



**NEWARK & SHERWOOD ALLOCATIONS &
DEVELOPMENT MANAGEMENT DPD**

**MATTER 7 – STRATEGIC POLICIES FOR THE
PURPOSES OF NEIGHBOURHOOD PLANNING**

(Issue 33 to 35)

**Statement on behalf of Newark & Sherwood
District Council**

November 2012

Issue 33: Are the criteria correct for the identification of strategic policies? Should other policies, such as So/Ho/4, So/PV, So/Wh be included as strategic policies?

- 33.1 It is considered that the criteria used are robust and that their application has allowed for a sound approach to identifying the elements of the Plan which are considered to be strategic. It is not considered necessary or appropriate for other policies, such as So/Ho/4, So/PV and So/Wh which have not been identified as strategic to be reclassified as such.
- 33.2 The Strategic Policies for the Purposes of Neighbourhood Planning Consultation Document sets out the approach followed in identifying strategic policies. This process was built around the following criteria:
- Selection of those policies of the Plan which cover the whole District. The DPD includes a suite of Development Management policies which will provide for the consideration of development proposals. In order to provide consistent decision making across the District it was considered necessary for such policies to be regarded as strategic.
 - It was also viewed as important that those policies allocating land which will provide for a significant proportion, or all, of the future development requirements in that location be identified as strategic. The thresholds applied for Newark and the remainder of the District are considered to reflect the strategic importance of the sites in delivering the spatial strategy, as set through the Core Strategy. Given the significance of these sites, at the settlement-level, it is viewed that without the allocation it is questionable whether the level of growth identified for the settlement could be delivered. In addition a number of the sites identified as strategic have been allocated in order to help meet specific local need or to aid regeneration. As a result these sites are viewed as crucial to the realising of the strategy for these locations.
 - Policies allocating land which requires a change in the Green Belt boundaries. Through the implementation of Spatial Policy 4A (SP4A) of the Core Strategy a small-scale review of Green Belt boundaries around Lowdham, Rainworth and Blidworth has been undertaken. This review has resulted in changes to the Green Belt boundary in order to accommodate housing allocations. The extent of the Green Belt is defined by SP4A so whilst the amendments have been minor in nature the act of allocation amends a strategic policy (SP4A) and so it is considered that the allocations are therefore strategic.
- 33.3 Taking account of the above it is considered that the criteria used to identify the strategic elements of the Plan are appropriate.
- 33.4 Comments were received to the Strategic Policies for the Purposes of Neighbourhood Planning Consultation which have argued for the reclassification of So/Ho/4, So/PV and So/Wh as strategic.

- 33.5 The strategic support for policies So/PV 'Southwell Protected Views' and So/Wh 'Thurgarton Hundred Workhouse' is provided by Southwell Area Policy 1 (SoAP1) of the Core strategy (CS) (LDF10). As a result a Neighbourhood Plan would need to be prepared in accordance with SoAP1 and therefore policies So/PV and So/Wh.
- 33.6 The submission made on site So/Ho/4 puts forward the argument that the site has a capacity to deliver 50 dwellings or more and so should, on this basis, be considered as strategic. However as detailed in the District Council response to Matter 5 – Southwell Area - Issue 19, the Plan is based on a robust and sound approach to site selection which has taken account of available evidence and consultation input. This has enabled appropriate and sustainable levels of development to be identified which reflect individual site circumstances. Accordingly it is considered that the identification of around 45 dwellings for So/Ho/4 strikes an appropriate balance between the level of development, the sites gateway location and the mitigation of the impact of the site on the character of Kirklington Road.
- 33.7 Given that the threshold of 50 dwellings appropriately defines a residential site as strategic outside of Newark; that the site has been attributed a suitable and sustainable site capacity estimate beneath this threshold; and that the strategy provides for sufficient flexibility to respond to the non-delivery of a non-strategic site, it is not considered necessary or appropriate for site So/Ho/4 to be reclassified as strategic.

Issue 34: Has the potential of each site to deliver strategic outcomes been fully considered during the preparation of the Allocations & Development Management DPD.

- 34.1 The identification of parts of the Plan as strategic has been undertaken following the advice from the Planning Inspector after the conclusion of the Publication stage of the Development Plan Document (DPD) (ADM2). Whilst the intention for elements of the Plan to be considered as strategic has not been built into the approach from the beginning of the Plans preparation, this is not considered to have had a detrimental impact upon the process that followed.
- 34.2 It is viewed that the methodology and criteria used to identify strategic policies reflects an appropriate and robust approach. Through the 'Strategic Policies for the Purposes of Neighbourhood Planning' Consultation carried out in September 2012 there has also been the opportunity for Consultees and Representors to make comment on the approach to, and outcome of, identification.
- 34.3 The production of the plan has followed a rigorous approach and has been founded on the outcome of Sustainability Appraisal and a proportionate, robust and sound evidence base. Through the Plans preparation, input has been sought from consultees and representors at the Options Report (ADM16) and Additional Sites

consultation stages (ADM10) and during the formal Period of Representation. This has provided the opportunity for stakeholders to comment on the content of the Plan and to present arguments over issues such as site capacity etc. Taking account of the process followed, it is therefore considered that the Plan represents a sound strategy which is the most appropriate approach when considered against all other reasonable alternatives.

- 34.4 As a result, the defining of elements of the Plan as strategic is purely a reflection of the significance of these policies to the overall strategy and is not considered to have inhibited the process of Plan preparation.

Issue 35: Is there a conflict with the NPPF and the Localism Act 2011?

- 35.1 The strategy that underlies the LDF is consistent with the NPPF (ND10) and the Localism Act 2011 (ND7). The NPPF, the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 (NP Regulations) (ND9) provide the Government's approach to planning, and it is considered that the Plan is in conformity with this. NP Regulations are intended to allow communities to produce Plans and Orders in line with LDF Strategic Policies. The definition of Strategic Policies is necessary, therefore, to facilitate Neighbourhood Planning and is in conformity with relevant legislation.
- 35.2 Comments were made in response to the Consultation on Strategic Policies for the Purposes of Neighbourhood Planning that the designation of allocations policies as strategic deprives communities of the power to influence development in their areas. The Council has only sought to identify sites as strategic in those circumstances where they represent a significant level of development in relation to the settlement. In certain cases, the delivery of the Council's Spatial Strategy relies on an individual site in a settlement, and in these circumstances the site is considered strategic. The Council believes that this represents an appropriate approach to identifying strategic sites.
- 35.3 The approach set out above does not prevent Neighbourhood Forums from having an input into the planning process beyond these Strategic Policies, or from guiding the development of any windfall sites.