

Independent Examination of the Purbeck Local Plan (2018-2034)

Inspectors' requests following receipt of Council technical paper relating to nutrient neutrality and housing land supply/delivery dated 2 September 2022

Further to our previous letter dated 19 August 2022 and prior correspondence on this matter, we thank you for the Council technical paper provided which sets out your current position relating to nutrient neutrality and housing land supply/delivery. It is our intention to reflect upon the evidence with a view to providing a more detailed response in due course. However, to assist that process we have the following requests for clarification at this stage:

Nutrient pollution of habitat sites

The evidence in the technical note (including the Natural England letter of 26 August 2022 in its Appendix 1) suggests that in the medium to long term, subject to enactment of legislation requiring improved efficiency at wastewater treatment works (WWTW), an approach that is focused on achieving nitrogen neutrality may be capable of providing effective mitigation for nutrients in Poole Harbour habitat sites as a whole. However, such outcomes appear dependent upon the enactment of the Levelling Up Regeneration Bill (LURB) by April 2023 as expected and associated delivery of legally required improvements to WWTW by 2030.

The letter from Natural England, however, suggests that they are unable to rule out likely significant effects from phosphorus discharge in wastewater until the LURB is enacted. As such, please clarify what you consider is likely to happen for development proposals in the short-term, including the possibility of unforeseen delays to enactment of the LURB and WWTW upgrades. Furthermore, we welcome your view as to whether the reliance on these dependencies has any implications for sites included in the 5-year housing land supply within the technical paper.

It is evident that there is an evolving local and national context relating to nutrient neutrality issues. Therefore, to support your response to the above, we recommend further engagement with Natural England and preparation of a Statement of Common Ground with a view to agreement of the Council's updated approach.

Housing land supply/delivery

The updated housing land supply/delivery evidence is welcomed. However, taking account of the passage of time since the initial hearing sessions, it would assist us if you could provide the following clarification:

- whether each of the sites included within the current housing land supply position as dated 2 September 2022 are those considered earlier in the examination and if not, identify any new sites that have been included;
- confirmation of and the reasons for sites that have been removed from the calculation of housing land supply since the initial hearing sessions, and;
- an explanation of any changes to assumptions relating to the sites remaining within the calculation of housing land supply.

Action Requested

Please prioritise the aforementioned requests as a matter of urgency and seek the completion of the requested work by not later than **Friday 7 October 2022** if possible, or otherwise inform us of any potential delay at the earliest opportunity.

If there are any procedural or other questions arising from this correspondence, the Council should contact us via the Programme Officer. We are not inviting, nor envisage accepting, any comments or additional evidence from other examination participants at this stage.

Susan Heywood

INSPECTOR

Gareth Wildgoose

INSPECTOR

7 September 2022