP aims to show “*darker green to North-West Green Belt*”. The Strategic Environmental Assessment document, Appendix 3, shows a different area as “Green belt”. Paragraph 7.4 of the NP also refers to “green belt”. I consider that the NP and Map 1 should set out with greater clarity the extent of Green Belt land in the parish, and confirm that it forms part of the designated South-East Dorset Green Belt (if that is the case).

I appreciate that the Parish Council will need to undertake additional work to respond to these requests for additional information and to put forward some proposed revisions to the submitted NP. My intention is to provide an opportunity to inform any Examiner modifications that I may need to recommend in order for the Arne Parish Neighbourhood Plan to meet the Basic Conditions and other legal requirements. I look forward to hearing as soon as possible when your response will be forthcoming.

In the interests of transparency, may I prevail upon you to ensure a copy of this letter is placed on the Parish Council and Local Authority’s websites.

Thank you in advance for your assistance.

Your sincerely

Jill Kingaby

Examiner