

INDEPENDENT EXAMINATION OF THE PUDDLETOWN NEIGHBOURHOOD PLAN

EXAMINER: Andrew Mead BSc (Hons) MRTPI MIQ

Anna Bendall
Clerk to Puddletown Parish Council

Joanne Langrish Merritt
Dorset Council

Examination Ref: 02/AM/PNP

23 September 2020

Dear Ms Bendall and Ms Langrish Merritt

PUDDLETOWN NEIGHBOURHOOD PLAN EXAMINATION

Having carried out my visit to the Puddletown Neighbourhood Plan (PNP) Area, I have identified some matters on which clarification from the Puddletown Parish Council (PPC) and Dorset Council would assist me in my examination of the PNP. May I request the submission of responses to my questions below **within two weeks** of the date of this letter, although an earlier response would be most welcome.

European Sites

Question to Dorset Council

1. The Puddletown Neighbourhood Plan HRA Screening Report (September 2018) identified potential impacts upon the Poole Harbour and Dorset Heaths/Heathlands European sites. Therefore, it was recommended that an Appropriate Assessment (AA) was completed. The Regulation 16 consultation response from Natural England (NE) dated 6 August 2020 states that Dorset Council has completed an AA, although the phrase immediately preceding the bullet points in the NE representation and some of the content of the bullet points imply that the AA is not yet complete. I would be grateful for a link to the AA and a link to the April 2020 consultation response of NE referred to by Dorset Council.

I note that the helpful email of 9 September 2020 from Dorset Council commented that the PPC are working with NE and Dorset Council to produce a Statement of Common Ground (SOCG) in response to issues raised as part of the regulation 16 consultation and that it would be likely to take around a month for the SOCG to be finalised. I look forward to receiving a copy.

However, in the meantime, I would be grateful for views on the following observations. The catchment of Poole Harbour is shown on Figure 4.2 (page 15) of the HRA Screening Report September 2018. The catchment includes Dorchester, Wareham as well as significant areas of Poole and it seems to me that a policy applying to development throughout the catchment area would be strategic and, if in the relevant Local Plan, one to which the PNP should generally conform. Indeed, Policy ENV2 of the West Dorset, Weymouth and Portland Local Plan 2015 which covers the PNP area considers the effects of development on the

European sites in Poole Harbour. Similar considerations could apply to the Dorset Heathlands.

Therefore, I would be grateful for comments from Dorset Council on whether Policy 7 is more appropriate for the Dorset Council Local Plan and not the PNP.

Defined Development Boundary (DDB)

Questions to PPC

2. Please could the land with planning permission for residential development at Lanes End be shown on Map 7 showing Land Uses and the DDB?

Puddletown Area Parish Council (PAPC) comment: The map could be amended to include an annotation referring to the approved planning application (which has begun to be pegged out). In response to Dorset Council's request, the PAPC did not consider it necessary to have a site-specific policy allocating this land, given the advanced stage it has reached. The PAPC is content that the defined development boundary and generic Neighbourhood Plan policies are sufficient to guide any further planning decisions on this site in the unlikely scenario that a new planning application is received.

3. Please could a map be supplied showing the current DDB, extended by any adjacent planning permissions for built development?

PAPC comment: See attached map (see end) with explanatory annotations.

4. The Regulation 16 consultation response from Battens (Solicitors) concerns land at The Coombe House, Whitehill. Please could the PPC comment on why the land has been excluded from the DDB?

PAPC comment: The landowner did not put this site forward for consideration as a development plot as part of the call for sites. We also had no response from the landowner or their agent to the pre-submission consultation to suggest that they would raise an objection (although they were aware of the Neighbourhood Plan and the potential that their site was being considered for inclusion as a Local Green Space as we consulted them on this matter as recorded in the LGS assessment spreadsheet). However, as explained on pg. 13 of the consultation statement, the undeveloped nature of the garden area is considered to be beneficial in helping reinforce the rural setting of the wooded part of the Coombe. Given that sufficient sites to meet the projected housing need were identified, the value of this site (in terms of the setting of the Coombe) was deemed to outweigh the benefits of retaining it within the DDB as a potential open market housing infill plot. However, as it is not included in the LGS designation it could come forward for affordable housing (as a rural exception site) - where the additional benefits of providing an affordable home may be considered to outweigh the harm. Furthermore, as it is not part of the LGS it could also be considered as an allocation through a future review of the plan, when more housing sites may be needed.

Housing

5. Dorset Council has recommended removing the reference to Northbrook Farm as a reserve housing site and showing it as an allocation. Does the PPC have any views on this?

PAPC comment: This point is addressed on pg. 42 of the consultation statement which states "The NPPG (para ref ID: 41-009-20190509) makes clear that 'Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.' The policy makes clear the circumstances under which the site may be released early, and it is hoped that the LPA would adhere to this as it would be part of the development plan".

The site legitimately falls within the reserve category in that extant planning applications and allocation of the Athelhampton Road site will more than meet the housing target (please refer to the indicative housing figure in the supporting evidence as supplied by Dorset Council, and section 4.1 of the submission plan). To encourage more development in advance of the point at which this plan would be reviewed would create a significant over-supply at this point in time and does not reflect the need or the wishes of local residents.

PAPC fail to see why Dorset Council consider that it is difficult to enforce a site as a 'reserve site' as this would imply that there is no such thing (when clearly the Government does support such a concept). It is accepted that there may be circumstances where it would be difficult to enforce, and it is for these reasons that the policy makes clear that an early release would be appropriate should there be evidence that there are specific local needs for housing that would not otherwise be met that would justify its more immediate release.

Furthermore, the PAPC would point out that there is at least one other Neighbourhood Plan within the Dorset Council area that includes a reserve site. The Pimperne Neighbourhood Plan (made January 2019 – <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pimperne-neighbourhood-plan.aspx>) Policy HSA3 starts as follows:

Policy HSA3: Housing Site Allocation 3 – land west of Old Bakery Close

- a) Land west of Old Bakery Close, as shown on Map 5, is allocated for up to 15 dwellings that will provide a mix of housing (including provision for affordable housing) following on from the National and Local Plan requirements*
- b) The development should be phased as a reserve site for delivery for the period beyond 2026.*

The Examiner raised no concerns about this and noted in his report that "The expected phasing of HSA3 as a reserve site is considered to provide a degree of flexibility to the plan to meet local housing needs over the plan period." and this reflected the comments of the planning authority (then North Dorset District Council).

NB please note that the other points raised by Dorset Council regarding employment is addressed in the consultation statement (it may be that Dorset Council overlooked this response altogether in making their Reg 16 comments). This also applies to a number of other comments made by Dorset Council at Reg 16, and we would hope that the Examiner similarly reads our Reg 14 responses to those.

Locally Important Buildings

Question to Dorset Council

6. What is the evidence to justify adding No.16 Mill Street, Northbrook Farm/Orchard Cottage and 5-6 Northbrook to Table 3 Locally Important Buildings?

Question to PPC

7. Does the PPC have any views about adding those buildings to the list?

PAPC comment: No 16 is shown in the Plan but there is a typographical error in Table 3 (which lists 6 Mill Street in error). The properties at Northbrook are a new suggestion made by Dorset Council that were not suggested at the Reg 14 stage. PAPC would support the Examiner's consideration of their inclusion.

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

Thank you in advance for your assistance.

Your sincerely

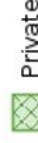
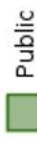
Andy Mead

Examiner

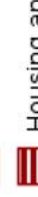
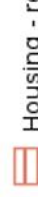
Defined Development Boundary



Local Green Space



Site Allocation



DDB changes from adopted plan



Parish



Puddletown CP

Author:

Date: 26/09/2020

