

## **Report to Dorset Council**

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Inspectors appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

## **Report on the Examination of the Purbeck Local Plan (2018 - 2034)**

The Plan was submitted for examination on 28 January 2019.

The examination hearings were held between 2 July 2019 and 11 October 2019, and on 19 July 2022.

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## Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CCMA	Coastal Change Management Area
CIL	Community Infrastructure Levy
Dpa	Dwellings per annum
DPD	Development Plan Document
DtC	Duty to Co-operate
Framework	National Planning Policy Framework
FMM	Further Main Modification
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IMS	Interim Mitigation Strategy
km	Kilometre
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
MM	Main Modification
MoU	Memorandum of Understanding
PLP1	Purbeck Local Plan Part 1
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SANG	Suitable Alternative Natural Greenspace
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SMM	Supplementary Main Modification
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPF	Strategic Planning Forum
sq. m	Square metres
SSSI	Site of Special Scientific Interest
SuD	Sustainable Drainage System
TCPA	Town and Country Planning Act 1990
UCO	Use Classes Order
WHS	World Heritage Site
WMS	Written Ministerial Statement

## Non-Technical Summary

This report concludes that the Purbeck Local Plan (2018-34) provides an appropriate basis for the planning of that part of Dorset, previously covered by Purbeck District Council, provided that a number of main modifications [MMs], further main modifications [FMMs] and supplementary main modifications [SMMs] are made to it. Dorset Council has specifically requested that we recommend any MMs, FMMs and SMMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a nine-week period. An additional seven-week consultation took place on FMMs and on an updated habitats regulations assessment and sustainability appraisal. A further six-week consultation took place on SMMs and on an updated habitats regulations assessment and sustainability appraisal. In some limited cases, we have amended their detailed wording where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Modifications (MMs, FMMs and SMMs) can be summarised as follows:

- Modifications to the spatial strategy and other policies of the Plan to reflect the finding that there are no exceptional circumstances to justify the release of Green Belt land at Wareham and to clarify that the spatial strategy for development is set within the context of a settlement hierarchy;
- Modifications to reflect changes in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020;
- Modifications to various policies to ensure that the requirements of the Habitats Regulations are reflected;
- Modifications to the housing need and requirement figures to ensure consistency with national policy and guidance and to ensure that the Plan is positively prepared;
- Modifications to Policy H2 to include all the various components of housing land supply and to amend the policy and the housing trajectory to reflect the most up-to-date evidence on the various components of housing supply, including the capacity, deliverability and timing of the allocated housing sites;
- Modifications to Policies H4 and H5 to reflect updated evidence relating to care accommodation in Purbeck;
- Modifications to Policies H4, H5, H6 and H7 to ensure clarity around the requirement to provide suitable alternative natural green space [SANG] to mitigate against the impact of the residential development proposed by the housing allocations in the Plan;
- Modifications to the development requirements set out in the housing allocation policies (H4, H5, H6 and H7) and the housing mix policy (H9) to reflect updated evidence including in relation to viability and the needs of elderly people and people with disabilities, updated national guidance and the implications and the interplay with MMs in relation to other policies;

- Modifications to the requirements in Policy H3 relating to the housing allocations to ensure that they are effective, justified and consistent with national policy;
- Modifications to Policy H8 to ensure it is consistent with the spatial strategy and national policy in relation to the Green Belt and encouraging sustainable patterns of development;
- Modifications to clarify the position in relation to the accommodation needs of gypsies, travellers and travelling showpeople and to make a firm commitment to addressing their needs in the Dorset Council Local Plan;
- Modifications to Policy H14 to clarify the application of the principal residence restriction in relation to replacement homes and commercial holiday lets;
- Modifications to Policy E9 to ensure an effective approach to seeking nutrient neutrality from development proposals.
- Modifications to Policy I5 and its supporting text to clarify that the delivery of a strategic SANG at Morden will be sought independently of a holiday park and to clarify the intended approach to mitigate the impact of residential development in the light of the uncertainty of the delivery of the strategic SANG;
- Modifications to Policy I6 and its supporting text to ensure that it reflects the scope, location and form of development expected to come forward via the proposed allocation at the former Middle School at Worgret Road, Wareham, and;
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. The Purbeck Local Plan (2018-2034) (Purbeck Local Plan) was submitted by Purbeck District Council on 28 January 2019. From 1 April 2019 the Council structures in Dorset changed and Purbeck District Council, along with several other Councils, became part of the unitary authority known as Dorset Council.
2. The Local Government (Structural Changes) (General) (Amendment) Regulations 2018 make provision for Local Plans, covering the same area as, local planning authorities that existed prior to the reorganisation date, in this case 1 April 2019, to continue to come forward until such time as a plan covering the whole unitary authority is adopted.
3. This report contains our assessment of the Purbeck Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate [DtC]. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework [the Framework] indicates that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
4. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Purbeck Local Plan submitted in January 2019 is the basis for our examination. It is the same document as was published for consultation in October 2018.

## Main Modifications

5. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted.
6. Our report explains why the recommended MMs, further main modifications [FMMs] and supplementary main modifications [SMMs], referenced in bold and referred to either in the form **MM**, **FMM** or **SMM**, are necessary. The FMM and SMM names are used to aid the reader, but for the avoidance of doubt they each constitute MMs in line with section 20(7C) of the Act. Where a SMM or FMM supersedes an earlier MM, only the SMM or FMM recommended to achieve legal compliance and/or soundness is referred to in this report. The recommended MMs, FMMs and SMMs are set out in full in the Appendix.
7. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal [SA] and habitats regulations assessment [HRA] of them.

8. The MM schedule was subject to public consultation for nine weeks between November 2020 and January 2021. Following consultation on the MM schedule and considering representations relating to the proposed MMs to Policy V2: Green Belt and its supporting text and policy I5: Morden Park strategic suitable alternative natural green space [SANG] and holiday park and its supporting text, it was considered that the soundness of the Plan required further modifications. Consequently, revisions in proposed FMMs were made to these policies, their supporting text and other references to these policies in other parts of the Plan. An additional seven-week consultation took place between December 2021 and January 2022 on the FMMs, supporting documentation and an updated HRA and SA.
9. Following consideration of the consultation responses to the FMMs consultation, a further hearing session relating to the Plan approach to Morden Park, specifically in terms of the related elements of Policies I5 and V2 and the MMs and FMMs, took place in July 2022. Following those hearings and to address changes in circumstances, including the implications of Natural England guidance published in March 2022 relating to effects of development with respect to nutrient pollution that included the Poole Harbour catchment, further revisions to the related policies of the Plan, their supporting text and other references to these policies in other parts of the Plan were included as proposed SMMs. An additional six-week consultation took place between November 2023 and December 2023 on the SMMs, supporting documentation and further updated HRA and SA. The public consultation on the MMs, FMMs and SMMs were undertaken having regard to government regulations and guidance.
10. We have taken account of the consultation responses received on the proposed MMs, FMMs and SMMs in coming to our conclusions in this report and in the light of this we have made some amendments to their detailed wording where necessary for consistency or clarity. None of the amendments significantly alter the content of the modifications as published for consultation or undermine the participatory processes and the SA and HRA that has been undertaken. Where necessary, we have highlighted these amendments in the report.
11. National Landscapes were re-named on 22 October 2023 and were formerly known as Areas of Outstanding Natural Beauty [AONB]. It follows that we have made consequential minor wording changes to references to AONB in MMs, FMMs and SMMs consulted upon, as reflected in those subsequently recommended in this report. The factual updates to the naming of the designation do not materially affect the implementation of any related policies in the Plan and the purposes of the MMs, FMMs and SMMs consulted upon.

## Policies Map

12. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map sought to take account of a number of proposed changes that the Council was proposing after the consultation on the publication version. However, these were not subject to further consultation before submission. Accordingly, we have considered the set of plans accompanying the publication version of the Plan as the submission policies plans. These comprise the set of plans identified as Policies map (document SD49), Key to maps (document SD50), Inset maps (documents SD01d; Sd01e; SD01f; SD01g; Sd01h; Sd01i; SDo1j and SD01k).
13. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs, FMMs and SMMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are instances where a change to the policies map is either not justified or is necessary to ensure that the relevant policy is effective.
14. These further changes to the policies map were published for consultation alongside the MMs (document MMCD2), FMMs (documents FMMCD5a, FMMCD5b and FMMCD5c) and SMMs (documents SMMCD7a, SMMCD7b, SMMCD7c, SMMCD7d, SMMCD7e, SMMCD7f, SMMCD7g, SMMCD7h, SMMCD7i, SMMCD7j and SMMCD7k).
15. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in Policies map (document SD49), Key to maps (document SD50), Inset maps (documents SD01d; Sd01e; SD01f; SD01g; Sd01h; Sd01i; Sdo1j and SD01k), and the most up-to-date further changes published alongside the MMs (document MMCD2), FMMs (documents FMMCD5a, FMMCD5b and FMMCD5c) and SMMs (documents SMMCD7a, SMMCD7b, SMMCD7c, SMMCD7d, SMMCD7e, SMMCD7f, SMMCD7g, SMMCD7h, SMMCD7i, SMMCD7j and SMMCD7k).



## Context of the Plan

### Geography of the Plan area

16. The Purbeck area is rural in character with the majority (49%) of its population living within the towns of Swanage (as covered separately by the Swanage Local Plan), Wareham and Upton. The larger villages of Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford and Wool provide a range of services and facilities to their communities and accommodate around 26% of the population of the area. The remainder of the population of the area live in several smaller villages and hamlets.
17. The area has a diverse economy. It contains an Enterprise Zone – Dorset Innovation Park at Winfrith, an advanced engineering cluster of excellence for the South West of England building on strengths in the marine, defence and energy sectors. Tourism related employment is significant, totalling around 21% of the workforce, whilst manufacturing employment accounts for around 14% of the workforce. Agriculture, horticulture and local food production also make an important economic contribution. Average house prices in the area are high and average salaries are comparatively low.
18. The designated Dorset National Landscape covers around half of the Purbeck area. Almost a quarter of the Purbeck area is also covered by national and international nature conservation designations. These include Sites of Special Scientific Interest [SSSIs], Special Protection Areas [SPAs], Special Areas of Conservation [SACs] and Ramsar sites. Purbeck's coast forms part of the Dorset and East Devon Coast World Heritage Site [WHS]. In addition, the rivers Frome and Piddle which discharge into Poole Harbour cross the Plan area, and land around these rivers, as well as other land in the Plan area, is at risk from flooding.
19. The Purbeck area covered by the Plan has over 250 scheduled ancient monuments, 1400 listed buildings, 25 conservation areas and 6 registered parks and gardens. The Green Belt in Purbeck is part of the wider South East Dorset Green Belt that includes land around Bournemouth, Poole, Christchurch and other parts of East Dorset.

### The Development plan

20. The Purbeck Local Plan (2018-2034) will replace the Purbeck Local Plan Part 1 [PLP1] 2012 which, following examination, included a requirement upon adoption to undertake an immediate review to meet housing needs. The Purbeck Local Plan subject of this examination will form the statutory development plan for the Purbeck area, along with the Swanage Local Plan (adopted in 2017 with a Plan period running until 2027), Minerals and Waste Local Plans jointly produced for Dorset and any made neighbourhood plans

(existing made neighbourhood plans include Arne, Bere Regis, Lytchett Matravers and Wareham).

21. The Local Development Scheme [LDS] for Dorset Council - October 2022 provided an expected timetable for preparation of the Dorset Council Local Plan. It confirmed an anticipated submission date for examination of April 2025, with a provisional adoption date of Spring 2026 suggesting that it would not be in place for at least another two years. It has been drawn to our attention that a recent update has been provided in a revised LDS published in March 2024 and that it is now intended to be a new-style local plan with adoption anticipated in May 2027. It is also indicated that the Dorset Council Local Plan, once adopted, will look ahead until at least 2042 and that it will replace all existing local plans in the Dorset Council area upon adoption.

### **Changes to the planning system and the Covid-19 pandemic**

22. New chapters and updates to the Planning Practice Guidance [PPG] have been published since the Purbeck Local Plan was submitted. Accordingly, we have had regard to these in the examination.
23. On 21 July 2020, the Government published The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. These regulations amend the Use Classes Order [UCO] in relation to England by inserting a new Schedule 2. The revised Schedule 2 subsumes many of the former use classes into new classes of use (Class E (commercial and business services); Class F.1 (learning and non-residential institutions) and class F.2 (local community)).
24. The changes to the use classes are likely to have a particular effect on the policies and chapter of the Plan relating to the economy, specifically Policies EE1, EE2 and EE3. Some of the MMs recommended in this report are in response to those changes to the UCO which came into effect on 1 September 2020. However, we have not recommended substantive changes to the Plan's spatial strategies or policies because to do so would be inconsistent with current national planning policy or the evidence that supports these policies. The preparation of the Dorset Council Local Plan gives the Council the opportunity to fully consider the implications of changes to the UCO by gathering suitable evidence and developing appropriate strategies to meet Dorset's, and therefore Purbeck's, future development needs beyond the timeline of this Plan.
25. The Levelling-up and Regeneration Act 2023 received Royal Assent on 26 October 2023. It is wide-ranging in coverage and has provisions that make changes to the planning system in England. However, the relevant provisions and schedules relating to development plans and plan-making, heritage, self-build and custom housebuilding, planning obligations, a new infrastructure levy and environmental outcomes reports have not yet commenced and require regulations or commencement orders to be set in secondary legislation. Part 7

and Schedule 15 relating to nutrient pollution standards did, however, commence on 26 December 2023 and have been taken into account as part of our findings in Issue 10 of this report.

26. A statutory framework for biodiversity net gain [BNG] has also been set out under Section 90A and Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act [TCPA] 1990. This legislation was inserted into the Act by Schedule 14 of the Environment Act 2021 and includes amendments made by the Levelling Up and Regeneration Act 2023 and the Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations [2023]. Under the statutory framework for BNG, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the BNG objective. The objective is to deliver at least a 10% increase in relation to the pre-development biodiversity value of the site. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or biodiversity credits.
27. From 12 February 2024, BNG is mandatory for new planning applications for major development made under the TCPA, subject to confirmed exemptions. Major development includes residential developments with 10 or more dwellings, or where the site area is greater than 0.5 hectares. BNG for small sites has an extended transition period and will apply from 2 April 2024. It follows that references to securing net gains for biodiversity in this report are made in the context of national policy and any mandatory statutory requirements that are relevant to development proposals.
28. A revised Framework was published on 20 July 2021, with further revised versions of the Framework subsequently published on 5 September 2023 and on 19 December 2023. The revised versions of the Framework replace the previous version of the Framework published in February 2019 that was in place at the time of submission, with the current version now being that which was published in December 2023. However, when taking account of the transitional arrangements in paragraph 230 of the Framework - December 2023 version, it is the Framework version published in September 2023 that at the present time applies to all plans submitted for examination after 24 January 2019. This includes the Purbeck Local Plan. The references to the Framework in this report, therefore, are to the version published in September 2023.
29. Part of the examination of the Purbeck Local Plan was undertaken during the Covid-19 pandemic. The medium and long term social, economic and environmental impacts of the pandemic for the implementation of the Plan could be significant but are difficult to predict. With regard to the pandemic and longer-term planning reform, the Government has made it clear that it is important to get local plans in place under the current system. That is what the Council wishes to do, and we have carried out the examination accordingly.

## Public Sector Equality Duty

30. The Council carried out an equalities impact assessment and health impact assessment<sup>1</sup>. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010 and in particular considered how the Plan's policies and proposals are likely to affect people from groups with 'protected characteristics'. This has involved our consideration of several matters during the examination including those relating to different types of housing need, including for elderly people, people with disabilities and gypsies, travellers and travelling show people; promoting a prosperous and diverse local economy; improving accessibility and transport and encouraging healthy communities. Our findings in relation to those matters are set out in subsequent sections of this report.

## Assessment of Duty to Co-operate

31. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. S33A requires local planning authorities and other bodies subject to the DtC to engage constructively, actively, and on an on-going basis with one another in order to maximise the effectiveness of plan preparation. The Council is also required to have regard to the activities of each Local Enterprise Partnership [LEP] and each Local Nature Partnership so far as those activities are relevant to plan preparation.
32. The Dorset Strategic Planning Forum [SPF] was created in 2015 in order to allow Dorset Councils, and prescribed bodies/persons, to proactively and constructively engage with each other on strategic matters across Dorset. It was a member level forum supported by an officer group (the Strategic Planning Policy Managers Forum) which met regularly and on an ongoing basis since 2015. Following the creation of the unitary councils in 2019, this was replaced by the Bournemouth, Christchurch and Poole Council and Dorset Council Joint Strategic Planning and Transport Advisory Committee.
33. A Statement of Common Ground [SoCG], as required by the PPG, has been submitted<sup>2</sup>. The initial SoCG was prepared by the Dorset Councils in October 2018 and then finalised, by the signature of all the participating authorities, in March 2019 (prior to local government reorganisation in Dorset). The final SoCG is the same in its content as that prepared in October 2018. However, there is no evidence to indicate that there was a material change in circumstances in the intervening period up to the submission of the Plan at the end of January 2019.

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<sup>1</sup> Document SD04

<sup>2</sup> Document SD10a

34. The SoCG is consistent in its form and content with the guidance provided in the PPG. It identifies the administrative area that it relates to, identifies the key strategic cross boundary matters addressed, or to be addressed, through joint working, identifies the relevant plan making bodies who are signatories, describes governance arrangements for the statement, identifies housing requirements for the area covered by the SoCG, describes the Councils' approach to addressing housing requirements across the area and records agreed approaches to strategic matters.
35. The Council has engaged actively (as a member of the SPF) and on an ongoing basis to constructively address strategic cross boundary matters by jointly preparing evidence which relates to at least two planning areas to inform strategies and policies (relating to housing, gypsies, travellers and travelling showpeople, employment and retail/leisure). It has also jointly prepared Supplementary Planning Documents [SPDs] (relating to Dorset Heathlands and Poole Harbour) to avoid/mitigate the adverse effects of development on European sites which form part of a network extending over two planning areas or which overlap two planning areas.
36. The evidence in the East Dorset Strategic Housing Market Assessment [SHMA] published in 2015 (SD21) identified the Purbeck area as within the East Dorset Housing Market Area [HMA], which at the time consisted of five other local authorities (Bournemouth, Poole, Christchurch, East Dorset and North Dorset). Following local government reorganisation, the former Purbeck District subject of this Plan along with the former East Dorset and North Dorset districts are now within the Dorset Council unitary authority, with the remaining three former districts now falling within the Bournemouth, Christchurch and Poole Council unitary authority.
37. As part of the ongoing work with those authorities it had been confirmed that none are able to meet any of Purbeck's housing need. It is evident that the Purbeck area now falls within a unitary authority covering a larger geographic area which includes other sub-areas of the East Dorset HMA. Nonetheless, there are local needs for housing to be met as identified in the Purbeck Strategic Housing Market Assessment [SHMA] published in 2018 (SD20). Accordingly, the Purbeck Local Plan seeks to meet its own housing need.
38. The SoCG indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to local authority areas adjoining Dorset there is a risk of unmet housing need from New Forest District. However, it also indicates that the extent to which other areas in Dorset can meet their own needs is not fully understood, as the work on assessing potential development options in each area is at different stages.

39. The SoCG indicates that the Dorset local planning authorities are committed to work together to assess the potential for some or all of their need to be met within other Dorset authorities' areas and that this work will need to be informed by an appraisal of all reasonable options for the distribution of growth across Dorset, taking account of issues such as land availability, infrastructure capacity and development constraints. It also indicates that following the adoption of the New Forest District Local Plan, there is likely to be a need for work on reviewing that plan's strategic housing policies to begin promptly in response to updated housing requirements calculated using the standard methodology. Such a review is considered likely to coincide with the preparation of local plans in the two recently formed unitary authorities (Dorset Council and Bournemouth, Christchurch and Poole Council) which share boundaries with New Forest District Council. This would therefore provide an opportunity for the Councils to effectively co-operate in addressing future housing need.
40. Based on the above therefore, we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Purbeck Local Plan and that the duty to co-operate has been met.
41. The tests of soundness include a requirement that local plans are positively prepared which could include meeting any unmet housing need for neighbouring authorities. Therefore, we return to this matter below in our assessment of soundness.

## **Assessment of Other Aspects of Legal Compliance**

### **The Local Development Scheme [LDS]**

42. The LDS sets out a programme for preparing the Plan and indicates its scope and content. The subject matter and geographic area covered by the Plan accord with the LDS of February 2018<sup>3</sup> which accompanied the submission of the Plan. Timings on the consultation, publication and submission of the Plan also correspond with the LDS. There have been subsequent updates to the timetable in the LDS in July 2019<sup>4</sup>, October 2022<sup>5</sup> and the current version published in March 2024. Notwithstanding the slippage in the timetable for its adoption, the Plan has been prepared in accordance with the LDS.

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<sup>3</sup> Document SD11

<sup>4</sup> Document SD60

<sup>5</sup> Document SD142

## Public Consultation

43. Consultation on the Plan, the proposed MMs, FMMs and SMMs was carried out in compliance with the Council's Statement of Community Involvement [SCI]<sup>6</sup>.
44. The consultation and publication periods are consistent with, or exceed, the requirements set out in the SCI and the relevant regulations, as evidenced in the various Consultation Reports<sup>7</sup> and the Consultation Statement<sup>8</sup>. This included consultation on Issues and Options (2015), Options (2016), New Homes for Purbeck Options (January-March 2018) and the proposed submission version of the Plan (October-December 2018).
45. At each stage of the preparation of the Plan relevant documents were available electronically on the Council's website and in paper form at the District Council Offices, the offices of Lytchett Minster and Upton Town Council, Swanage Town Council and Wareham Town Council and at various other community buildings. Advertisements and notices were placed in the local press and leaflets distributed in various locations throughout the then Purbeck district.
46. Residents and businesses were notified of the various option consultation stages. Leaflets were sent to every address in the district in 2015 and in 2016 to every home in both Purbeck district and the village of Crossways which, at that time, was in the neighbouring district of West Dorset and in 2018 a hardcopy questionnaire was sent to all households and businesses in Purbeck district and Crossways. The Council's local plan database (refreshed post introduction of the General Data Protection Regulations 2018) was used to notify people of the consultation stage on the submission version of the Plan.
47. Visits were made to local secondary schools to gain the views of young people during the options consultation in 2016 and a series of drop-in events were held at various locations across Purbeck district at the consultation stages on the options, including a special infrastructure drop-in session at the options consultation in 2018. Although similar drop-in sessions were not held at the consultation stage on the proposed submission version of the Plan, a session was held at the end of November 2018 to assist residents in Wool in making representations on the Local Plan. This was in response to a specific request from residents. Use was also made of local media briefings and social media to publicise the options consultation stages in 2016 and 2018 and the submission version of the Plan in 2018.
48. The Council designed its response questionnaire for the consultation stage on the submission version of the Plan (using a standard format) to obtain people's

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<sup>6</sup> Document SD05

<sup>7</sup> Documents SD06a, SD06b, SD06c and SD06d

<sup>8</sup> Document SD07

views on whether they considered that the Plan was sound, legally compliant and whether it has been prepared in accordance with the DtC under section 33A of the 2004 Act. The questionnaire was available to complete online (the Council's stated preference) or on paper. The Council published a guidance note, which was made available on request and published online, to explain the online representations procedure. Responses submitted electronically or in paper copy were accepted provided they were received by the deadline.

49. Concerns have been raised regarding the consultation process at various stages of the Plan's preparation and during the examination. These include the timing of some consultation stages, difficulties in navigating the website, locating supporting documents and evidence on-line, submitting responses using the on-line portal, the extent of advance notice provided for some public events and the timing of consultation events. Whilst there may have been some imperfections in the consultation process, the Plan has nevertheless been widely publicised throughout its preparation and examination. Overall, therefore we are satisfied that sufficient publicity has been carried out and that interested parties have had adequate opportunity to engage in the process and make representations. There is no clear evidence to indicate that any party has been denied an opportunity to comment or that their interests have been prejudiced.
50. The Council has prepared detailed and comprehensive reports which summarise the planning matters and issues raised during the various consultations during plan preparation<sup>9</sup>. It adjusted its approach to the process of gathering and reviewing evidence and drafting strategies and planning policies to take account of relevant responses made during the consultations in addition to informal guidance provided by third parties<sup>10</sup>. We are satisfied that the consultation on the Plan was undertaken in a robust manner and in accordance with the Regulations.
51. Consultation on the MMs and FMMs was undertaken during the Covid-19 pandemic. The Council reviewed its SCI prior to the consultation on the MMs and consultation on both the MMs and FMMs, and on the subsequent SMMs in 2023, was undertaken in accordance with the relevant government regulations and guidance that applied at the time.

## **Sustainability Appraisal [SA]**

52. SA incorporating Strategic Environmental Assessment [SEA] in accordance with the European Directive 2001/42/EC was prepared alongside the development of the Local Plan. This was an iterative process comprising of the SA/SEA scoping report in 2013<sup>11</sup>, the SA/SEA report for the Issues and Options consultation in

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<sup>9</sup> Documents SD06a, SD06b, SD06c, SD06d and SD07.

<sup>10</sup> For example, in the Council's response to the Inspector's Question 3 of Matter A Issue 3

<sup>11</sup> Document SD68



2015<sup>12</sup>, the SA/SEA report for the options consultation in 2016<sup>13</sup>, the SA/SEA report for the options for the New Homes for Purbeck consultation 2018<sup>14</sup> and the SA/SEA report assessing the suitability of the proposals in the draft plan<sup>15</sup>. To aid consideration of the spatial strategy an addendum to the SA<sup>16</sup> was submitted by the Council during the hearing sessions of the examination. This provided an assessment of baseline data and the potential for growth in the towns and key service areas within the area covered by the Plan. It was also published alongside the schedule of proposed MMs during the consultation period on the MMs. SA of the MMs, the FMMs and SMMs was also undertaken<sup>17</sup>. The SA of the MMs, the FMMs and the SMMs took account of the Appropriate Assessment [AA] in the HRA as required by the PPG<sup>18</sup>.

53. SA was undertaken at all stages of the preparation of the Plan and a wide range of options, and their reasonable alternatives were assessed against SA objectives that encompass the likely environmental, social and economic effects of the Plan. The Plan itself and reasonable alternatives to it have been assessed and reasons have been given for selecting the alternatives that have been considered.
54. Whilst there has been criticism made by representors that the SA documents have been difficult to follow, that earlier iterations of the document have not always been available to review at subsequent stages, that there were gaps in the range of options considered including different options with regards to the various settlements and the spatial strategy, and the robustness of the scoring mechanism, we are satisfied that the SA process has been carried out satisfactorily and that there is nothing which materially undermines the SA findings.
55. As indicated above the SA was an iterative process. The SA does not need to be done in any more detail, or using more resources, than is appropriate for the content and level of detail in the Local Plan<sup>19</sup>. A range of options and their reasonable alternatives were assessed against SA objectives that encompass the likely environmental, social and economic effects of the plan. Whilst the Council acknowledges that there are other options for development it has indicated why these were not considered reasonable and therefore not assessed in any level of detail. This is not an unreasonable approach to take and we are satisfied that all reasonable alternatives, where they exist, (and conceivably would have a realistic prospect of delivery during the plan period) have been tested. There is inevitably an element of subjectivity in any

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<sup>12</sup> Document SD69

<sup>13</sup> Document SD52

<sup>14</sup> Document SD54

<sup>15</sup> Document SD02

<sup>16</sup> Document SD92

<sup>17</sup> Documents MMCD4, FMMCD2 and SMMCD3

<sup>18</sup> PPG Ref ID: 11-003-20190722

<sup>19</sup> PPG Ref ID: 11-009-20140306

assessment against a set of criteria and although others might have allocated different scores on certain points, we are satisfied that overall, the assessments in the SA were reasonable.

56. It follows that we are satisfied that the SA process of the Purbeck Local Plan is sufficiently robust and consistent to all sites and policies. In overall terms an adequate SA of the Plan has been carried out and reasonable alternatives have been considered to a sufficient degree.

### **Habitats Regulations**

57. The Plan was subject to a HRA during its preparation. The HRA has been updated as the Plan has developed through the various stages from Issues and Options in 2015, Preferred Options in 2016, the New Homes for Purbeck specific housing consultation in 2018, pre-submission Plan<sup>20</sup> and to take account of the proposed MMs<sup>21</sup>, FMMs<sup>22</sup> and SMMs<sup>23</sup>. The various iterations of the HRA have been informed through close working with statutory bodies namely the Environment Agency and Natural England.
58. The updated HRAs (October 2021) and (November 2023)<sup>24</sup> set out that an AA has been undertaken and concludes that following AA the Purbeck Local Plan as modified is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects, alone or in-combination, on European site integrity can be drawn. Natural England does not dissent from these conclusions. In addition, several policies of the Plan are subject to MMs/FMMs/SMMs to ensure legal compliance in relation to the requirements of the Habitats Regulations. These are dealt with separately in soundness terms under the relevant issues below.
59. In reaching the above findings, we have taken account of responses to consultations and discussions in the hearing session in July 2022 which raised issues in terms of the reliance upon the identification of interim mitigation projects which do not extend to the end of the plan period. However, we are satisfied that the Council's firm commitment to the ongoing preparation of the Dorset Local Plan would provide the appropriate mechanism to identify and deliver a sufficient pipeline of projects up to 2034 and beyond.

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<sup>20</sup> Document SD03

<sup>21</sup> Document MMCD3

<sup>22</sup> Document FMMCD3

<sup>23</sup> Document SMMCD2

<sup>24</sup> Documents FMMCD3 and SMMCD2

## Other Legal and Procedural Requirements

60. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
61. The Plan, taken as a whole, includes policies designed to ensure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Policies in the Local Plan relating to flood risk, sustainable drainage systems, coastal change management areas and housing development contribute towards securing adaptations through development/land uses to the impacts of climate change. In addition, policies relating to the spatial strategy, renewable energy, design, housing and improving accessibility and transport contribute towards mitigating the effects of climate change through securing appropriate land use and development.
62. The Regulations indicate that a SPD does not have statutory force and is not the subject of examination. It is defined as something that is not a local plan<sup>25</sup>. Consequently, policies should not devolve fundamental matters to a SPD. Several policies within the submitted Plan require compliance with a SPD or other standalone document thereby giving development plan status to documents which are not part of the Plan and which have not been subject to the same process of preparation, consultation and examination. This would not be compliant with the Regulations. Therefore, in so far as they relate to this matter **MM2**, **SMM19**, **SMM20**, **SMM21**, **SMM32**, **SMM68**, **MM70**, **SMM71**, **MM75** and **SMM84** are necessary.
63. The Purbeck Local Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations, except where indicated and MMs, FMMs and SMMs are recommended.

## Assessment of Soundness

### Main Issues

64. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified 15 main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

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<sup>25</sup> Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012

## Issue 1 - Is the Plan period justified?

65. At the time of the Plan's submission, it was envisaged that it would be adopted in 2019. Accordingly, the Purbeck Local Plan looks ahead to 2034, including in terms of housing and employment land need and supply. However, as the Plan is now likely to be adopted in 2024, it does not meet the expectation indicated in the Framework that strategic policies should look ahead over a minimum 15-year period from adoption.
66. Nonetheless, Purbeck District has now been amalgamated into Dorset Council which aims to have its own Plan in place within the next five years. As such, there is effectively an immediate and ongoing review of the development plan for the Purbeck area that would be capable of providing for needs arising beyond 2034. It follows from the above that it would serve little practical benefit to extend the plan period beyond 2034 at the current point in time. Indeed, the inevitable and considerable delay in the adoption of the Plan which would result if it were revised to have at least a 15-year post-adoption period would outweigh any benefit that would arise from extending the plan period. We, therefore, consider that in the particular circumstances of Purbeck District outlined, it is reasonable and justified that this Plan maintains a plan period up to 2034.

### Conclusion

67. We, therefore, conclude that the Plan period is justified.

## Issue 2 - Does the Plan set an appropriate framework, and allow an appropriate role for neighbourhood plans in Purbeck?

68. The submitted Purbeck Local Plan indicates that all its policies are strategic. However, some of the policies relate to very detailed matters and are non-strategic. Therefore, we conclude that **SMM1** and **SMM31** are necessary to clarify this. In addition, **SMM24**, **SMM43**, **SMM45**, **SMM46**, **SMM47**, **SMM71**, **SMM72** and **MM73** are necessary to clarify the application of the strategic policies of the Local Plan and non-strategic policies of Neighbourhood Plans. The modifications ensure consistency with national policy in this respect.

### Conclusion

69. Subject to the modifications outlined above, we conclude that the Plan sets an appropriate framework and allows an appropriate role for neighbourhood plans in Purbeck.

### Issue 3 - Is the housing need figure robust?

70. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national policy. The associated guidance in PPG sets out the approach to calculating a minimum annual local housing need figure using the standard methodology. It also indicates that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process but that this number should be kept under review and revised where appropriate. In addition, it is clear that the local housing need calculated using the standard method may be relied upon for a period of two years from the time that a plan is submitted for examination<sup>26</sup>.
71. Policy H1 of the Purbeck Local Plan, informed by the 2018 Strategic Housing Market Assessment (SHMA) update for Purbeck<sup>27</sup>, identifies an annual local housing need figure of 168 homes which for the period covered by the Plan (2018 to 2034) equates to a figure of 2,688 homes. This was calculated using a base date of 2016 to calculate the projected average annual household growth over a 10-year period, together with the 2014-based household projections and the 2016 affordability ratio. However, at the time of this report, it is more than two years from the time that the Plan was submitted for examination and therefore, it is necessary that a more up-to-date calculation of the local housing need figure is undertaken.
72. With regard to the above, the preparation of the Purbeck Local Plan took place during a period of change and uncertainty in relation to guidance on calculating housing need. In that context, the Council set out a revised calculation in its evidence<sup>28</sup> that is calculated with a base date of 1 April 2022 for household growth over a 10-year period using the 2014-based household projections. It also includes the most up-to-date affordability ratios for Purbeck District published for 2022 that are consistent with the base year and therefore, that we have reasonably identified as the most robust from the evidence. This produces a figure of 187.4 dwellings per annum [dpa] which, when capped as indicated in the PPG (Step 3) results in a minimum local housing need figure of 185.5 dpa or 186 dpa (rounded), which is equivalent to 2,976 homes for the period covered by the Plan.
73. The PPG advises that there is an expectation that the standard method will be used for assessing local housing need and that any other method will be used only in exceptional circumstances<sup>29</sup>. Having regard to the Framework and PPG,

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<sup>26</sup> PPG Reference ID:2a-008-20190220

<sup>27</sup> Document SD20

<sup>28</sup> Document SMMCD5

<sup>29</sup> PPG Reference ID:2a-003-20190220

together with the evidence before us and the discussions at the hearing sessions we consider that exceptional circumstances do not exist in this case.

74. The PPG indicates that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area and that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. It also provides examples of such circumstances<sup>30</sup>.
75. It has been suggested that further uplifts are necessary to provide flexibility for economic growth, help deliver the required number of affordable homes and to accommodate unmet need from elsewhere in Dorset and neighbouring authorities. However, having regard to the Framework and PPG, the evidence before us and the discussions at the hearing sessions, we consider that further uplifts to take account of these factors are not necessary to make the Plan sound.
76. Whilst there is a general acceptance that there is likely to be some unmet need in neighbouring authorities particularly Bournemouth, Christchurch and Poole Council, New Forest District Council and the New Forest National Park, the extent of this is currently unknown. The figures suggested by participants to address some of any such unmet need are therefore somewhat arbitrary. Accordingly, it would be more appropriate to address this matter through the ongoing preparation of the Dorset Local Plan. The timetable indicated in the LDS published in March 2024 would mean that a Plan covering the whole of the new local authority area would be in place in a similar timeframe as the requirement for the standard 5-year review period for local plans indicated in the Framework and the Regulations<sup>31</sup>.
77. The area covered by the Purbeck Local Plan comprises large areas of international, national and local conservation value, Green Belt and/or high-quality landscape, including the Dorset National Landscape and the Dorset and East Devon Coast WHS. However, housing need is an unconstrained assessment of the number of homes needed in an area over a given period, it is assessed separately from considering land availability or any other factors that might prevent need from being met<sup>32</sup>. Accordingly, the above factors do not serve as exceptional circumstances to justify an alternative approach to the standard methodology for calculating housing need. Consequently, the appropriate housing need figure for the Plan area and period is 2,976 homes.

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<sup>30</sup> PPG Reference ID:2a-010-20190220

<sup>31</sup> The Framework paragraph 33 and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012)

<sup>32</sup> PPG Reference ID:2a-001-20190220

However, we consider later in the report whether the submitted plan's policies to provide for this need figure are justified in the light of constraints.

## **Conclusion**

78. The housing need figure identified is supported by robust evidence.

## **Issue 4 - Is the overall spatial development strategy of the Plan sound?**

79. The vision statement in the Plan sets out a high-level strategy for Purbeck to achieve sustainable development that meets the need to provide new homes, jobs, services and facilities whilst protecting the distinctive natural and historic characteristics of Purbeck's unique environment. The approach to achieving the vision is set out in ten key objectives which cover the areas of environment, housing, economy and infrastructure and aim to build on the strengths of the area and address its challenges.

80. The vision includes an aspiration to spread development across Purbeck, with the majority of new homes being in the less environmentally constrained areas. It seeks to continue to support development in the towns (Swanage, Wareham and Upton) and key service villages where growth will be proportionate to the size and character of the settlement. It also indicates that limited developments that are sympathetic to their surroundings will be supported elsewhere across the Plan area.

81. The vision also seeks that an appropriate mix of housing sizes and tenures is provided, including supported housing for the elderly and other groups with special needs. It also indicates that the focus for economic development will be on increasing the number and range of knowledge economy jobs, building on the area's strengths in advanced engineering and manufacturing to support high quality employment which will raise wage levels and help address the issue of housing affordability in the area.

82. The spatial development strategy of the Plan is largely focussed on housing provision which, following on from the examination of PLP1 and the requirement to undertake an early review to allocate more housing, is reasonable. Housing provision is therefore, one of the most significant issues that the Plan needs to address. In that regard, it is evident that the role and function of the Plan has evolved during this examination, as the preparation of the Dorset Local Plan continues to progress separately. However, to continue to support the Government's objective of significantly boosting the supply of homes, it remains important through this Plan that a sufficient amount and variety of land can come forward where it is needed in Purbeck, particularly in advance of the anticipated timescales for adoption of the Dorset Local Plan.

83. As acknowledged by the Inspector in his report on the examination of the PLP1 and as referred to above, there are several significant constraints to development within Purbeck. Accordingly, the spatial development strategy of the Plan has necessarily been guided by national planning policies relating to these areas and assets of particular importance.
84. The largest settlements in Purbeck (Swanage, Upton and Wareham) are all subject to a number of the significant constraints to development. Therefore, it is reasonable to consider opportunities for development as much as possible in those parts of Purbeck where land is less environmentally constrained.
85. The spatial development strategy of the Plan was informed by an assessment of reasonable alternatives for meeting housing need and delivering the housing requirement, in the context of the environmental and policy constraints and with regard to the responses to public consultation on the options for the overall strategy<sup>33</sup>. It is set within the context of a settlement hierarchy and seeks to spread development as much as possible by releasing some areas of the Green Belt to provide for housing development, as well as providing for development in the less environmentally constrained west of the area. Our conclusions relating to exceptional circumstances to release Green Belt are set out in Issue 5. The Plan also provides for housing development for the designated neighbourhood areas of Wareham and Bere Regis.
86. Policy V1 sets out the number of new homes allocated for housing in the spatial strategy. However, not all of the new homes identified for neighbourhood plan sites at Wareham and Bere Regis are developable in the Plan period. **SMM5** is necessary to clarify the number of homes likely to come forward in the plan period. In addition, in the interest of effectiveness the modification includes necessary flexibility on the indicative capacity of sites to ensure development proposals make an efficient use of land. It also necessarily clarifies the alignment with the small sites policy.
87. **SMM3** is necessary to provide clarity by elaborating on the justification for the spatial development strategy for meeting the areas housing needs and to clarify that the spatial strategy for development is set within the context of a settlement hierarchy. To ensure that the Plan is justified, **SMM4** is also necessary to explain that the settlement hierarchy remains unchanged from PLP1 apart from Redbridge Pit/Moreton Station which has been recategorised as a key service village in recognition of the residential development and supporting infrastructure proposed in the Plan and reflect our findings in Issue 6.
88. Policy V1 sets out the scale, type and distribution of development consistent with the overarching vision and spatial development strategy of the Plan. In relation to housing development, it provides for most new housing in the less

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<sup>33</sup> Options for the New Homes for Purbeck consultation 2018 - [link](#)



environmentally constrained parts of the Plan area, including Wool, Redbridge Pit/ Moreton Station and Bere Regis. It provides for some growth at the towns of Wareham and Upton and provides for housing allocations at the service villages where these are appropriate, taking account of environmental and policy constraints (Bere Regis, Lytchett Matravers, Redbridge Pit / Moreton Station, and Wool). The provision within the policy to meet the housing needs of elderly people and people with disabilities at Wool and Redbridge Pit / Moreton Station is consistent with the vision and with the focus within the overall spatial strategy on the less environmentally constrained parts of the plan area. However, **SMM5** is necessary as a consequence of other modifications recommended in this report to reflect the updated evidence in relation to care accommodation in Purbeck.

89. **SMM5** is also necessary to clarify that housing supply associated with the Swanage Local Plan (as otherwise referred to in Issue 6), including extant planning permissions, allocations, small sites and windfall development form a part of the Council's spatial development strategy for meeting the areas housing needs. **SMM5** also includes required changes for effectiveness and consistency with national policy in relation to achieving appropriate densities and ensuring an efficient use of land by providing flexibility around the identified site capacities. In addition, it necessarily adds a supportive approach for high quality small scale development on unallocated sites within and adjoining settlement boundaries where outside the Green Belt, with associated criteria to be met. For effectiveness, it also removes reference to Policy H8 as it is a criteria-based policy that does not allocate sites.

## Conclusion

90. Subject to the modifications outlined above, we conclude that the overall spatial development strategy of the Plan is sound.

## Issue 5 - Are there exceptional circumstances to justify the alterations to the Green Belt proposed in the Plan, and are any other alterations justified?

91. The Purbeck Local Plan seeks to remove land from the Green Belt at Wareham, Upton and Lytchett Matravers to allocate for residential development.
92. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans as set out in the Framework. It is also clear that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries it should be demonstrated that all other reasonable options for meeting the identified need for development have been examined fully. Accordingly, it is necessary to consider the releases of Green Belt as proposed in the submitted Plan in terms of function and purposes, and whether

there are exceptional circumstances to justify the approach outlined as required by national policy.

### **Release of Green Belt for residential development**

93. During the examination of PLP1, the Inspector concluded that the Council had not fully explored all housing growth potential in Purbeck and was therefore required to undertake an immediate review of the plan to meet housing needs<sup>34</sup>. As set out earlier, it has subsequently become clear that Purbeck's neighbouring authorities are unable to meet any of its needs. It follows that the Plan necessarily sets out a housing requirement that reflects the identified housing need in the Purbeck area in full (as per the conclusions in Issues 3 and 6) which reflects a clearly long-standing, pressing need for additional housing.
94. Taking account of the Framework objective of significantly boosting the supply of homes it is reasonable, given the passage of time since the adoption of the PLP1 in 2012, that contributions to addressing the identified housing needs in the Purbeck area should be sought without further delay. This includes, where possible, that overcoming constraints to housing delivery should be pursued through this Plan. It follows that we are satisfied that an alternative approach of deferring housing allocations to the preparation and adoption of the Dorset Local Plan cannot reasonably be relied upon in the circumstances which have led to this Plan. This is noting that the delay until the adoption of the Dorset Local Plan would inevitably result in lower rates of annual housing delivery in the Purbeck area for a number of future years and thereby, exacerbate the level of unmet housing need in both the Purbeck area and the East Dorset HMA.
95. The Green Belt release and residential allocations at Lytchett Matravers and Upton would provide around 240 dwellings on four sites. The sites are:
- Blaney's Corner, Lytchett Matravers (25 dwellings)
  - East of Flowers Drove, Lytchett Matravers (30 dwellings)
  - East of Wareham Road, Lytchett Matravers (95 dwellings)
  - West of Watery Lane, Upton (90 dwellings)
96. The alterations proposed to the Green Belt at Upton and Lytchett Matravers have been informed by the various consultations undertaken to inform the Council's identification and assessment of reasonable alternatives for the spatial development strategy for the area. They also followed a search for sites to minimise development in the Green Belt, a review of the opportunities for

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<sup>34</sup> Report on the Examination into the Purbeck Local Plan (Part 1) 31 October 2012 - [link](#)

meeting housing need on previously developed land, consideration of the scope for maximising housing densities, the consideration of opportunities for development in town centres and the lack of scope for neighbouring authorities to help meet Purbeck's housing needs.

97. The three sites proposed for removal from the Green Belt for residential development at Lytchett Matravers are all modest parcels of undeveloped land between existing residential development and are closely related to the existing village. Residential development on all of the sites would not, due to their individual size and position, fundamentally undermine the function or purposes of the Green Belt as defined in national policy. In addition, residential development on the sites would provide for clear and consistent boundaries to be formed around the edges of the village which are likely to be permanently retained.
98. The site at Upton, whilst strategically more significant than the Lytchett Matravers sites, given its position on the edge of the built-up area and in the gap between the western edge of the conurbation and Lytchett Minster, is a modest parcel of land which is closely related to the existing town. Residential development on the site would not fundamentally undermine the function or purposes of the Green Belt. Furthermore, the site is defined by physical boundaries that are likely to remain permanent and contain further encroachment of the countryside.
99. Having regard to the above, we set out our findings on whether exceptional circumstances exist to alter the Green Belt boundaries for the three sites in Lytchett Matravers and the site at Upton later in this issue, following necessary consideration of compensatory improvements.
100. The Plan as submitted also seeks to remove land from the Green Belt at Wareham (adj. Carey Rd/west of Westminster Rd Industrial Estate) to enable it to be allocated for residential development through the Wareham Neighbourhood Plan to meet its devolved housing requirement as referred to in Issue 6.
101. Following submission of the Plan the Council indicated that, in the light of continuing work with the Wareham Neighbourhood Plan Group and more recent evidence regarding the Wareham Health Hub, there are now alternative reasonable options to provide the requisite housing provision for Wareham through the emerging Neighbourhood Plan within the existing settlement boundary. The Wareham Neighbourhood Plan has now been made. Consequently, there is no need in principle to remove land from the Green Belt at Wareham to support the spatial development strategy of the Plan. On this basis, exceptional circumstances do not exist to justify releasing the land at Wareham from the Green Belt as proposed in the Plan as submitted. **SMM3**,

**SMM6** and **FMM7** make the necessary changes to Policy V2 and the supporting text for soundness by removing references to Green Belt release at Wareham. Consequential changes are required to the Policies Map to ensure consistency with the modification.

### Compensatory improvements to the Green Belt

102. SANGs are an important component of the Council's strategy for mitigating the adverse effects from housing in Purbeck on protected habitat sites by absorbing recreational pressure arising from new homes. Residential development on the three sites at Lytchett Matravers would be delivered alongside a new Flowers Drove SANG which in turn would provide a natural, publicly accessible green space and act as compensation to help offset the loss of Green Belt land.
103. The Flowers Drove SANG would support an expected contribution to housing supply from allocations in Lytchett Matravers, including immediate additions to deliverable supply at Blaney's Corner and East of Wareham Road that are both subject of undetermined planning applications. The SANG has planning permission (Council ref: 6/2019/530) with the prospective developer having expressed a commitment to its delivery in 2024 as part of their response to the SMMs consultation. The SANG has been identified<sup>35</sup> as having sufficient capacity to accommodate the residential allocations in Lytchett Matravers with the potential for some excess mitigation capacity for the impacts of other residential development on Dorset Heaths habitat sites, and based on the evidence we are satisfied that it is deliverable in those terms.
104. It is intended that the Flowers Drove SANG would be maintained to ensure that it remains attractive to visitors and continues to serve the intended function and purposes with respect to improving accessibility to Green Belt and mitigating the potential impacts of residential development on Dorset Heaths habitat sites. However, this is not sufficiently secured through the Plan as submitted. Consequently, for effectiveness and consistency with national policy, **FMM7** to Policy V2 and **SMM6** to the supporting text is necessary to provide clarity and ensure that the impact of removing land from the Green Belt is offset with the creation of SANG at Lytchett Matravers to improve accessibility to Green Belt and offset some of the impacts of removing land from it. Modification to Policy H6 is also necessary to ensure that the SANG is provided and managed in perpetuity [**SMM40**]. The policies map may also need to be amended to reflect this modification.

### Morden Park

105. As indicated above and addressed in detail in Issue 10, there is a need for SANG and other projects in Purbeck as part of the measures required to

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<sup>35</sup> SD146

mitigate the impacts on the Dorset Heaths habitat sites<sup>36</sup> from both allocated and unallocated residential development (which include commitments, windfall development and development arising from small sites - Policy H8 sites). In addition, the Council has a responsibility to bring existing habitat sites into a favourable condition when exercising its functions.

106. The HRA for PLP1 identified a need for a strategic SANG in the north of Purbeck. We agree with Natural England that the assessment presented in the HRA for PLP1 was robust and that a strategic SANG remains needed in the north of Purbeck to provide an alternative location specifically for those people visiting Morden Bog SSSI, SPA, SAC and Ramsar which is within the wider Wareham Forest area, and to address the additional effects of new housing development expected in the area. This is also indicated in the HRA accompanying this Plan.
107. The Council indicates that most of the land in the north of Purbeck that might be suitable as a strategic SANG is owned by two estates and that using the information presented in the options consultation document<sup>37</sup> and taking guidance from Natural England, it identified and assessed three alternative options for a potential strategic SANG in the north of the area<sup>38</sup>. All of those alternative options included an element of enabling development in the form of residential development or a holiday park and alterations to the Green Belt would be required to support the delivery of the enabling development. In each instance the SANG would also need to mitigate the impacts of the enabling development.
108. Policy I5 of the Plan as submitted provides a supportive approach for delivery of a strategic SANG together with enabling development in the form of a holiday park at Morden Park and in doing so, does not seek to release Green Belt. The Policies Map includes an allocation which taken with Policy I5 would permit the development of a strategic SANG and a holiday park to act as enabling development within the Green Belt, whilst also overlapping part of the 400 metre buffer relative to the Dorset heathlands as associated with Policy E8. Discussions during the hearings identified potential difficulties with the implementation of such a policy approach, including whether associated alterations to the Green Belt boundary at Morden Park should be made. In that respect, proposed MMs were put before us seeking to modify both Policies I5 and V2 of the Plan by releasing land from the Green Belt for the enabling development.

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<sup>36</sup> Dorset Heaths SAC, Dorset Heathland SPA and Ramsar and (Purbeck and Wareham) and Studland Dunes SAC are collectively referred to as Dorset Heaths Habitat Sites

<sup>37</sup> <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planningpolicy/purbeck/local-plan-review-purbeck/past-consultations-and-evidence.aspx>

<sup>38</sup> Document SD93

109. Following consideration of representations on the consultation exercise undertaken on the MMs<sup>39</sup>, the Council has indicated that, whilst it continues to seek the delivery of the strategic SANG at Morden, it considers that the proposed release of Green Belt land for a holiday park at Morden Park as enabling development is not justified nor consistent with national policy.
110. In considering this position, we have taken into account that a strategic SANG, such as proposed at Morden, of itself has the potential to be considered a form of development that is not inappropriate in the Green Belt as its use for recreation would be likely to preserve the Green Belt's openness in a way that is consistent with its purposes as indicated in national policy. In addition, its use also has the potential to enhance the beneficial use of the Green Belt (for example by providing an opportunity for public access and recreation) in accordance with national policy.
111. In contrast, based on the evidence before us, a holiday park at Morden Park would be inappropriate development in the Green Belt as it does not fall within the listed exceptions in national policy. Therefore, to be consistent with national policy, exceptional circumstances must be fully evidenced and justified to alter the Green Belt boundary to facilitate the enabling development. Furthermore, from our consideration of the evidence submitted and discussions during a focussed hearing in July 2022, it is clear that enabling development in the form of a holiday park is only one potential option to deliver the strategic SANG. The Council has confirmed that there are other alternatives such as making use of compulsory purchase powers in accordance with the requirements of Section 226 of the TCPA. The Council has also drawn attention to funding being collected through contributions from planning obligations and the Community Infrastructure Levy [CIL] to deliver habitat site mitigation projects. The projects include a series of alternative mitigation projects as set out in the Annual update on interim mitigation projects (November 2022)<sup>40</sup> and addressed in detail in Issue 10, which are expected to be delivered up to 2023/24 and the identification and delivery of further mitigation projects up to 2025/26.
112. It follows from the above, that it is evident that there are possible alternatives to the strategic SANG at Morden to provide a means by which to mitigate the impacts from new homes in the short term. However, there is a necessity to identify further projects to support the mitigation of effects from development both prior to and after the expected timeline for the adoption of the Dorset Council Local Plan. As such, we find that it is reasonable that delivery of a strategic SANG at Morden should be prioritised to contribute to that mitigation.
113. Nonetheless, when taking account of the potential for a strategic SANG in Morden to be not inappropriate in the Green Belt and the existence of other

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<sup>39</sup> Document FMMCD1

<sup>40</sup> Document SD146

options for its delivery, we find that exceptional circumstances currently do not exist to justify changes to Green Belt boundaries to facilitate enabling development in the form of a holiday park. It also follows that the inclusion of a specific reference to a holiday park in Policy I5 and as part of the allocation for the strategic SANG is not justified. In these circumstances, we are satisfied that if it were to be found that enabling development is the only feasible option to deliver the strategic SANG at Morden in the future, then a detailed scheme could be appropriately assessed as part of the planning application process. The planning application process could allow a suitable scheme to come forward if very special circumstances were to be demonstrated in accordance with national policy that applies to land within the Green Belt.

114. Accordingly, Policy I5 is not consistent with national policy and is unsound. **SMM76** provides the necessary clarity on the approach to delivery of the strategic SANG at Morden and alternative heathland infrastructure projects to mitigate the impacts of residential development as set out in the Interim Mitigation Strategy in advance of the adoption of the Dorset Local Plan. **SMM77** provides the necessary changes to Policy I5 to remove specific reference to the holiday park. It also provides necessary clarity on the design and management of the SANG being subject to criteria agreed with Dorset Council and Natural England to ensure that the mitigation would be effective. **SMM82** is also necessary to provide consequential amendments resulting from our findings in relation to Morden Park to update the monitoring framework to reflect the modifications to Policy I5. The policies map should necessarily be updated to ensure consistency with these modifications.

### **Exceptional circumstances**

115. The housing allocations at Lytchett Matravers and Upton would make an important and immediate contribution to boosting the supply of housing available to meet the identified pressing housing needs of Purbeck and achieve a sustainable pattern of development in accordance with the spatial development strategy of the Plan. This includes an expected contribution to deliverable supply from the allocations in Lytchett Matravers at Blaney's Corner and East of Wareham Road that are likely to boost housing delivery in the short term. The remaining allocations at Lytchett Matravers and Upton would also reasonably contribute to maintaining a pipeline of deliverable housing land supply in the longer term. It follows that individually and collectively the benefits of bringing forward the identified housing allocations released from the Green Belt in the Plan would outweigh any harm that would be caused to the purposes of the Green Belt. Accordingly, subject to **SMM6**, **FMM7**, **SMM40** and **SMM41** as referred to previously, we are satisfied that there are exceptional circumstances to justify the alteration of the Green Belt boundary at both Lytchett Matravers and Upton to provide for the allocation of housing on the four sites referred to above.

116. As a result of our previous findings in relation to Wareham and Morden Park there are no exceptional circumstances to justify the alteration of the Green Belt boundary in these locations. Accordingly, modifications are necessary to delete the references in the Plan as submitted to the removal of land from the Green Belt at Wareham and to amend the approach to Morden Park, and these have been previously set out above.
117. Exceptional circumstances have not been demonstrated to justify any other alterations to the Green Belt beyond those referred to at Lytchett Matravers and Upton above. This is noting that additional employment land is not required given the excess of available land remaining on existing employment sites to satisfy the required needs of the area and to support economic growth as per the conclusions in Issue 9. In addition, there is insufficient justification to alter Green Belt boundaries around the north-western corner of Lytchett Matravers and elsewhere beyond its settlement boundary. We reach that view having regard to the contribution that the remaining areas in Purbeck make to the purposes of the Green Belt, particularly safeguarding the countryside from encroachment.
118. In summary, given the long-standing and pressing need for additional housing in Purbeck as referred to previously, we are not persuaded that there is merit in deferring the consideration of Green Belt release in Lytchett Matravers and Upton to the forthcoming Dorset Council Local Plan. Addressing the local need for additional housing and providing suitable locations to immediately boost the rate of housing delivery in the Purbeck area constitute exceptional circumstances that outweigh the harm arising from the release of Green Belt as set out above.

### **Other matters**

119. Policy V2 of the Plan relates to the Green Belt, including setting out the boundary amendments in the Plan. However, the wording of the policy is not entirely consistent with national policy in relation to the purposes of the Green Belt. **FMM7** addresses this matter and ensures consistency with national policy by also removing unnecessary duplication in local planning policy.

### **Conclusion**

120. Subject to the modifications indicated above, we conclude that there are exceptional circumstances to justify the alterations to the Green Belt in Upton and Lytchett Matravers proposed in the Plan. In addition, the modifications to other policies described above are also necessary to ensure that they are effective and consistent with national policy. Exceptional circumstances have not been demonstrated to justify any other alterations to the Green Belt beyond those referred to above.



## Issue 6 - Is the approach to the housing requirement and housing supply in the Plan soundly based?

### Housing requirement

121. In Issue 3 we conclude that the housing need figure for the plan area/period is 2,976 homes and in Issues 4 and 5 we conclude that the plan's spatial strategy and proposed release of land in the Green Belt for housing at Lytchett Matravers and Upton are justified. In the light of this and our findings below in relation to the Plan's other allocations for housing and its forecast of the overall supply of housing, we conclude that there are not constraints which would justify setting a housing requirement figure below the identified need figure of 2,976 homes. For the Plan to be justified **SMM25, SMM26, SMM27, SMM29** and **SMM88** are therefore needed to update Policy H1 and references throughout the plan to the housing requirement figure.
122. The Framework indicates that policies in local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. In addition, as indicated above, the level of minimum local housing need figure of 186 dpa (rounded) is a capped figure. In such circumstances the PPG indicates that strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible. In this case the Dorset Local Plan referred to above which is currently in preparation would provide the appropriate vehicle for such a review. Modifications are necessary to parts of the Plan to reflect the above. Accordingly, **SMM1, SMM25** and **SMM26** are necessary for clarification and to ensure that the Plan is positively prepared and consistent with national policy.
123. National policy in the Framework indicates that strategic policies should set a housing requirement for designated neighbourhood areas which reflects the overall strategy for the patterns and scale of development and any relevant allocations. Six neighbourhood plan areas have been designated in the area covered by the Purbeck Local Plan<sup>41</sup> and the Council has worked with the various neighbourhood planning groups to identify appropriate housing requirements for the designated areas.
124. Informed by local evidence emerging through the neighbourhood planning process, Policy H2 of the Plan indicates the contributions that the Bere Regis and Wareham neighbourhood plan areas are expected to make toward meeting Purbeck's overall housing need. It does not identify any specific figures for Arne and West Lulworth neighbourhood plan areas as, in accordance with the overall development strategy for Purbeck, any housing in these areas is expected to come forward from either windfall development or on small sites which meet the

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<sup>41</sup> Arne, Bere Regis, Lytchett Matravers, Wareham, West Lulworth and Wool.

criteria set out in Policy H8. Furthermore, although this Plan includes housing site allocations for Lytchett Matravers and Wool, specific housing requirements for these designated neighbourhood plan areas have not been identified, given the timing of their neighbourhood plan preparation. This is not an unreasonable approach to take given that the Lytchett Matravers Neighbourhood Plan was made in June 2017 and does not allocate any sites for housing, whilst the Wool neighbourhood area was designated in June 2018 at a relatively late stage in the preparation of this Plan. However, to ensure that the Plan is effective, **SMM26** and **SMM27** are necessary to clarify the approach taken and provide an up-to-date position on Neighbourhood Plans.

### **Housing land supply**

125. Policy H2 of the submitted Plan seeks to set out the components of housing land supply to meet the identified housing need in Purbeck and its distribution across the area. However, it does not identify all the components that make up this. Accordingly, Policy H2 requires modifying in this respect. It is also necessary to modify the policy to ensure it reflects the most up-to-date position on the various components of supply [**SMM30**].

126. The components of housing land supply detailed in Policy H2 as recommended to be modified above comprise completions (April 2018 to end March 2022), extant planning consents (commitments) on 1 April 2022, unconsented allocations in this Plan, the contribution from Swanage Local Plan allocations, Neighbourhood Plan allocations and sites in Bere Regis and Wareham, windfall sites and small sites (Policy H8 sites). We refer to each of these specifically below. The evidence was the most up-to-date available at the time of the consultation relating to the SMMs in November-December 2023.

### **Completions**

127. From the start of the plan period to the end of March 2022, a total of 483 net new homes were completed [**SMM30**].

### **Extant planning consents (commitments)**

128. As of 1 April 2022, 305 net new homes were expected to be delivered from sites benefitting from planning consent that are not otherwise allocations listed in Policy H2. Within the Purbeck area, most minor sites are built out within 2 years from the point of planning consent being granted. Accordingly, there is no reason to apply a lapse rate to minor sites that benefit from planning consent in terms of whether they are developable during the Plan period. The major sites with consent as of 1 April 2022 had been individually assessed for their likelihood of delivery with regard to the details of the site, input from developers, the discharge of conditions and the progress made towards implementation. In the light of the assessment that has been undertaken on a site-by-site basis and

the completions that have occurred to date, we are satisfied that it is neither necessary nor appropriate to apply a different discount rate to these sites. Therefore, subject to the recommended modification [**SMM30**] we consider this element of assumed supply for the plan period to be sound.

### **Unconsented allocations in this Plan**

129. The Council's approach to determining which sites to allocate for housing development in the Plan is detailed in the Housing Background Paper<sup>42</sup>. Having regard to the factors that were considered in the assessment process we consider that the approach adopted was robust, proportionate and consistent with national policy and guidance. The sites are suitably located in the context of the Plan's spatial strategy and subject to the modifications indicated elsewhere in this report have a reasonable prospect of being viably developed during the Plan period. Whilst there may be other sites which are also capable of being developed during the Plan period and suitably located in the context of the Plan's spatial strategy it is the Council's responsibility, informed by the results of consultation, to prepare the Plan. As indicated earlier in this report, the approach set out in the spatial strategy (Policy V1) is reasonable. Therefore, as the sites allocated in the Plan are consistent with it, and capable of being developed, we consider that they are soundly based. For clarity we recommend each of the site allocations be referred to individually in Policy H2 [**SMM30**].

130. The capacity, deliverability and timing of the allocated sites were considered in detail at the initial set of hearings and modifications to Policy H2 and the housing trajectory are required to reflect the updated evidence in this respect and thereby ensure that the Plan is justified and effective [**SMM29** and **SMM30**].

131. Our detailed consideration of the soundness of the allocated sites (Policies H4, H5, H6 and H7) is below.

### **Moreton Station / Redbridge Pit**

132. The site at Moreton Station/Redbridge Pit is located in the west of the area covered by this Plan. Part of the site was in recent use for sand and gravel extraction, the planning permission for which required the use to have ceased and the site to be restored by the end of December 2022 and therefore, it is developable for housing within the Plan period.

133. The site is close to the housing allocation at Wool (Policy H5) indicated in this Plan and the safeguarded strategic employment site at Dorset Innovation Park (Policy EE1) is located around 6 kilometres [km] to the east. It is also close to the existing and proposed housing development at Crossways which, at the time of the Plan's submission, was within the former West Dorset District

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<sup>42</sup> Document SD19

Council area but is now within the administrative area of Dorset Council. The site is close, as its name infers, to Moreton Station.

134. The site's location in relation to the Crossways developments provides the opportunity for residents of the new homes at Moreton Station/Redbridge Pit to access the existing infrastructure, services and facilities at Crossways and for infrastructure provision for the development in the two areas to be coordinated.
135. Policy H4 identifies the site for up to 490 new homes, a 65-bed care home, community facilities and supporting infrastructure. The wording of the policy and its supporting text in relation to the number of new homes to be provided requires amendment to provide flexibility and ensure consistency with national policy in relation to achieving appropriate densities and with other modifications in this report [**SMM33** and **SMM35**]. In addition, to ensure that the Plan is justified, the policy requires amending to reflect the updated evidence in relation to care accommodation in Purbeck, including that provided during the hearing sessions<sup>43</sup> [**SMM35**]. It is also necessary to clarify that delivery of the homes on the site will be phased, commencing after the expected date for the sand and gravel extraction to have ceased and the site restored [**SMM35**].
136. To ensure that the Plan is justified, effective and clear, the development requirements indicated in Policy H4 need to be modified to take account of up-to-date evidence including that provided during the hearing sessions in relation to viability and the needs of elderly people and people with disabilities in Purbeck<sup>44</sup>; the PPG which was updated during the examination of the Plan in relation to the needs of older and disabled people; the implications and the interplay between the policy and MMs referred to elsewhere in this report in relation to Policies H9, H10 and EE3; to reflect the findings of further investigation regarding the practicality of an off-road cycleway between Moreton Station and Dorset Innovation Park and the supporting evidence around improvements to the railway station<sup>45</sup>. In addition to ensure that the Plan is consistent with national policy and effective it should include a requirement to provide and manage in perpetuity an on-site SANG and off-site Heathland Support Area sufficient to avoid adverse impacts on the integrity of habitat sites from the development identified for the allocation and maximise biodiversity within the whole site. **SMM35** is necessary to address these matters.
137. The evidence indicates that the transport network in the area would be capable of accommodating the level of development proposed on the site and that there would be no material impact on highway safety. Moreover, the development requirements indicated in Policy H4 as submitted would require the submission of details of local road improvements/alterations including junction improvements, pedestrian and cycle access to Crossways and mitigation

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<sup>43</sup> Document SD115

<sup>44</sup> Document SD97, SD115, and SD117

<sup>45</sup> Document MMCD6

measures to address any impact of the development on the safety of the level crossing. **MM34** is, however, necessary to ensure consistency between the supporting text to Policy H4 and the policy as recommended to be modified by **SMM35**.

## Wool

138. The Plan identifies four housing allocation sites around the western edge of Wool. These comprise land to the west of Chalk Pit Lane and Oakdene Road; land to the north east of Burton Cross Roundabout; land to the north west of Burton Cross Roundabout and land to the north of the railway line. In total the sites cover an area of around 36ha.
139. Policy H5 indicates that the four sites would provide a total of 470 new homes, a 65-bed care home, community facilities and supporting infrastructure. The wording of the policy and its supporting text in relation to the number of new homes to be provided both overall at Wool and on the four individual sites requires amendment to provide flexibility, to ensure consistency with national policy in relation to achieving appropriate densities and with other modifications in this report [**MM36** and **SMM38**]. In addition, to ensure that the Plan is justified the policy requires amending to reflect the updated evidence in relation to care accommodation in Purbeck including that provided during the hearing sessions<sup>46</sup> [**SMM38**].
140. The evidence indicates that the transport network in the area would be capable of accommodating the level of development proposed and that there would be no material impact on highway safety. Moreover, the development requirements indicated in Policy H5 would require the submission of details of improvements to the local road network, a programme to reduce volumes of traffic on the A351 and mitigation measures to address any impact of the development on the safety of the level crossing. The development requirements would ensure the relationship between the proposed residential development and the various designated heritage assets close to the sites is satisfactorily addressed. The capacity in existing schools will need to be increased to support the demands arising from the level of proposed residential development at Wool and other community facilities and supporting infrastructure are necessary to support the level of proposed residential development<sup>47</sup>. However, the development requirements indicated in Policy H5 will ensure the necessary infrastructure to deliver services to support the needs of the local area.
141. To ensure that the Plan is justified, effective and clear, the development requirements indicated in Policy H5 need to be modified to take account of more up-to-date evidence including that provided during the hearing sessions in

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<sup>46</sup> Document SD115

<sup>47</sup> Document MMCD6

relation to viability and the needs of elderly people and people with disabilities in Purbeck<sup>48</sup>; the PPG which was updated during the examination of the Plan in relation to the needs of older people and disabled people; the implications and the interplay between the policy and MMs referred to elsewhere in this report in relation to Policies H9, H10 and EE3; and to reflect the infrastructure requirements of the local community, including the Parish Council, with regard to community facilities. In addition to ensure that the Plan is legally compliant, consistent with national policy and effective it is necessary to include a requirement to provide and manage in perpetuity a SANG to ensure avoidance of adverse effects arising from new homes in Wool on protected habitat sites. **SMM38** is necessary to address these matters and the effectiveness of development requirements that apply to all of the allocated sites indicated in Policy H5.

142. It is also necessary for effectiveness and consistency with national policy to refer to the added benefit provided by the SANG at Wool to enhance biodiversity as set out in **SMM38**. This is necessarily supplemented by identification of suitable opportunities for implementation of management at Coombe Wood (which includes Ancient Woodland) and for the heritage assets within the designated Scheduled Ancient Monument as set out in modifications to the supporting text to Policy H5 [**MM37**].

#### **Land to the west of Chalk Pit Lane and Oakdene Road**

143. The land to the west of Chalk Pit Lane and Oakdene Road is the largest of the four allocated sites around Wool. The development requirements indicated in Policy H5 will ensure that the effects of possible contamination from a pipeline on the western boundary of the site are avoided and/or mitigated.
144. To ensure that the Plan is justified in relation to the land to the west of Chalk Pit Lane, the policy requires amending as indicated above to reflect the updated evidence in relation to care accommodation in Purbeck; the most up-to-date evidence, including that provided during the hearing sessions in relation to viability and the needs of elderly people and people with disabilities in Purbeck; the PPG which was updated during the examination of the Plan in relation to the needs of older and disabled people; the implications and the interplay between the policy and MMs referred to elsewhere in this report in relation to Policies H9 and H10; and to reflect the infrastructure requirements of the local community, including the Parish Council, with regard to community facilities. In addition, for effectiveness so it is evident how a decision maker should react to development proposals, it is necessary to include the flexibility for achieving appropriate densities and to be clear that the requirements set out at part a-k of Policy H5 and other policies in the Plan apply. **SMM38** makes the necessary changes.

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<sup>48</sup> Document SD97, SD115, and SD117

### **Land to north east of Burton Cross Roundabout**

145. The land to the north east of Burton Cross Roundabout extends northward from Burton Cross Roundabout up to the railway line and based on Policy H5 as submitted would provide up to 90 new homes. There is no substantive evidence to indicate that the northern part of the site which is prone to flooding could not be sufficiently addressed by a flood risk management/mitigation scheme. In any event the development requirement included in Policy H5 regarding the provision of open space on the site would assist in the objective of managing risks from flooding as well as creating opportunities for sport and recreation. We are also satisfied that any effects of noise from the adjoining railway line could be suitably overcome and a suitable relationship of development to conserve the setting of nearby listed buildings could be achieved via the requirements of future proposals set out in Policy H5. However, for effectiveness so it is evident how a decision maker should react to development proposals, it is necessary to include the flexibility for achieving appropriate densities and to be clear that the requirements set out at part a-k of Policy H5 and other policies in the Plan apply. **SMM38** makes the necessary changes.

### **Land to the north west of Burton Cross Road Roundabout**

146. The land to the north west of Burton Cross Roundabout based on Policy H5 as submitted would provide up to 30 new homes. We are satisfied that a suitable proposal for development of the land would be capable of assimilating appropriately with its surroundings and that a suitable relationship to conserve the setting of nearby listed buildings could be achieved via the requirements set out in Policy H5. However, for effectiveness so it is evident how a decision maker should react to development proposals, it is necessary to include the flexibility for achieving appropriate densities and to be clear that the requirements set out at part a-k of Policy H5 and other policies in the Plan apply. **SMM38** makes the necessary changes.

### **Land to the north of the railway line**

147. The land to the north of the railway line lies to the south of East Burton Road and based on Policy H5 as submitted would provide up to 30 new homes. We are satisfied that a suitable proposal would be capable of integrating with the surrounding built environment, including opportunities for a new footpath link through the land between Sandhills Crescent and East Burton Road to be explored. Any effects of noise from the adjoining railway line could also be overcome and a suitable relationship of development to conserve the setting of nearby listed buildings could be achieved via the requirements of future proposals set out in Policy H5. However, for effectiveness so it is evident how a decision maker should react to development proposals, it is necessary to include the flexibility for achieving appropriate densities and to be clear that the requirements set out at part a-k of Policy H5 and other policies in the Plan apply. **SMM38** makes the necessary changes.

## **Lytchett Matravers**

148. The Plan identifies three housing allocation sites around the edge of Lytchett Matravers. These comprise land to the east of Wareham Road, land at Blaney's Corner and land to the east of Flowers Drove. All three sites are within the Green Belt and currently used for agriculture. We have considered the justification for removing the three housing allocations around the edge of Lytchett Matravers elsewhere in this report. We are satisfied that due to their individual size and position, the function and purposes of the Green Belt as defined in national policy would not be fundamentally undermined. Any harm in these respects would be outweighed by the contribution that the proposed residential development would make to meeting housing need in Purbeck.
149. There is no substantive evidence to indicate that any of the allocated sites at Lytchett Matravers are at risk from fluvial flooding from main rivers. In addition, the majority of each of the sites are at very low risk of flooding from surface water and those small parts of the sites that are at moderate/high risk from surface water flooding would not be developed. Therefore, we are satisfied that the sites would not be impacted by existing flooding from surface water through their lifetime.
150. Policy H6 indicates that the three sites would provide a total of 150 new homes as well as supporting infrastructure and community facilities. However, the wording of the policy and its supporting text in relation to the number of new homes to be provided overall at Lytchett Matravers and on the individual sites requires amendment to provide flexibility, to ensure consistency with national policy in relation to achieving appropriate densities and to ensure consistency with other modifications in this report [**MM39** and **SMM40**] including reference to the provision and management of a SANG totalling 7.6 hectares at Flower's Drove as indicated on the policies map to avoid the adverse effects from the new homes on European sites.

### **Land to the east of Wareham Road**

151. The land to the east of Wareham Road is positioned between existing homes on Burbidge Close and Glebe Road/Castle View Drive. There is an existing access through the western side of the site from Wareham Road. The site is some distance from the proposed SANG at Flowers Drove. Nevertheless, the future residents of the residential development proposed on this site would be able to satisfactorily access the SANG which will offer an alternative to using Wareham Forest. There is no substantive evidence to indicate that it would not be possible to achieve a layout that would not harm the living conditions of existing residents nearby and provide satisfactory living conditions for future occupants of the proposed housing.



### **Land at Blaney's Corner**

152. The land at Blaney's Corner would require the formation of a new access at an appropriate point around the north eastern corner of the site. However, there is no substantive evidence to indicate that it cannot be accessed satisfactorily or that the level of development proposed on the site would cause harm to highway safety. We have found previously in this report that there are no exceptional circumstances to alter the Green Belt beyond that which is being proposed in the Plan.

### **East of Flowers Drove**

153. The land to the east of Flowers Drove would require the formation of a new access at the eastern boundary of the site from Wimborne Road. However, there is no substantive evidence to indicate that it cannot be accessed satisfactorily or that the level of development proposed on the site would cause harm to highway safety.

154. To ensure that the Plan is justified, effective and clear, the development requirements for the housing development on all of the allocated sites at Lytchett Matravers need to be modified to take account of up-to-date evidence including that provided during the hearing sessions in relation to viability and the needs of elderly people and people with disabilities in Purbeck<sup>49</sup>; the PPG which was updated during the examination of the Plan in relation to the needs of older and disabled people; the implications and the interplay between the policy and modifications referred to elsewhere in this report in relation to Policies H9 and H10; and to reflect the requirements of the local community, including the Parish Council, and the findings of further investigation regarding the improvement of accessibility within Lytchett Matravers and its immediate surroundings<sup>50</sup>. In addition to ensure that the Plan is legally compliant, consistent with national policy and effective it is necessary to include a requirement to provide and manage in perpetuity a SANG. **SMM40** will address these matters.

### **Upton**

155. The Plan identifies a housing allocation site west of Watery Lane in Upton. Policy H7 indicates that the site would provide up to 90 new homes, community facilities and infrastructure. We have considered the justification for removal of the housing allocation from the Green Belt elsewhere in this report. In summary, we are satisfied that due to its individual size and position, the function and purposes of the Green Belt as defined in national policy would not be fundamentally undermined. Any harm in these respects would be outweighed by

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<sup>49</sup> Document SD97, SD115, and SD117

<sup>50</sup> MMCD6

the contribution that the proposed residential development would make to meeting housing need in Purbeck.

156. However, the wording of the policy in relation to the number of new homes to be provided on this site requires amendment to provide flexibility, to ensure consistency with national policy in relation to achieving appropriate densities and to ensure consistency with other modifications in this report [**SMM41**].
157. To ensure that the Plan is justified, effective and clear, the development requirements for the housing development on the site also need to be modified to take account of up-to-date evidence including that provided during the hearing sessions in relation to viability and the needs of elderly people and people with disabilities in Purbeck<sup>51</sup>; the PPG which was updated during the examination of the Plan in relation to the needs of older and disabled people; and the implications and the interplay between the policy and modifications referred to elsewhere in this report in relation to Policies H9 and H10. In addition, to ensure that the Plan is legally compliant, consistent with national policy and effective it is necessary to include a requirement to provide and manage in perpetuity a SANG. In the case of Upton an existing SANG which has already been formed to the east of the site has excess capacity to mitigate the effect from the number of homes proposed on this site. **SMM41** is necessary to address the above matters.
158. Subject to the modifications outlined above we consider the individual allocated housing sites in the Plan (Policies H4, H5, H6 and H7) to be soundly based.

### **Swanage Local Plan**

159. The Plan was adopted in 2017 with a plan period up to 2027 and whilst it plans for a total of 200 homes in settlement extensions, of those only 91 dwellings would contribute towards meeting Purbeck's housing need in the Plan period. Accordingly, it is necessary to update Policies V1 [**SMM5**] and H2 [**SMM30**], together with the supporting text [**SMM28**] in that respect in order to ensure that the policies are effective.

### **Neighbourhood Plan Allocations**

160. As indicated above, informed by local evidence emerging through the neighbourhood planning process, Policy H2 of the submitted Plan indicates figures for the Bere Regis and Wareham neighbourhood plan areas. The Bere Regis Neighbourhood Plan was made part of the development plan in June 2019 during the examination of this Plan and includes allocations to deliver the number of homes indicated in Policy H2.

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<sup>51</sup> Document SD97, SD115, and SD117

161. The Wareham Neighbourhood Plan was being examined at the same time as this Plan and has now been made. Policy H2 of the submitted Plan indicates a figure of 300 homes (including site allocations and windfalls) for the Wareham neighbourhood plan area. However, as indicated below, a windfall allowance is included in Policy H2 for the whole of the area covered by this Plan. Therefore, it is necessary to amend Policy H2 [**SMM30**] to avoid double counting in this respect and to reflect the expected contribution of 167 new homes to Purbeck's housing need in the Plan. This will ensure that the policy is effective.

### **Windfalls and small sites**

162. The housing supply identified in Policy H2 of the submitted Plan makes an allowance of 933 homes from windfall sites and, small sites next to existing settlements which are likely to come forward through the provisions of the small sites policy (Policy H8).

163. There is a long-standing pattern of relatively high and consistent levels of housing being delivered as windfalls within existing settlements in Purbeck. In this context therefore, we are satisfied that there is compelling evidence that such windfalls will continue to provide a reliable source of supply and that an allowance should be included in the Plan. Following the discussion at the hearing sessions and in the light of the most recent evidence regarding windfalls, adjustments are made to avoid double counting for the first two years from the April 2022 base date up to which completions and planning permissions granted are included in monitoring data (i.e. up to 2023/2024). The windfall allowance should, therefore, be a total of 596 dwellings for the plan period, based on a reduced total of 123 dwellings up to 2026/2027 and the remaining 473 dwellings to be provided up to 2034/35 (a rounded average annual rate of 59.1 dwellings per annum thereafter). The necessary changes to the windfall allowance are made for effectiveness in **SMM30**, including to separate out the respective totals for exception sites (47 dwellings) and relating to the small sites policy (139 dwellings).

164. As indicated above, in addition to windfalls, the Plan also provides for an allowance from development that would be delivered through the provisions of Policy H8. The policy seeks to introduce greater flexibility for the provision of homes next to existing settlements where under the existing policy framework (PLP1) they would not normally be permitted (other than as rural exception sites), in order to meet the area's housing requirement, as part of the overall spatial strategy of delivering growth across Purbeck and to provide an opportunity for small scale development to enhance/maintain the vitality of rural communities. As such its intention is not unreasonable.

165. However, as drafted the policy would provide for up to 30 homes on any small site adjacent to a settlement, regardless of either the settlement's position in the settlement hierarchy or the impact of the development, both individually and

cumulatively on individual settlements and protected habitat sites. Accordingly, to address these matters and ensure that the policy is consistent with both the spatial strategy of the Plan and national policy in relation to the Green Belt (to clarify that the policy only applies to land outside of it), Policy H8 and its supporting text requires modification [**SMM42** and **SMM43**]. The application of different thresholds to settlements depending upon their position in the settlement hierarchy, as indicated in **SMM43**, will ensure that developments are proportionate to the size and character of the settlement and provide greater direction to encourage sustainable patterns of development in rural areas. It is also necessary to clarify the relationship between Policy H8 and non-strategic policies in neighbourhood plans when assessing planning applications for new homes on small sites in areas with a made neighbourhood plan [**SMM43**]. **SMM42** and **SMM43** are also necessary to ensure that the Plan is legally compliant by ensuring that robust screening of likely significant effects is carried out and that appropriate mitigation is secured where appropriate if necessary for compliance with the Conservation of Habitats Species Regulations (as amended, or any equivalent relevant legislation or regulations).

166. Subject to modification [**SMM43**], we consider Policy H8 to be soundly based. However, given that the approach indicated in the policy has not previously been implemented, there are no past delivery rates to help inform the likely number of homes to be delivered under Policy H8. Nevertheless, from the discussions at the hearing sessions, the evidence<sup>52</sup> and having regard to the most up-to-date information, it is reasonable to assume that 139 dwellings would come forward from the provisions of the policy over the period of the Plan, subject to the identification and delivery of an ongoing pipeline of SANG/mitigation projects and the achievement of nutrient neutrality as part of development proposals. The number of homes to be delivered under Policy H8 is reflected in the table in Policy H2. Therefore, to ensure it is effective, Policy H2 should be modified to reflect the up to date figure [**SMM30**]. In addition, for clarity and effectiveness, the windfall allowance and small site allowance should be indicated separately in the table as recommended to be modified by **SMM30** within Policy H2.

167. National policy indicates that to promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare (unless it can be shown that there are strong reasons why this 10% target cannot be achieved). As recommended to be modified by **SMM30**, Policy H2 provides for around 14% of the housing requirement of Purbeck to be delivered by such sites through a combination of homes to be delivered through the Plan's small sites policy (Policy H8), homes to be delivered on small/medium size sites through neighbourhood plans and homes to be delivered from small/medium size sites with planning permission. In the interests of clarity and to ensure that the Plan is

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<sup>52</sup> Documents SD22, SD88 and Council's response to the Inspector's Question 4 of Matter E Issue 2

justified an explanation of this should be provided as a modification to the supporting text of Policy H2 and details of the sites should be included in an Appendix to the Plan to demonstrate compliance with the national policy requirement [**SMM28** and **SMM85**]. The availability of these sites will also mean that the Plan should be effective and consistent with national policy in ensuring land is available for people wishing to commission or build their own homes.

168. A consequential modification to the supporting text of Policy H2 is necessary to ensure consistency with national policy in relation to achieving appropriate densities and to provide flexibility [**SMM28**]. Consequential modifications are also required to the supporting text to Policy H2 [**SMM27**] and the housing trajectory [**SMM29**] to reflect the updated evidence relating to housing land supply, delivery and the phasing for allocated sites and thereby ensure that the Plan is justified and effective in this respect.

169. The Purbeck Local Plan, as recommended to be modified [**SMM30**], provides for 3,150 net new homes plus 130 extra care units. This is more than the minimum requirement of 2,976 homes indicated as necessary by modifications elsewhere in this report. It therefore provides for a buffer above the minimum requirement which will allow flexibility should some sites not come forward as anticipated.

### **5-year housing land supply**

170. Prior to the start of the hearing sessions the Council indicated that it could demonstrate 6.8 years housing land supply (2019-2024)<sup>53</sup>. This was based on a 5-year requirement that was calculated using an annual local housing need figure of 168 dwellings and took account of the shortfall of completions from 2018-2019 as well as applying a 10% buffer, as required by national policy if the local authority wishes to demonstrate a five-year supply through a recently adopted plan. At that stage the Council had indicated its wish to demonstrate and test the 5-year supply through the examination process in the Housing Background paper which was published alongside the pre-submission draft of the Plan at Regulation 19 stage<sup>54</sup>.

171. The 5-year requirement was further updated both during and after the hearing sessions, including to reflect the revised local housing need figure of 186 dpa (rounded) as referred to above, to update the position to the end of March 2021.

172. Updates to the 5-year supply were also more recently provided to reflect the up-to-date position on sites with consent up to the end of March 2022, together with updates to the likely contribution from local plan and neighbourhood plan

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<sup>53</sup> Document SD38a

<sup>54</sup> Document SD19

allocations<sup>55</sup>. The update also takes account of the removal of a windfall allowance until years 3 to 5 to avoid any double counting between windfall and consented sites, applies a cautious range of lapse rates for consents of between 5% - 10% and discounts to windfall allowance (including an additional year removed in areas within the Poole Harbour catchment). In addition, the updates remove any contribution from small sites as all such future sites that come forward will be counted as commitments for the purposes of 5-year supply calculations and none as yet have planning permission. In the light of the most up-to-date figures in terms of delivery, the evidence applies a 5% buffer (rather than the previous 10%) in calculations, taking into account that the Council are now not seeking to confirm a 5-year housing land supply through the Plan and the evidence in SD154 which indicates that the delivery of housing has not fallen below 85% of the Housing Delivery Test requirement in the previous three years.

173. The aforementioned evidence provides the latest reassessed 5-year housing land supply report of July 2023 (with a monitoring base date of 1 April 2022) taking account of the updated information referred to above and indicates around a 3.66 years' deliverable supply of housing. Based on this Council position, therefore, we envisage that it is unlikely that there would be an up-to-date supply of specific deliverable sites sufficient to provide 5 years' worth of housing land being provided upon adoption of the Plan. As detailed above, the Council in its most recent evidence has indicated that it does not wish to demonstrate and confirm its 5-year supply in the Purbeck area through the local plan examination process, which appears a reasonable change in position taking account of the acknowledged absence of an identified 5-year housing land supply, even if the minimum 5% buffer is applied.
174. Having regard to the above, we are mindful that the emerging Dorset Council Local Plan will address the 5-year housing land supply situation for the whole of the Council area, including Purbeck, and that **SMM1** as recommended elsewhere in this report indicates the timescale for the adoption of that Plan. We have made a necessary factual update to the modification to reflect the revised anticipated adoption date of 2027 as set out in the LDS published by Dorset Council in March 2024.
175. In the interim period, this Plan allocates land for housing on sites that are developable and there is no evidence to suggest that if the Plan were not to be adopted now, that more housing would be delivered in the next five years. Furthermore, whilst a 5-year housing supply may be able to be demonstrated if the housing requirement were to be otherwise staged or subject to significant downward adjustments in the early parts of the Plan, such an approach would likely result in fewer rather than more dwellings being constructed. This is noting that the consequences of the Council not demonstrating deliverable supply as

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<sup>55</sup> Document SMMCD4

required by the Framework would be that the presumption in favour of sustainable development would be applicable in decision-making on development proposals. In itself, this should help to boost housing supply. Consequently we conclude that the Plan, as proposed to be modified, is sound notwithstanding the likely absence of an identified 5-year housing land supply on its adoption.

## Conclusion

176. For the above reasons, and subject to the modifications outlined above, we conclude that the approach to the housing requirement and housing supply in the Plan is soundly based.

## Issue 7 - Are the various requirements relating to housing development, in addition to those indicated in the specific housing allocation policies justified, effective and consistent with national policy?

177. In addition to the site-specific development requirements set out in the housing allocation policies (Policies H4, H5, H6 and H7) and referred to in Issue 5, Policy H3 of the Plan sets out various additional requirements for new housing development proposals. The requirements set out in Policy H3 are intended, along with the site-specific requirements detailed above in Policies H4, H5, H6 and H7, to apply to all the housing sites allocated in the Plan. However, as drafted the policy refers in error also to Policy H8 (small sites). Therefore, for clarity and to ensure that the Plan is effective both the policy and its supporting text require amending in this regard [**SMM31** and **SMM32**]. **SMM31** is also required to clarify the relationship between Policy H3 and non-strategic policies in the Plan. **SMM32** also provides necessary clarification by broadening the potential mitigation of effects of allocated new homes in the Poole Harbour catchment beyond solely nitrogen to ensure consideration of other nutrient effects such as those arising from phosphates if necessary for compliance with the Conservation of Habitats Species Regulations (as amended, or any equivalent relevant legislation or regulations).

178. Subject to modifications set out elsewhere in this report the requirements of Policy H3 in relation to design, the delivery of affordable housing, the mix of housing, accessible and adaptable homes, landscaping, vehicular and pedestrian access, trees, drainage and sustainable modes of transport are justified, effective and consistent with national policy.

179. In the light of the recommended modifications (**SMM35**, **SMM38**, **SMM40** and **SMM41**) in relation to Policies H4, H5, H6 and H7 and to avoid duplication and ensure clarity, it is not necessary to refer again to the need for site specific habitat mitigation (SANGs). However, to ensure that the Plan is effective, justified and in accordance with Policy E9 as recommended to be modified

(**SMM21**), it is necessary to ensure that the effects of recreational activity and nutrients from the new homes in the Poole Harbour catchment, including as allocated at Lytchett Matravers and Upton, are mitigated if necessary for compliance with the Conservation of Habitats Species Regulations (as amended, or any equivalent relevant legislation or regulations). In addition, to ensure that the separate expectations for provision of suitable open space are sufficiently clear, it is necessary that the policy specifies that formal and informal recreation, sport and/or open space facilities are to be provided. **SMM32** makes the necessary changes to the new housing development requirements in Policy H3.

180. The requirement in Policy H3 to provide details of the infrastructure needed to achieve superfast broadband connectivity also requires clarification to ensure effectiveness. In addition to be both effective and justified the separate requirement for electrical vehicle charging points should be amended to provide flexibility due to the need to undertake site specific consultation with energy suppliers to ensure capacity in the existing electricity network and address the possibility that the allowance made in the viability assessment may not be sufficient to meet costs. The wording of the requirement in respect to biodiversity should also be amended to ensure it is consistent with national policy in terms of avoiding harm and securing net gains. **SMM32** provides the necessary changes. Also, it includes changes to clarify and ensure consistency with other modifications (**SMM35** and **SMM38**) recommended in this report in relation to the requirement for the extra care units at Moreton Station/Redbridge Pit (Policy H4) and Wool (Policy H5) to provide financial contributions towards education needs.

## Conclusion

181. Subject to the modifications outlined above, we conclude that the various requirements relating to housing developments, in addition to those indicated in the specific housing allocation policies, are justified, effective and consistent with national policy.

## Issue 8 - Does the Plan address the needs for all types of housing and the needs of different groups in the community?

### Housing mix

182. Informed by the SHMA and SHMA update<sup>56</sup>, Policy H9 of the Plan seeks to ensure a mix of homes is delivered to meet the needs of different groups in Purbeck in order to achieve mixed and balanced communities. However, to ensure that it is justified, effective and clear, a modification is required to the policy, to take account of updated evidence including that provided during the

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<sup>56</sup> Documents SD20 and SD21



hearing sessions in relation to viability and the needs of elderly people and people with disabilities in Purbeck<sup>57</sup>; the PPG which was updated during the examination of the Plan in relation to the needs of older and disabled people and its implications; and the interplay between the policy and modifications referred to elsewhere in this report in relation to the requirements of Policies H4, H5, H6, H7 and H10. To ensure the Plan is effective it is also necessary to clarify the relationship between Policy H9 and non-strategic policies in neighbourhood plans relating to the mix of different sizes and types of homes. **SMM45** addresses the above matters.

183. A modification is also necessary to the supporting text of Policy H9 to ensure it correctly reflects the housing mix indicated in the evidence<sup>58</sup> so that the policy is justified [**MM44**].

### **Affordable housing**

184. Affordable housing is a key issue within Purbeck. The evidence indicates that there is a net need of 149 affordable homes per year<sup>59</sup>. Therefore, to help address that need, Policy H11 of the Plan indicates the affordable housing requirements for new residential developments, including the residential elements of mixed-use schemes. It indicates that for sites of 10 homes or more (or more than 0.5 hectares inside settlements), 40% affordable housing is required on greenfield sites and 30% on brownfield sites. It also indicates that for both greenfield and brownfield sites of 2-9 homes, a 20% affordable housing contribution is required, except for the areas covered by Lytchett Minster, Upton and Wareham Town Councils. This requirement accords with national policy which indicates that policies for affordable housing may set lower thresholds for residential developments in designated rural areas. However, as drafted the policy lacks clarity and therefore, it is necessary to modify it in the aforementioned respects to ensure effectiveness insofar as how a decision maker should react to development proposals [**SMM47**].

185. The policy also indicates the mix and proportion of affordable housing provision required (social rented housing, affordable rented housing and affordable home ownership) as part of the overall affordable housing contribution from a site. To ensure that the Plan is effective it is necessary to clarify the relationship between Policy H11 and non-strategic housing policies in neighbourhood plans. Any flexibility afforded to neighbourhood plans to take account of local evidence relates only to the tenure mix of affordable housing rather than the overall proportions of affordable housing required [**SMM47**].

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<sup>57</sup> Documents SD97, SD115 and SD117

<sup>58</sup> Document SD20

<sup>59</sup> Documents SD20 and SD21

186. The requirements of Policy H11 are justified by the Council's Viability studies<sup>60</sup> and seek to maintain a balance between maximising affordable housing provision and ensuring the viability of the development. The policy also sets out what would be required if an applicant considers there are significant economic viability constraints that would prevent the requisite amount of affordable housing being provided thereby allowing some flexibility in this respect. However, as drafted it lacks some clarity and therefore requires further amendment in this regard [**SMM47**].
187. As submitted, Policy H11 also indicates that the requirements apply to all developments except where a specific requirement is stated in the allocation of the site. However, no specific requirements for affordable housing are indicated in the housing site allocation policies (Policies H4, H5, H6 and H7). We have made a necessary minor change to **SMM47** to address the above matter which is necessary to ensure that Policy H11 is clear to the decision maker, but does not affect its implementation.
188. Policy H12 of the Plan relates to rural exception sites for affordable housing to meet local community needs in rural areas as indicated in national policy. However, as drafted the scope of the policy and its supporting text lacks clarity. In addition, amendments to both the policy wording and its supporting text are necessary to ensure the precision and effectiveness of the policy in its implementation; to clarify the expectations around the balance between the mix of market and affordable homes that would be permitted on rural exception sites; to ensure consistency with other modifications in this report relating to residential development outside settlements; to encourage sustainable patterns of development and high quality design in accordance with national policy and to ensure legal compliance in relation to the requirements of the Habitats Regulations [**SMM48**, **SMM49**, **MM50**, **MM51** and **SMM52**].

### **Accessible and adaptable housing**

189. Purbeck is expected to see a notable increase in its older person population over the plan period. In addition, the proportion of its population with 'mobility problems' arising from health issues is likely to increase significantly<sup>61</sup>.
190. Evidence regarding the existing housing stock in Purbeck<sup>62</sup> indicates that most existing homes in the area are poorly designed for use by people with disabilities or long-term health problems that affect their mobility. It also indicates that 64% of the homes surveyed provide none, or only one of the

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<sup>60</sup> Documents SD35, SD36, SD37 and SD117

<sup>61</sup> Document SD21

<sup>62</sup> English housing survey 2012-13

visitability features that are a mandatory requirement of Building Regulations part M4(1).

191. To create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would meet an identified need for such properties. In addition, the PPG, which as indicated above was updated during the examination of the Plan, now places significant emphasis on meeting the needs of older and disabled people<sup>63</sup> and refers specifically to accessible and adaptable housing.
192. Policy H10 of the Plan as submitted is titled Part M of the Building Regulations. It indicates that the Building Regulations requirement M4(1) Category 1: Visitable dwellings will be applied to new homes. However, given that this is a mandatory requirement for all new homes it is not necessary to specifically refer to this element of the Building Regulations in the policy [**SMM46**]. The policy also seeks to ensure that on sites of 10 or more homes or with a site area greater than 0.5ha 10% of the new homes meet the optional requirement of Building Regulations M4(2) Category 2 as 'Accessible and Adaptable dwellings'. This is supported by the evidence of need and, whilst the viability evidence indicates that the optional technical standards of accessible and adaptable dwellings could be applied to 10% of dwellings on sites of over 10 units without impacting on overall viability, the policy provides for site specific considerations to be taken into account. The policy sets out what would be required if an applicant considers such factors would prevent its requirements being met although some further amendment is required to the wording in this respect for clarity as provided in **SMM46**.
193. The policy does not seek to require a specific proportion of new homes to meet the optional requirement of Building Regulations M4(3) Category 3: Wheelchair user dwellings, which is reasonable based on the evidence before us.
194. **SMM46** is necessary to address the matters referred to above to ensure clarity and effectiveness. It is also necessary to clarify and take account of the implications and interplay between Policy H10 and modifications referred to elsewhere in this report in relation to the requirements for accessible and adaptable dwellings on the housing allocations (Policies H4, H5, H6 and H7), to amend the title of the policy to more accurately reflect its scope and to clarify the relationship between strategic policies in the local plan and non-strategic policies in neighbourhood plans around the design of new homes and the requirements for accessible and adaptable homes.

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<sup>63</sup> PPG Reference ID: 63-001-20190626 to 63-019-20190626

## Gypsies, Travellers and Travelling Showpeople accommodation

195. The evidence indicates that there is a need for two additional pitches for gypsies and travellers and for four plots for travelling showpeople<sup>64</sup>. The Framework indicates that strategic policies should make sufficient provision for housing, this includes provision for gypsies, travellers and travelling showpeople. It also indicates that strategic policies should provide a clear strategy for bringing sufficient land forward including planning for and allocating sufficient sites.
196. The PLP1, which was adopted in 2012, did not address this and instead deferred the matter of identifying and accommodating the needs of gypsies, travellers and travelling showpeople to a joint Dorset gypsy and traveller development plan document [DPD]. The accommodation needs of gypsies, travellers and travelling showpeople was considered a strategic matter and the Dorset Councils have worked together with the original objective to prepare a joint DPD. However, this was not advanced to examination.
197. The Purbeck Local Plan does not include any site-specific provision to meet the accommodation needs of gypsies, travellers and travelling showpeople. Instead, it is proposed that this will be dealt with by the Dorset Council Local Plan and, in the meantime, covered by a criteria-based policy (Policy H15) in this Plan.
198. We are concerned that this provision has effectively been deferred leaving this matter unresolved since 2012. However, there now appears to be a firm commitment to addressing this matter in the LDS via the Dorset Council Local Plan. This will also allow the opportunity for the Council to address the needs of those people that were previously excluded from the planning definition of gypsies, travellers and travelling showpeople in the Planning Policy for Traveller Sites [PPTS] published in August 2015, which has now been reinstated in the revised PPTS published in December 2023. Furthermore, the identified need is relatively low and the positively worded criteria-based policy will potentially allow some of the need to be met in advance of the Dorset Council Local Plan.
199. Given the approach taken by the Council, attempting to resolve this problem during the examination would have caused further considerable delay to this Plan. Furthermore, it is likely to be quicker to secure the required site-specific provision through the Dorset Local Plan than it would be to delay adoption of this Plan to address the issue. Overall, therefore, there is no practical alternative at this stage. However, it is important that the provision is now addressed without further delay. **MM58** and **SMM59** clarify the position and ensure that a firm commitment is made to address the needs of gypsies, travellers and travelling showpeople in the forthcoming Dorset Council Local Plan. They are necessary to ensure that the Plan is justified and positively prepared. **SMM59**

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<sup>64</sup> Document SD19

and **SMM60** to Policy H15 and its supporting text are also necessary to ensure that the requirements of the Habitats Regulations are reflected in the policy.

### **Rural workers homes in the countryside**

200. Policy H13 of the submitted Plan relates to rural workers homes in the countryside. Amendments to both the policy and its supporting text are necessary to ensure that it is justified and effective in relation to the requirements of the Habitats Regulations [**SMM53** and **SMM54**].

### **Second homes**

201. Second home ownership affects different parts of Purbeck to differing degrees with higher proportions in the Dorset National Landscape, broadly to the south of the area covered by this Plan and associated with attractive and historic villages and towns. Around 91% of second homes in Purbeck are in the Dorset National Landscape and that proportion of second homes is significantly above national and regional levels.

202. The evidence<sup>65</sup> suggests that where the proportion of housing stock occupied as second homes is high the demand for further second homes may inflate house prices and affect affordability. It suggests that the proportion of second homes has an influence on access to existing housing stock for residents thereby negating the benefits that full time residents make to local communities and, whilst acknowledging that second homes can have some positive economic effect on the wider area, suggests that they can simultaneously cause damage to the community cohesion and social fabric of settlements and harm the viability of key local services. The impact of second home ownership is clearly a major concern for many communities across Purbeck as evidenced from both the representations received on the Plan and the discussion at the hearing sessions.

203. Policy H14 of the Plan seeks to restrict new housing permitted in the Dorset National Landscape, on small sites (as set out in Policy H8) and on rural exception sites (as set out in Policy H12) to be occupied only as a principal residence. It is intended to manage the number of new homes which are built as, or become, second homes to ensure that the housing needs of local people are met, to create a balanced mix of housing to allow people to live and work locally and to strengthen the community and local economy. As submitted the policy would apply to all new housing including changes of use to residential and replacement homes in the areas referred to above. It would not apply to holiday lets which are run as a business given their contribution, both directly and indirectly, to the tourism economy in the area.

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<sup>65</sup> Document SD23

204. Second homes are not a category of need for which the Framework advises that provision should be made, therefore the policy would not conflict with national policy in this respect. The evidence<sup>66</sup> suggests that restricting the occupancy of new homes in the Dorset National Landscape, on rural exception sites and small sites as referred to above would be highly unlikely to affect sales in the second homes market or be the cause of an increase in prices of the existing unrestricted stock. In addition, the viability evidence indicates that it would not have an adverse impact on viability or lead to the need to adjust affordable housing or CIL contributions. Consequently, there are not likely to be any negative implications of such a policy upon housing land supply and the restriction of second homes in the areas referred to above would be consistent with the purpose of the planning system in contributing to the achievement of sustainable development.

205. There is no substantive evidence to indicate that the scope of a restrictive policy beyond that intended by Policy H14 would be justified. However, to achieve the outcome sought it is not necessary, reasonable or proportionate to subject a single home that is proposed as a replacement home to the restriction of the policy, as the replacement of one unrestricted dwelling by another unrestricted dwelling would have no impact on the existing mix and balance of housing. Therefore, the submitted policy and its supporting text needs to be amended in this respect to be justified and to provide clarification on the application of the principal residence restriction to replacement homes [MM56 and MM57]. To ensure that the policy is effective further amendment to the policy is also necessary to clarify the position in relation to commercial holiday lets [MM57] and to its supporting text to clarify the definition of principal residence in relation to homes occupied by military personnel [MM55].

## **Conclusion**

206. Subject to the modifications indicated above, the Plan addresses the needs for all types of housing and the needs of different groups in the community.

## **Issue 9 - Is the approach to the provision of employment, retail and tourism development in the Plan soundly based?**

### **Need and Requirement for Employment Land**

207. The need and likely future requirement of employment land in Purbeck has been informed by various studies. The jointly commissioned Bournemouth, Dorset and Poole Workspace Strategy 2016 (the Workspace Strategy), undertaken for the Dorset LEP area, included a commercial property market review undertaken in consultation with local commercial property agents; a socio-economic context analysis to assess the performance of local labour

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<sup>66</sup> Document SD23

markets; and an assessment of employment land demand and supply<sup>67</sup>. Four possible growth scenarios, informed by projections from Cambridge Econometrics Local Economy Forecasting Model, were considered to determine the likely future requirement for additional employment land in the area - a Trend Scenario, a Planned Growth Scenario, an Accelerated Growth Scenario and Step Change Scenario.

208. The Workspace Strategy indicates that the Step Change Scenario is the most appropriate forecast on which to base development planning decisions because it reflects objectively assessed housing need across the area. It also sensibly recommends the inclusion of a 20% flexibility allowance in the employment requirement figure reflecting the comments received by commercial property agents and to ensure an adequate range and choice of employment sites available to the market. On this basis the Workspace Strategy indicates that the requirement for employment land to 2033 is 222.7 ha for the Eastern Dorset area, within which the area covered by this Plan falls. It also indicates that when balanced against an employment land supply of 276 ha there is a surplus supply over and above the projected requirement.
209. The Workspace Strategy concludes that there is adequate employment land supply in Eastern Dorset to meet current and projected market requirements for industrial development in relation to the Step Change Scenario with 20% flexibility, but this is dependent on minimising any net loss of employment land suitable to meet market requirements for office use.
210. Local housing need in Purbeck, as identified in Issue 3, is lower than that used in the Workspace Strategy (238 dwellings per annum). Therefore, it is not unreasonable to assume that the conclusions of the Workspace Strategy in relation to the sufficiency of employment land in Eastern Dorset remain broadly valid. In this respect it is also relevant that updated projections modelled in 2017 indicate projected jobs growth to be significantly lower than previously considered<sup>68</sup>.
211. The need for employment land has also been informed by an employment land need update produced in 2017 which relates purely to the former Purbeck District Council area<sup>69</sup>. This concludes that there is a need for between 8.8 - 8.9 ha of employment land in Purbeck to support growth over the Plan period. The Council indicates that it has sought to make further adjustments to these figures from the modelled scenarios and to plan for 11.5 ha employment land in order to support delivery at the same level anticipated in the PLP1; to reflect the comments of commercial agents; to support the wider growth of the LEP area; to provide the ability to respond to market changes; to reflect the work that has been undertaken to support sustainable economic growth in the Enterprise

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<sup>67</sup> Document SD26

<sup>68</sup> Document SD59

<sup>69</sup> Appendix 1 to Council's response to the Inspector's Question 1 of Matter G Issue 1

Zone at Dorset Innovation Park; and to support its strategy of encouraging growth at key employment sites.

212. The SoCG in relation to the DtC indicates that there is no evidence of unmet need from neighbouring authorities<sup>70</sup>. Accordingly, based on all the above, we consider that overall, the evidence underpinning the requirement for employment land for the period of the Plan is robust and soundly based.

### **Employment Land Supply**

213. There is an excess of available land remaining on existing employment sites to satisfy the required needs of the area covered by the Purbeck Local Plan. This is mainly concentrated at the two strategic employment sites (Holton Heath Trading Park and Dorset Innovation Park) which are located at either end of the Plan area. Dorset Innovation Park is located on the western side of the area covered by this Plan, to the west of Wool and east of Moreton Station / Redbridge Pit, where Policies H4 and H5 of the Plan allocate land for housing to help meet the area's housing needs. The Local Development Order for Dorset Innovation Park permits a range of employment uses on the site<sup>71</sup>. Holton Heath Trading Park on the other hand is located on the eastern side of the Plan area and closely related to the wider Poole and Bournemouth conurbation. It includes a number of established businesses including those in advanced manufacturing.

214. Other reasonable alternatives and potential additional employment sites were considered at earlier stages of the Plan preparation. However, given that there is sufficient employment land available to meet the requirement, the Plan does not allocate any additional employment sites to those identified in PLP1. Instead, Policy EE1 of the Plan seeks to retain and safeguard land at the two existing strategic employment sites, the importance of which are recognised in the Dorset Strategic Economic Plan published by the LEP as part of its overall strategy for supporting growth in the advanced manufacturing / engineering sectors, as well as several other existing identified employment sites.

215. The scale of the safeguarded employment sites varies thereby providing flexibility to accommodate the differing needs of employers. In addition, their distribution aligns broadly with the overall spatial strategy of the Plan, which is to spread development as much as possible, whilst recognising that development will necessarily be focussed in areas with fewer environmental constraints.

216. The overall approach to employment land in the submitted Plan is consistent with the Framework in so far as it will serve to support the existing well utilised employment sites; support the wider growth of the LEP area; provide flexibility

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<sup>70</sup> Document SD09

<sup>71</sup> Document SD128



to respond to changes in economic circumstances and to accommodate needs not currently anticipated in the Plan and support the work already undertaken (including the preparation of a local development order) to create the conditions necessary to support sustainable economic growth in the Enterprise Zone at Dorset Innovation Park.

217. Since the submitted version of the Plan was published, some changes have occurred which result in alterations/corrections to the figures relating to the total size and the estimated remaining availability of land on the employment sites indicated in Policy EE1.

218. The total extent of the site at Dorset Innovation Park has been reassessed to take account of more recent information and the need to provide for habitat restoration. In addition, the Council indicates that it can no longer justify safeguarding the extent of land at Dorset Innovation Park indicated in the policy as some of the land is still being used for alternative uses and is not likely to be available within the Plan period. The total size and the estimated remaining availability of land on the safeguarded site at Bere Regis (Townsend Business Park) has been confirmed through the Bere Regis Neighbourhood Plan. Furthermore, work undertaken since the submission of the Plan indicates that the devolved housing requirement for the Wareham Neighbourhood Plan is capable of being met through the removal of only some of the employment land at Westminster Road and Johns Road currently safeguarded for employment uses by policies in PLP1<sup>72</sup>. Accordingly, **SMM61** and **MM62** are necessary to Policy EE1 to reflect the up-to-date position on employment land supply and ensure that the Plan is justified and effective in these respects. The policies map will need to be amended accordingly to ensure accuracy and consistency.

219. **SMM61** also includes a change to ensure that the policy is clear, unambiguous, and effective in so far as it reflects the changes to the UCO resulting from the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

220. Policy EE2 of the Plan seeks to direct new employment development to the safeguarded employment land identified in Policy EE1 or other suitable locations in accordance with the spatial strategy (Policy V1) whilst also providing some flexibility for employment development to assist rural regeneration and rural diversification. It sets out the requirement to regularly monitor the supply of employment land and need for employment land over the plan period and provides flexibility by setting out the circumstances where alternative uses on existing employment land may be permitted.

221. As drafted, the scope of Policy EE2 in relation to safeguarded and other employment land lacks clarity. Furthermore, in setting out the requirements for

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<sup>72</sup> Document SD118

employment development to be supported in rural areas it is necessary to ensure that the effects of development proposals on biodiversity are taken into account and that the requirements of the Habitats Regulations are reflected in the policy. Therefore, to address these matters and ensure that the policy is consistent with national policy, legally compliant, justified and effective it requires further modification [**SMM63**].

222. **SMM63** also includes a necessary change to ensure that the policy is clear, unambiguous, and effective in so far as it reflects the changes to the UCO resulting from the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. In addition, it provides required certainty of the approach to decision making for proposals for waste management infrastructure on safeguarded employment land.

### **Retail development**

223. The Poole and Purbeck Town Centre Retail and Leisure Study (2014) (the Retail and Leisure Study) has informed the retail policy of the Plan. It covered a wide area encompassing all of the area covered by this Plan but also that covered by the then Poole Borough Council, as well as parts of East Dorset, North Dorset, West Dorset and Bournemouth. The Retail and Leisure Study sets out the need for additional retail floorspace in the study area over the course of the study period to 2031 based on traditionally used formulae and identifies a need for a total of an additional 2,750 sq. m (net) retail floor space in Purbeck comprising 950 sq. m of comparison retail floorspace and 1,800 sq. m of convenience retail floorspace.
224. The adopted Swanage Local Plan has subsequently allocated 2,100 sq. m of retail floor space (1,000 sq. m of comparison retail floorspace and 1,100 sq. m of convenience retail floorspace) thereby providing for all the additional comparison retail floorspace identified as needed within the Retail and Leisure Study in Purbeck. However, there remains a need for an additional 700 sq.m (net) of convenience retail floorspace to be provided.
225. The Retail and Leisure Study indicates that the larger centres in Purbeck (Upton, Swanage and Wareham) have a good range of shops and low vacancy rates. Therefore, informed by the findings of the Retail and Leisure Study and given the relatively low outstanding need for additional convenience retail floorspace in Purbeck combined with the importance placed by the Council in retaining the vibrancy of its town and local centres, the approach taken in the Plan to provide the additional convenience retail floorspace required at the two largest housing site allocations (Wool and Moreton Station/Redbridge Pit) is a credible one. It will enable a local provision of convenience retail development to serve the residents of these allocations. However, as currently worded that part of Policy EE3 of the Plan which seeks to define the policy requirement regarding convenience retail floorspace and its location lacks clarity thereby

reducing its effectiveness. **SMM65** provides the necessary changes to specify the requirement for provision of 350 sqm of additional convenience floorspace at both Moreton Station/Redbridge Pit (Policy H4) and Wool (Policy H5).

226. Policy EE3 seeks to ensure that retail development in Purbeck is managed in accordance with the overall spatial strategy of the Plan and the settlement hierarchy. However, further clarification is required to the detailed wording of the policy to clarify the Council's objectives in this respect. The policy identifies a hierarchy of town and local centres for the Plan area as required by national policy. Whilst the hierarchy differs to that set out in the Retail and Leisure Study by the inclusion of Upton as a town centre and Bere Regis and Lytchett Matravers as local centres, it reflects the settlement hierarchy which, as indicated above, remains essentially unchanged from PLP1. Upton is a significant town centre with several existing shops and the delivery of retail uses within the town would contribute positively to the overall sustainability of the locality. In addition, the centres of Bere Regis and Lytchett Matravers each play an important role in delivering services for the local community. Accordingly, we are satisfied that the hierarchy as indicated in Policy EE3 of the Plan is justified.

227. Policy EE3 also indicates the circumstances where out of town proposals for main town centre uses will be permitted, requiring a sequential approach to be taken in the identification of suitable sites and setting a local floorspace threshold based on proportionate evidence informed by the Retail and Leisure Study in accordance with national policy. In addition, also informed by the Retail and Leisure Study, the policy seeks to allow for the market to respond to changing needs by permitting the loss of town centre uses when specific criteria are met. However, it is also necessary to ensure that the requirements of the Habitats Regulations are reflected in this part of the policy and that the specific wording of the policy is consistent with national policy.

228. Having regard to the above and to address those matters identified, **SMM65** is necessary to ensure that Policy EE3 is consistent with national policy, legally compliant, justified and effective. **SMM65** also includes a change to ensure that the policy is clear, unambiguous, and effective in so far as it reflects the changes to the UCO resulting from the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

229. **SMM64** is also necessary to provide the up-to-date position on the Wareham Neighbourhood Plan in the supporting text to Policy EE3 and to reflect that it was made in November 2021.

## Tourism

230. Tourism is important to the economy of the whole of the South West region. As indicated above, tourism related employment is significant in Purbeck, totalling around 21% of the workforce. However, whilst tourism is clearly an important

sector of the local economy its growth raises challenges for the environment and local communities.

231. Policy EE4 seeks to ensure that tourism related development takes place in a sustainable manner to ensure positive benefits whilst avoiding adverse impacts on the local environment or existing infrastructure. However, the policy needs to be modified to reflect the spatial strategy of the Plan more accurately, to be consistent with national policy and to reflect the requirements of the Habitats Regulations. **SMM66** is necessary in these respects.

## Conclusion

232. Subject to the modifications indicated above, the approach to the provision of employment, retail and tourism development in the Plan is positively prepared, appropriate to the needs of the area and is, thus, soundly based.

## Issue 10 - Are the Plan's policies in relation to protected habitats soundly based and is the need for the avoidance and mitigation of the impacts of new residential development upon Dorset Heaths habitat sites and Poole Harbour sufficiently addressed?

### Protected habitats

233. The area covered by the Purbeck Local Plan includes some of the most special and heavily protected environments in the country and has a wealth of biodiversity and geodiversity of international, European and national importance. Policies E7 (Conservation of protected sites), E8 (Dorset Heathlands) and E9 (Poole Harbour) of the submitted Plan have been developed through close working with Natural England.

234. Policy E7 of the Plan is an overarching policy which seeks to ensure the conservation of national, European and international protected nature conservation sites. **SMM19** is necessary to ensure that the policy is effective, consistent with Policies E8 and E9 and reflects the requirements of the Habitats Regulations.

235. **SMM14** and **SMM15** are necessary to ensure that full details of protected sites within the Plan area are provided by adding references to the St Alban's Head to Durlston Head and Isle of Portland to Studland Cliffs SACs. **SMM14** also necessarily adds clarification that the statutory protection is in the form of national regulations, legislation and where relevant, European law in the supporting text.

## Heathland Protection

236. Policy E8 of the Plan seeks to address the potential impacts of development on designated heathlands SPAs and SACs. The Council has an established strategy prepared jointly with the neighbouring Bournemouth, Christchurch and Poole Council for the avoidance and mitigation of the impacts of new residential development upon Dorset Heaths<sup>73</sup>. The approach in the strategy which relies on restrictions on development within 400 metres of the heathland area and mitigation associated with some types of development between 400 metres to 5km of heathland is set out in Policy E8 of the Plan. The approach to mitigation within the wider 400 metres to 5km area comprises strategic access management and monitoring (SAMM) and heathland infrastructure mitigation projects (including SANG and heathland support areas).

237. To ensure Policy E8 is effective and justified in relation to the Habitats Regulations the policy requires modifying to outline the need to screen for likely effects from any new development around Dorset Heathlands and Corfe Common, and the requirement for any adverse effects on the integrity of the habitat site to be avoided. This includes the necessary addition of requirements in relation to air quality. It is also necessary to provide clarification of the considerations to be applied when assessing planning applications within a 400-metre area of Corfe Common, which is a SAC, Ramsar site and SSSI but not a SPA [**SMM20**].

238. To ensure consistency with **SMM20**, associated updates to the policies map should indicate the extent of 400 metres and 5 kilometres from the edges of the Corfe Common habitat site. It should also indicate the Heathland Support Areas which form an important part of the Council's habitat site mitigation strategy.

239. Amendment to the supporting text is also necessary for effectiveness to clarify Natural England's position in relation to the findings of the HRA regarding the Dorset heathlands [**SMM15**]. It is also required to provide further clarification, and context, on the strategy for mitigating the effects of residential development on the Dorset heathlands, together with detailing the Council's commitment to develop an interim air quality strategy and deliver mitigation to avoid adverse impacts arising from vehicle emissions [**SMM16**]. For clarification it is also necessary to explain the rationale for the difference in approach between Corfe Common and other protected heathlands in the supporting text [**SMM18**].

## Avoidance and mitigation of the impacts of new residential development upon Dorset Heaths habitat sites

240. Suitable and deliverable heathland mitigation projects have been identified to mitigate against the impact of residential development proposed by the housing

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<sup>73</sup> Dorset Heathlands Planning Framework 2020-2025 (adopted as SPD in April 2020)

allocations in the Plan (Policies H4, H5, H6 and H7). These are supported by Memorandums of Understanding [MoUs] between the Council, Natural England and the developers/landowners. However, further amendments are necessary to Policies H4, H5, H6 and H7 to ensure clarity around the requirement to provide SANG [**SMM35**, **SMM38**, **SMM40** and **SMM41**]. The policies map will need to be changed accordingly. It is also necessary for clarity to refer, in the supporting text to Policy H5, to the added benefit provided by the SANG at Wool to enhance the biodiversity of Coombe Wood (ancient woodland) [**MM37**] which is justified by the evidence before us.

241. The neighbourhood plans at Wareham and Bere Regis specifically identify habitat site mitigation to support the residential development proposed in the Plan for the designated neighbourhood areas. In addition, SANG has been identified and secured to support the residential development proposed in the adopted Swanage Local Plan.
242. The Plan as submitted also identifies land for use as a strategic SANG and holiday park at Morden Park (Policy I5) as set out earlier in the report. However, as also referred to previously, there are potential alternative opportunities for the delivery of the strategic SANG which should be fully explored. The alternatives for delivery of the strategic SANG include the potential for compulsory purchase order as a last resort in the event that an agreement with landowners cannot be reached. In such circumstances, enabling development in the form of a holiday park and any alterations to Green Belt boundaries that may otherwise be required to facilitate such an allocation in the Plan are not justified.
243. In the light of the current uncertainty in terms of how and when delivery of a strategic SANG would occur, the Council intends to adopt an interim approach to habitat site mitigation for the period until the anticipated adoption of the Dorset Council Local Plan in 2027. In that respect, the Interim Mitigation Strategy [IMS] would ensure that the impact of planned and unplanned growth on Dorset Heaths habitat sites are effectively mitigated and that the Council's wider obligations around the conservation of these habitats are supported<sup>74</sup>. The IMS is supported by a MoU between the Council and Natural England and several other MoUs between the Council and various landowners<sup>75</sup>.
244. With regard to the above, **SMM16** includes the necessary changes to the Plan including an explanation of the IMS and the associated update on interim projects (November 2022). The modification includes an accompanying table setting out the priority mitigation projects at Wild Woodbury Heathland Infrastructure Project, Bere Regis; an extension to French's Farm SANG, Upton; and securing excess mitigation capacity from Flowers Drove SANG, Lytchett

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<sup>74</sup> Document SD146

<sup>75</sup> Documents FMMCD 4. a); FMMCD 4. b); FMMCD 4. c); FMMCD 4. d) and FMMCD 4. e)

Matravers. When taken together these have an estimated mitigation capacity for around 680 new homes.

245. There remain some significant uncertainties with respect to the approach to habitat site mitigation being proposed by the Council through the IMS and the projects that may come forward in advance of the adoption of the Dorset Local Plan as set out in **SMM16**. Nonetheless, the approach is a pragmatic one, particularly given the stage reached in the examination process and in the light of the timescale for the adoption of the new Local Plan for the Dorset Council area.
246. The Council in **SMM16** have also indicated an intention to continue to monitor planning permissions for development within 5km of the Dorset Heaths and progress on the delivery of the priority mitigation projects identified in the IMS and assess their mitigation capacity, together with the development of other mitigations projects listed in the evidence and the identification of new projects if necessary. Such an approach would appear to provide some contingency in the event of delay to the new Plan. We are also mindful that, as part of the Dorset Council Local Plan, the Council indicates that it will be reviewing its approach to mitigating the effects of development on Dorset Heaths habitat sites across the whole of the new Council area. In such circumstances, to attempt to resolve the issue of habitat site mitigation beyond the interim period suggested by the Council would be likely to cause further undue delay to this Plan and would thereby undermine the objective of getting an up-to-date Local Plan in place and associated benefits to housing delivery within its allocations.
247. In the light of all the above, therefore, amendments are also necessary to Policy I5 and its supporting text [**SMM76 and SMM77**] to clarify that the Council will seek delivery of a strategic SANG at Morden independently of a holiday park and to clarify the intended approach to mitigate the impact of residential development in the interim period. These modifications will ensure that the Plan is effective, justified, consistent with national policy and legally compliant in relation to the Habitat Regulations. The policies map will need to reflect these modifications. Amendment to the monitoring framework is also necessary to ensure that the delivery of SANG or alternative mitigation is monitored [**SMM82**].

## Poole Harbour

248. Policy E9 seeks to address the potential impacts of development on the Poole Harbour SPA, Ramsar site and SSSI. However, to ensure it is effective and justified in relation to the Habitats Regulations, the policy requires amendment to clarify the requirement to screen for likely effects of new development within the drainage catchment for Poole Harbour and in a recreational zone around the Harbour. It is also necessary to include reference to the requirement for any adverse effects on the integrity of the habitat site to be avoided and to clarify the

approach to recreational effects. **SMM21** provides the required changes. **MM17** is also necessary to ensure that the reference to the Poole Harbour Recreation SPD in the supporting text is up-to-date.

249. On 16 March 2022, a Written Ministerial Statement [WMS] on Nutrient Levels in River Basin Catchments was issued by the Secretary of State for Environment and Rural Affairs. The WMS, amongst other things, signalled a change in approach to the assessment of development proposals in river catchments where water bodies that are protected sites under the Habitats Regulations are in unfavourable condition due to nutrient pollution. As a result of this change several authorities, including Dorset Council, were listed as having protected water bodies affected. Poole Harbour is one of the waterbodies identified where increases in nutrient loading (both phosphorus and nitrogen pollutants) within its catchment is considered to be contributing to its unfavourable condition.

250. In response to the aforementioned situation, the Levelling Up and Regeneration Act 2023 has introduced new requirements that apply to certain sewage disposal works. It allows the Secretary of State to designate catchment areas for certain habitats sites polluted by nitrogen and/or phosphorus. It also requires sewerage undertakers to ensure that treated effluent from sewage disposal works in England that discharge into the designated catchments will, unless exempted, meet specified standards for the removal of nitrogen and/or phosphorus from wastewater by the applicable 'upgrade date'. The 'upgrade date', in relation to a nutrient significant plant, is either 1 April 2030 (if the designation of the associated catchment area takes effect during the initial period of 26 January 2024), or a date to be specified (at least 7 years after the designation date) if the designation of the associated catchment area takes effect after the end of the initial period.

251. With regard to the above, the Government published a notice of designation of sensitive catchment areas on 25 January 2024 which included the Poole Harbour SPA/Ramsar as both a nitrogen sensitive catchment area and a phosphorus sensitive catchment area. It is considered that the associated requirement to upgrade sewage disposal via wastewater treatment works will provide suitable mitigation for nutrient pollution issues affecting the SPA/Ramsar during the Plan period and thereby, provide capacity for the scale of development planned for in the Purbeck area by 2034. However, to complement this and ensure deliverability of development in the shorter term, the Council have been working with Natural England to develop a nutrient neutrality methodology and the Council have also committed to review and update its strategy in the Nitrogen Reduction in Poole Harbour Supplementary Planning Document (April 2017). There is also potential for investment via Natural England into specific schemes for nutrient mitigation such as creation of new wetlands. It is reasonable to conclude that the combination of those changes will lead to a shift in approach for mitigation of increased nutrient loading, together with an evolution of nutrient mitigation schemes and



associated credit markets available to landowners and developers to potentially offset the effect of their proposed developments.

252. It follows that in view of the above situation and the progress made by the Council to date that we are satisfied that developers will have sufficient options available to ensure the delivery of housing within the Poole Harbour catchment in accordance with our findings under Issue 6. We are also satisfied that this can be achieved without adverse effects on the integrity of the Poole Harbour SPA/Ramsar, alone or in-combination. However, in reaching that view we have taken into account that the Plan and specifically Policy E9 as submitted are not sound in that respect. The policy has shortcomings insofar as it relates to only nitrogen pollution and does not require that development proposals which would result in an increase in nutrient loading within the Poole Harbour catchment demonstrate appropriate avoidance/mitigation measures so as not to have an adverse effect on the integrity of the SPA/Ramsar.
253. **SMM21** provides the necessary clarification in Policy E9 by broadening the mitigation of effects of allocated new homes, tourist accommodation or a tourist attraction beyond solely nitrogen to ensure consideration of other nutrient effects such as those arising from phosphates. The modification ensures that the approach more fully reflects the requirements of the Habitats Regulations; and is consistent with other modifications in this report.
254. **SMM86** also provides further necessary changes to the supporting text for effectiveness to set out the expectations of applications for development that would increase nutrient loading. It also includes the methodology for calculation of nutrient loads arising from residential development, clarification of the effects including the influence of raised levels of phosphorus, identifies that wastewater and agricultural processes are contributing to the growth of algal mats in the harbour and sets out the amount of mitigation if required. It also indicates that mitigation could be achieved through on-site measures, by working with third parties or the Council to secure nutrient mitigation. Since the SMM consultation there has been a change in status of the Levelling Up and Regeneration Act and we have necessarily updated the wording of the modification accordingly.
255. To supplement those modifications and the effectiveness of the Plan in those respects, the policies map should be updated to indicate the drainage catchment for Poole Harbour and the recreation zone around the harbour.

## Conclusion

256. Subject to the modifications indicated above, the Plan's policies in relation to protected habitats are soundly based and the need for the avoidance and mitigation of the impacts of new residential development upon Dorset Heaths habitat sites and Poole Harbour is sufficiently addressed and soundly based.

## **Issue 11 - Are the Plan's policies in relation to the landscape, historic environment, renewable energy, sustainable drainage systems (SuDs), coastal management areas, biodiversity and geo diversity, and design soundly based?**

### **Landscape**

257. As indicated previously, large parts of the Purbeck area are designated as part of the Dorset National Landscape and the Dorset and East Devon Coast WHS. Policy E1 sets out the considerations to be applied in the assessment of proposals within or affecting these areas as well as non-designated landscapes. However, to ensure consistency with national planning policy which treats WHSs as designated heritage assets, the references to the WHS should be removed from this policy and incorporated into Policy E2 [**MM9** and **MM11**]. Further modification to Policy E1 is necessary to ensure that it is consistent with national policy, in relation to the weight which should be attached to conserving and enhancing the landscape and scenic beauty of the National Landscape when taking decisions on planning applications and to provide further direction for decision makers around assessing the impacts of development on visual character [**MM9**].

258. **SMM8** is also necessary for effectiveness to clarify that the heritage coast overlaps with part of the Dorset National Landscape in the supporting text to the policy.

### **Historic Environment**

259. Policy E2 sets out the considerations to be applied in the assessment of proposals affecting the historic environment. However, as a consequence of **MM9** and to ensure consistency with national planning policy, Policy E2 and its supporting text should include reference to the Dorset and East Devon Coast WHS [**MM10** and **MM11**]. We have made a change to the wording of these modifications to that which was consulted upon to ensure that the correct title of the WHS is used throughout the Plan. We are satisfied that this change does not undermine the consultation process.

### **Renewable Energy**

260. Policy E3 encourages the use and supply of renewable and low carbon energy and sets out the considerations to be applied in the assessment of such development proposals. However, **MM12** is necessary to ensure that the terms of the policy are not inconsistent with the Habitats Regulations and to ensure consistency with other relevant policies of the Plan.

### **Sustainable drainage systems (SuDs)**

261. Policy E5 indicates the considerations that should be taken account of in the design of SuDs, where these are needed. However, to be consistent with national policy and in turn contribute towards the objective of achieving sustainable development, it should also refer to opportunities for maximising biodiversity benefit [MM13].

### **Coastal change management areas (CCMAs)**

262. Policy E6 indicates the considerations that should be taken account of in the determination of planning applications in CCMAs. The CCMAs were not accurately indicated on the Policies Map. Accordingly, the Policies Map will need to be updated to accurately indicate the CCMAs and ensure the effectiveness of Policy E6.

### **Biodiversity and Geodiversity**

263. Policy E10 sets out the considerations to be applied in the assessment of proposals that affect important national and local biodiversity and geodiversity sites, including priority species and irreplaceable habitats, separately from European and internationally protected sites and species. It generally provides an appropriate policy framework to assist the delivery of net gains for biodiversity, including the mandatory requirements as enacted by the Environment Act 2021. However, to ensure consistency with national policy it is also necessary to refer to the considerations to be applied to development resulting in the loss or deterioration of Ancient Woodland and veteran trees. In addition to ensure its effectiveness it is necessary to amend the policy to clarify that, within areas that support nationally significant numbers of Annex 1 bird species, there is a need to demonstrate that there is no significant effect upon both the species and their functionally linked habitats [MM23]. The Policies Map should also be updated to indicate local nature reserves.

264. **MM22** is also necessary for effectiveness to provide clarity and context for Policy E10 in the supporting text.

### **Design**

265. Policy E12 identifies various measures that are necessary to achieve high quality design. In addition, the supporting text refers to a number of other documents, including a design guide for the Purbeck area, which build upon and provide more detailed advice and guidance on interpreting Policy E12. Whilst these documents predate the publication of the National Design Guide and National Model Design Code, the Plan does not preclude consideration of these in conjunction with the Purbeck Design Guide in decision making. Accordingly, we are satisfied that Policy E12 is consistent with national policy. However, to ensure the Plan is effective it is necessary to clarify the relationship between

Policy E12 and non-strategic design policies in neighbourhood plans [SMM24] and for certainty include the guidance document titles in Appendix 1 [SMM84].

## Conclusion

266. Subject to the modifications indicated above, the Plan's policies in relation to the landscape, historic environment, renewable energy, sustainable drainage systems, biodiversity and geo diversity and design are soundly based.

## Issue 12 - Are the Plan's provisions for improving accessibility and transport soundly based?

267. The Framework indicates that transport issues should be considered from the earliest stages of plan making. The Purbeck Local Plan has been informed by various transport modelling studies commissioned throughout its development<sup>76</sup> along with site specific studies undertaken by some site promoters. The studies, which assessed the likely transport impacts of higher levels of development than that proposed in the Plan, concluded that whilst there would be an impact on the road network, it would not be severe. Accordingly, it follows that the impact of the levels of development indicated in the Plan would also not be severe. On this basis, therefore, whilst the policies and proposals of the Plan would inevitably have some impact on the road network, it is unlikely that individually or cumulatively any of the proposed development would give rise to severe adverse traffic impacts so as to warrant the Plan being considered unsound.

268. There is no substantive evidence that the transport modelling in the studies referred to above is not credible. More detailed traffic impact work of the development proposed in the housing allocations at Moreton Station/Redbridge Pit and Wool, including the impact on the safety risk at the level crossings at these locations, and other development proposals will need to be undertaken at the planning application stage. The Plan (Policies H4, H5 and I2) provides for this and for the implementation of any necessary mitigation measures. Accordingly, having regard to all that we have read and heard, we are satisfied that the transport modelling work undertaken is sufficiently robust and proportionate to the preparation of a local plan.

269. Policy I2 of the submitted Plan outlines the Council's priorities for transport and in support of these seeks to ensure that development proposals are located in the most accessible locations so as to reduce the need to travel, provide access to local services and facilities by sustainable modes of transport, mitigate against the impacts of additional traffic, provide adequate parking, make

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<sup>76</sup> Documents SD100, SD101, SD102, SD103, SD104, SD105, SD106, SD107, SD108, SD109 and SD110

provision for new electric vehicle charging points and provide the infrastructure required for high speed electronic communications.

270. In order to ensure the Plan is effective it is necessary to indicate the evidence that would be required in cases where there is no provision of high-speed electronic communications locally and/or its provision would significantly impact on the viability of the development and to clarify the relationship between Policy I2 and non-strategic policies in neighbourhood plans relating to vehicle parking [**SMM71**].

## Conclusion

271. Subject to the modifications above, we conclude that the Plan's provisions for improving accessibility and transport are soundly based.

## Issue 13 - Are the Plan's policies in relation to green infrastructure, trees and hedgerows; recreation, sport and open space; health and social care facilities and community facilities soundly based?

### Green infrastructure, trees and hedgerows

272. Policy I3 provides a framework for protecting and strengthening the green infrastructure network in Purbeck consistent with national policy. Paragraph 250 of the supporting text indicates that new development should incorporate replacement and additional planting of trees and hedgerow. However, to ensure that the policy is effective and consistent with national policy it is necessary to include this provision within the policy. In addition, to ensure that the Plan is effective it is necessary to clarify the relationship between Policy I3 and non-strategic policies in neighbourhood plans relating to local green space. Accordingly, **MM73** is necessary in these respects. A modification is also necessary to clarify the relationship between the policy and non-strategic policies in neighbourhood plans relating to local green space in the supporting text of the policy [**SMM72**].

### Recreation, sport and open space

273. Policy I4 is a multi-faceted policy which deals with the requirement for residential development to provide new recreation, sport and open space facilities, the safeguarding of existing facilities and the provision of replacement facilities. The wording of that part of the policy that deals with new recreation, sport and open space facilities requires some amendment to ensure consistency with **SMM32** and to clarify the position in relation to other major residential sites of 10 dwellings or more and minor residential development. In addition, the insertion of some additional text to that part of the policy that deals with the safeguarding of existing facilities is required to ensure it is consistent with national policy. **MM75** is necessary in these respects. Furthermore, to

ensure that the Plan is effective and justified, **MM74** is necessary to provide the up-to-date position in relation to emerging evidence and provide further clarification on the implementation of the policy in the supporting text.

### **Health and social care facilities**

274. The Framework indicates that planning policies should take into account and support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community. Informed by evidence from, and joint working with, the Dorset Clinical Commissioning Group, the Purbeck Locality Commissioning Group and the then Dorset County Council, Policy I6 of the submitted Plan allocates a site at Wareham to provide for an integrated health and social care hub. However, a modification is necessary to ensure that the requirements of the Habitats Regulations are reflected in the policy and to reflect the most up-to-date priorities of the Council and health and social care partners for service delivery by removing the specific reference to relocation of facilities from elsewhere [**SMM78**].

275. Additional changes are also made to the supporting text for effectiveness in **SMM87** to provide certainty of the revised stakeholder priorities for redevelopment of the former Middle School at Worgret Road, Wareham following local government re-organisation of Dorset councils in April 2019. This includes the requirement for a new GP surgery as part of a community health, social care and housing hub, to assist in meeting the partnership objective of achieving integrated health and social care and in doing so addressing needs for adult social care accommodation; respite accommodation, extra care housing, supported living, residential and nursing care and key worker housing.

### **Community facilities and services**

276. Policy I7 is a multi-faceted policy which indicates where new community facilities and services should be located; the circumstances where new development will be required to provide community facilities and services, and the criteria to be applied to development that would either replace or lead to the loss of an existing community facility/service.

277. The essence of the policy has been carried forward from PLP1. It has been put to us that the supportive approach in Policy I7 for community facilities and services outside of settlement boundaries could result in the grant of planning permission for inappropriate development in Green Belt. However, we are satisfied that this would not be the case (except where very special circumstances are demonstrated), given that Policy V2 relating to Green Belt as modified by **FMM7** does not alter national policy for proposals affecting the Green Belt. A proposed development for community facilities and/or services in the Green Belt should, therefore, necessarily be assessed in terms of its compliance with national policy alongside Policy I7.

278. Notwithstanding the above, to ensure that Policy I7 is effective it is necessary to provide certainty by encompassing a wider range of circumstances and to clarify the evidence that should be provided to assess applications relating to public services and facilities provided or delivered by public bodies, private bodies and non-profit organisations. The modification also includes necessary clarification of the approach to loss of existing facilities/services and consequential additions to ensure consistency with the Plan approach to the assessment of the impact of proposed development on the protected habitats sites elsewhere in the Plan. **SMM81** provides the necessary changes to Policy I7, with **MM79** and **MM80** amending the supporting text to provide clarity for decision making and thereby ensure that the Plan is effective.

## Conclusion

279. Subject to the modifications above, we are satisfied that the Plan's policies in relation to green infrastructure, trees and hedgerows; recreation, sport and open space; health and social care facilities and community facilities are soundly based.

## Issue 14 - Does the Plan make adequate provision to deliver infrastructure and would development be viable having regard to infrastructure and policy requirements?

280. The Infrastructure Delivery Plan (IDP)<sup>77</sup> submitted with the Plan was prepared following engagement with a range of key service providers and stakeholders and considers the infrastructure requirements to support the number of homes in Purbeck between 2018 and 2034 as envisaged in the submitted Plan. The delivery plan schedule in the submitted IDP includes various forms of infrastructure that are either not costed or timed although nominal costings have been made for these in the economic viability evidence. However, the IDP has subsequently been reviewed and updated<sup>78</sup>. The updated IDP was made available to inform the public consultation on the MMs. It provides a comprehensive list of potential improvements/enhancements to infrastructure, including that which is necessary to support the level of development as recommended to be modified by this report, as well as that which is desirable. The relevant necessary infrastructure will be delivered by the Plan including through Policies I1, H3, H4, H5, H6 and H7.

281. The Council will publish annually a statement of what infrastructure it anticipates will be delivered, alongside a monitoring report on CIL and Section 106 income and expenditure.

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<sup>77</sup> Document SD28

<sup>78</sup> Document MMCD6

## Viability

282. The Council commissioned consultants to carry out a series of viability appraisals and sensitivity tests throughout the Plan making process<sup>79</sup>. In addition, a further viability update was prepared during the examination<sup>80</sup>.
283. Overall, the viability assessment work provides a robust assessment of Plan viability based on the type and scale of development likely to come forward over the plan period and the various policy requirements. The Council's viability evidence is proportionate and up-to-date having regard to relevant national guidance.
284. In relation to the viability of the housing allocations and the policy requirements that apply to the allocations, we have considered all the evidence (including the updated viability evidence submitted during the examination stage<sup>81</sup>), and the representations made on the Plan including the verbal contributions at the hearing sessions. Whilst there is disagreement between the Council and the site promoters in relation to some of the assumptions made in the Council's economic viability assessment, we consider that with the modifications recommended elsewhere in this report [**SMM32, SMM35, SMM38, SMM40, SMM41, SMM45** and **SMM46**] these differences are not such as to result in a finding that development on any of the housing allocations would be unviable.
285. In relation to the requirement to provide affordable housing (Policy H11), the Plan provides sufficient flexibility in circumstances where an applicant considers there are significant economic constraints that would prevent the required affordable housing being provided.
286. Developer contributions towards relevant items in the IDP will be secured through Policy I1 as well as Policies H3, H4, H5, H6 and H7 of the Plan as recommended to be modified. However, to ensure that the Plan is effective, modification to Policy I1 is necessary to ensure that the policy requirements in relation to habitat sites mitigation are clear; to detail how funding for habitat sites mitigation will be secured; to clarify which mechanisms will be used to secure delivery or funding for heathland mitigation and nitrate and phosphate mitigation (if necessary for compliance with the Conservation of Habitats Species Regulations as amended, or any equivalent relevant legislation or regulations); to clarify the policy requirements in relation to open space, site specific transport and health infrastructure and to clarify how contributions for education provision will be used [**SMM69**].

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<sup>79</sup> Documents SD31-SD37

<sup>80</sup> Documents SD117

<sup>81</sup> Documents SD97 and SD117



287. The supporting text to Policy I1 requires amending to reflect changes in the CIL regulations since the submission of the Plan [MM67].

### **Conclusion**

288. Subject to the modifications indicated above, we are satisfied that the Plan makes adequate provision to deliver infrastructure and that the infrastructure and policy requirements are not of such a scale that they would threaten the viable development of sites.

### **Issue 15 - Are the Plan's Monitoring Framework and Glossary effective?**

289. The Plan includes a monitoring framework which details how its policies will be monitored. However, reflecting the matters discussed at the Hearing sessions, there is a need to strengthen the Framework and to ensure that it is comprehensive in its coverage and consistent with other modifications detailed in this report. **SMM82** will ensure that the monitoring framework provides the means to monitor its overall effectiveness.

290. To ensure the Plan is effective, some changes are also necessary to the glossary to support proper interpretation of the policies in the Plan and in response to other modifications in this report [MM83].

### **Conclusion**

291. Subject to the modifications indicated above, we are satisfied that the Plan's monitoring framework and glossary are effective.

## Overall Conclusion and Recommendation

292. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

293. The Council has requested that we recommend modifications to make the Plan sound and legally compliant and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended MMs, FMMs and SMMs set out in the Appendix, the Purbeck Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

*Beverley Doward, Susan Heywood and Gareth Wildgoose*

Inspectors

This report is accompanied by an Appendix containing the Main Modifications, Further Main Modifications and Supplementary Main Modifications.