

Comment

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Comment by	Wyatt Homes (- 1190024)
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Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H1: Local Housing Requirement
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy H1 (Local Housing Requirement) sets out the overall housing requirement for the plan period (2018 to 2034) which amounts to 'at least 2,688 dwellings' (or 168 per year). Our client accepts that this housing requirement represents an accurate outcome of the 'local needs assessment' undertaken in accordance with paragraph 60 of the NPPF and is therefore an appropriate starting point for the local plan housing requirement. However, paragraph 60 of the NPPF is clear that the local needs assessment represents "the minimum number of homes needed". Further, the paragraph concludes:

"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

As we have expressed elsewhere in relation to the duty to cooperate process, the local planning authorities comprising the Eastern Dorset Housing Market Area (EDHMA) have so far failed to robustly quantify the level of unmet needs arising within the EDHMA or to tackle the issue of how these identified unmet needs (principally arising from Bournemouth and Christchurch) will be distributed across the remaining EDHMA authority areas. Therefore, as currently drafted, it would appear that Policy H1 is **neither positively prepared nor is it consistent with national planning policy.**

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Addressing this deficiency will require the Dorset local planning authorities (particularly those comprising the EDHMA) to explore the anticipated level of unmet need and agree how this should be addressed across the EDHMA, or more widely. If this joint approach is not possible within the time available, the issue will need to be addressed unilaterally by Purbeck District Council. This could be achieved by the Council proposing modifications to increase the planned housing delivery over the plan period in order to make at the very least a meaningful contribution towards accommodating the anticipated unmet needs from the urban Dorset area.

Our client is aware of several additional suitable residential site opportunities that could be identified to assist in delivering a portion of the unmet needs from neighbouring areas, if this is required. Such sites allocations could be inserted into the local plan without the need to alter the overall spatial strategy set out within the Pre-submission Purbeck Local Plan, thus avoid any significant delay to the examination of the Local Plan. These opportunities include the extension of the proposed allocation site at Blaneys Corner, Lytchett Matravers. This extension could contribute an additional 35 dwellings within the early part of the plan period, with no significant harm to the Green Belt or the wider natural environment. For further details of this proposed local plan modification, please see Wyatt Homes' 'Delivery Framework: Sunnyside Farm and Blaneys Corner' which is submitted alongside these representations.

If you have any supporting documents please upload them here.

[Delivery Framework for Blaneys Corner and Sunnyside Farm \(revised December 2018\)](#)
[Delivery Framework for Blaneys Corner and Sunnyside Farm \(revised December 2018\)](#)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

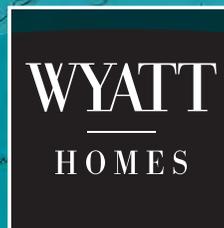
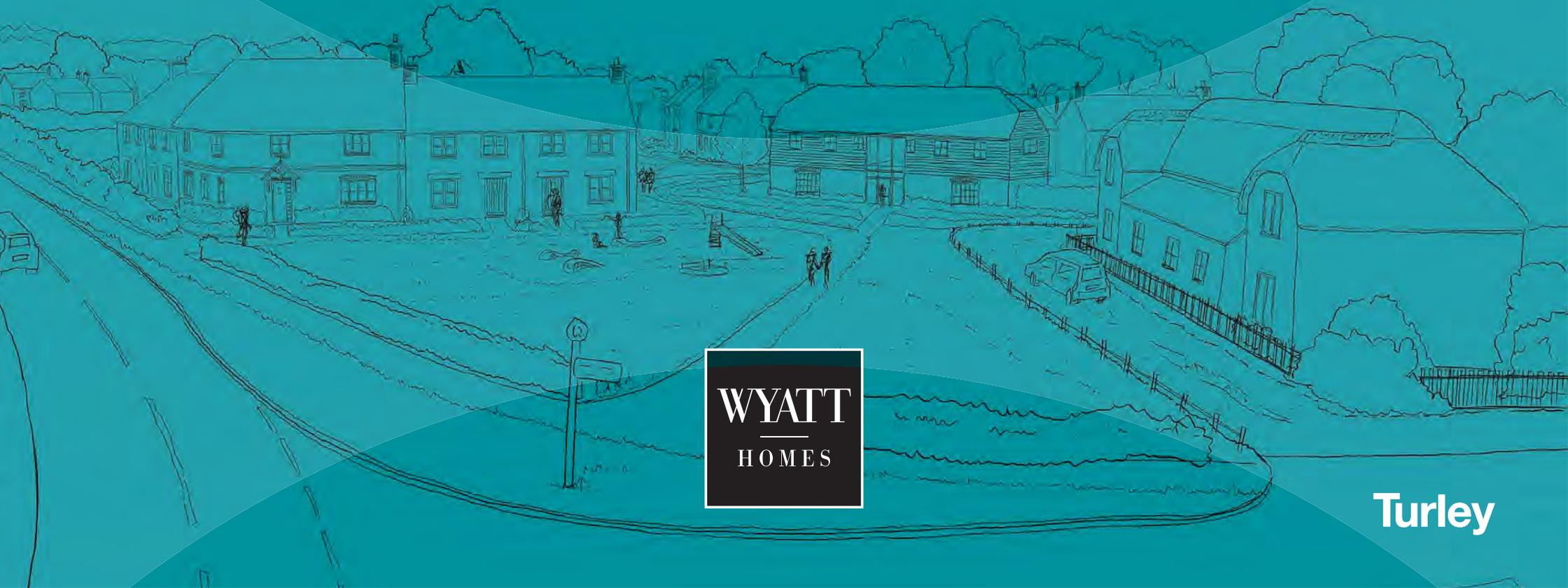
Wyatt Homes has a range of interests across the north east of the district, a number of which are being proposed for allocation by the Pre-Submission Purbeck Local Plan. Whilst our client is generally supportive of the Local Plan, there are a number of areas where there is concern that the Local Plan, as drafted, is not yet 'sound' but can be made so through a range of plan modification that we have proposed. Our client considers it important to attend the hearing sessions to assist the Council in exploring the areas where the plan is not yet sound and reaching a position whereby it may become so.

A Delivery Framework

Sunnyside Farm and Blaneys Corner, Lytchett Matravers

Response to the Pre-submission Purbeck Local Plan Consultation

December 2018



Turley

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Appendix 1: Supporting Documents

Introduction

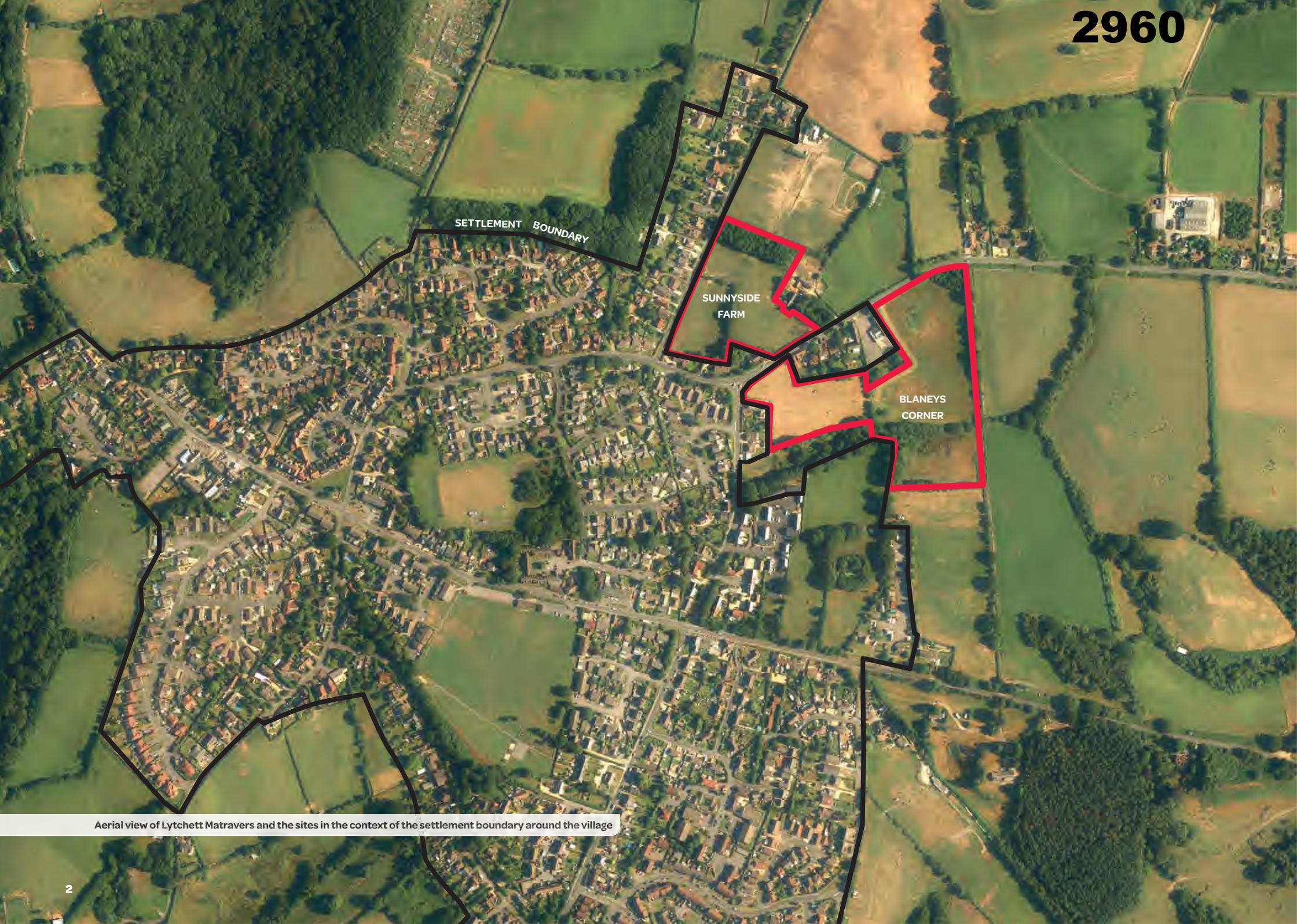
This Delivery Framework has been prepared on behalf of Wyatt Homes to support the Council's identification of Sunnyside Farm and Land at Blaneys Corner, Lytchett Matravers as proposed residential allocations in the emerging Purbeck Local Plan.

1.1 The aim of this document is to articulate the development potential of the sites and to support the proposed site allocations to deliver sustainable growth of up to 90 homes to help meet the District's housing needs during the emerging plan's period to 2034.

1.2 The document articulates:

- The Planning Context – a broad summary of the strategic development opportunity
- The Place – an appreciation of context and constraints, including key observations and responses
- The Proposal – the development potential and opportunities presented by the sites, including high level concept layouts

1.3 This document presents the two sites as a collective opportunity. With regard to Blaneys Corner, it is acknowledged that this document includes an area of land that is not included within the proposed site allocation identified within the Pre-submission Purbeck Local Plan.



SETTLEMENT BOUNDARY

SUNNYSIDE FARM

BLANEYS CORNER

Aerial view of Lytchett Matravers and the sites in the context of the settlement boundary around the village

Wyatt Homes

1.4 Wyatt Homes is a long established and privately owned house building company, based in the South West. The company's aim is to design and build properties of exceptional quality, without compromising on materials or attention to detail. With this focus the high quality homes and places designed and built by Wyatt Homes over the past quarter of a century have brought satisfaction to their occupiers and enhanced the character of local communities. Wider recognition has also been achieved through the awards the company has won for exemplary quality, design and craftsmanship.

The Delivery Framework

1.5 It should be noted that the proposals set out in this document represent 'work in progress'. They will continue to be refined and informed by ongoing and further technical work being carried out by Wyatt Homes' appointed team of specialist consultants who have extensive experience in the delivery of sustainable new developments through the planning process.

1.6 Whilst this document can be read on its own, it is supported by a range of technical assessments and reports which have informed the understanding of the sites and their development potential. These documents were also previously submitted to the Council and a full list of the documents is set out in **Appendix 1**.



Examples of high quality homes delivered by Wyatt Homes

The Planning Context

Purbeck District Council adopted the Purbeck Local Plan Part 1 (PLP1) in November 2012 and commenced its Local Plan Review consultation process in late 2014 / early 2015.

2.1 The PLP1 is already planning for the delivery of 2,520 new homes during the Plan's period of between 2006 – 2027, equating to an annual delivery target of 120 homes per year. The PLP1 sets a long term vision, objectives and planning policies to steer and shape development across the District.

2.2 However, at the Examination of the PLP1 the Inspector raised concerns that the Council had not sufficiently explored the full housing growth potential in the District to meet its objectively assessed housing need (as it was identified at that time). The PLP1 was therefore adopted on the requirement that a review of the Plan be undertaken by 2017 - specifically to look at the potential for delivering higher growth. The Council commenced work on the Partial Review in late 2013 and between January and March 2015 consulted on an Issues and Options consultation document.

2.3 In June 2016 the Council formally carried out a further 9 week consultation on an Options Partial Review Local Plan document. The Options document confirmed that the adopted PLP1 was failing to deliver enough homes to meet the District's objectively assessed housing needs as identified by the Final Eastern Dorset Strategic Housing Market Assessment (SHMA) in the period 2013 - 2033.

2.4 In January 2018 the Council undertook a consultation on a range of options for the local plan, including on broad areas for residential growth. The results indicated that that the local community were more likely to support housing options that spread development across Purbeck.

Purbeck's settlements and its spatial areas



2.5 An update of the 2015 Eastern Dorset SHMA was published in August 2018, indicating a local housing need of 168 homes per year, or 2,688 homes over the 2018 to 2034 local plan period. This housing need is now being proposed within the Pre-submission Purbeck Local Plan that was published in November 2018.

2.6 The approach set out within the January 2018 housing options consultation that was most preferred by the local community has been carried forward into the Pre-submission Purbeck Local Plan. This involves the proposed allocation of a range of sites across the District, including (as set out within Policy H6) Wyatt Homes' sites at Blaneys Corner and Sunnyside Farm (known in the local plan as Land east of Flowers Drove).

2.7 The Pre-submission Purbeck Local Plan is supported by a considerable number of recent technical evidence documents, including the Sustainability Appraisal (2018), Environmental Capacity Study (2017), Green Belt Studies (2016, 2017 and 2018) and the Housing Background Paper (2018). Each of these documents supports the case for allocating the sites. However, in the case of Blaneys Corner, the proposed allocation is smaller than the site promoted within this document, allowing for the delivery of 25 homes as opposed to the scheme for 60 homes set out here.

The combined capacity to deliver housing at the two sites was identified within the 2016 Options document, and its supporting evidence base, to be approximately 90 new homes (30 homes at Sunnyside Farm and 60 homes at Blaneys Corner).

The Lytchett Matravers Neighbourhood Plan

2.8 In June 2017 the Lytchett Matravers Neighbourhood Plan (NP) was made. The NP does not allocate sites recognising that the village is currently surrounded by designated Green Belt land requiring all future housing sites beyond the defined settlement policy boundaries to be brought forward as part of the Local Plan process.

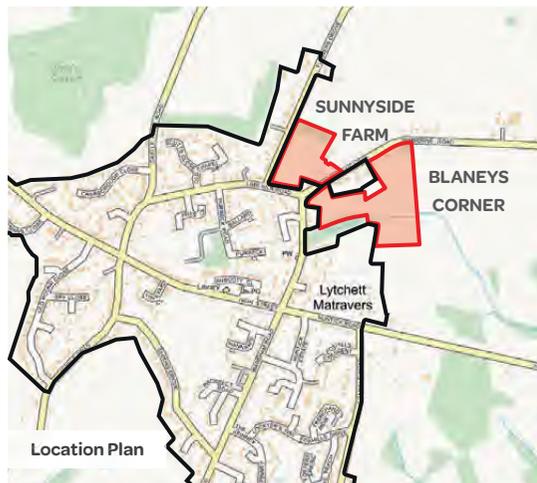
2.9 The NP sets out the community's overall vision for the village which is based upon retaining the essence of village life in a growing community and to deliver high quality infrastructure and amenities in the years to 2031. The Plan acknowledges that there is a significant shortage of available housing across the region and that while Lytchett Matravers will inevitably be required to provide more housing to meet local needs over the coming years, any development needs to align with the NP's vision and objectives. Some of the key cited objectives include:

- meeting the housing needs of all who want to live in the village
- promoting walking and extending the existing village footway network
- and, promoting a regular viable set of village bus services to serve the community.



The Place

Combined, the sites comprise an area of 5.68 hectares located to the north of Lytchett Matravers.



Location

3.1 The sites are adjacent, separated by Wimborne Road. Sunnyside Farm has an area of 1.86 hectares, whilst that of land at Blaneys Corner is 3.82 hectares.

3.2 The land at Sunnyside Farm comprises three small fields in agricultural use. The site is surrounded on three sides by existing development, ranging from single storey bungalows to two storey properties (to the east, south and west). Along the northern boundary and extending into the site by approximately 25 metres, there is a copse of woodland consisting of a mix of Ash, Birch, Lime and Sweet Chestnut. There is a further belt of trees beyond the site's north-east boundary. The boundary hedges to the west (fronting Flowers Drove) and south east are continuous and approximately 1.5 – 2 metres in height. Internal definition is provided to the three fields by low level post and wire fencing. There is a change in gradient across the site, undulating from south-to-north and rising east-to-west.

3.3 Land at Blaneys Corner consists of three fields in agricultural use, contained by development to the north-west on Wimborne

Road and south-west on Wareham Road. These properties range from single storey to two storeys. To the south, the site adjoins the allocated housing site fronting onto Huntick Road. Wyatt Homes are currently preparing a full planning application for the development of 46 dwellings at this site.

3.4 The boundaries of the land at Blaneys Corner site include a range of hedges, trees and mature wooded belts. Internal field definition is provided by a mix of hedges and some stock - proof fencing. The site has two sections of frontage onto Wimborne Road along its northern boundary. There is a change in gradient across the site initially dipping down and rising again from south-to-north with a more gentle undulating change from east to west.

3.5 Beyond the immediate boundaries of both sites, the landscape to the south and west comprises the built up area of northern Lytchett Matravers. To the north and east, the landscape is more rural comprising agricultural fields defined by hedgerows and belts of trees, small areas of woodland and a few residential properties.



Tesco Express in the village along the High Street



Bus stop on Lime Kiln Road



Recreation ground looking towards the village hall



Entrance to Lytchett Matravers Primary School

Key Features and Characteristics

A Sustainable Place

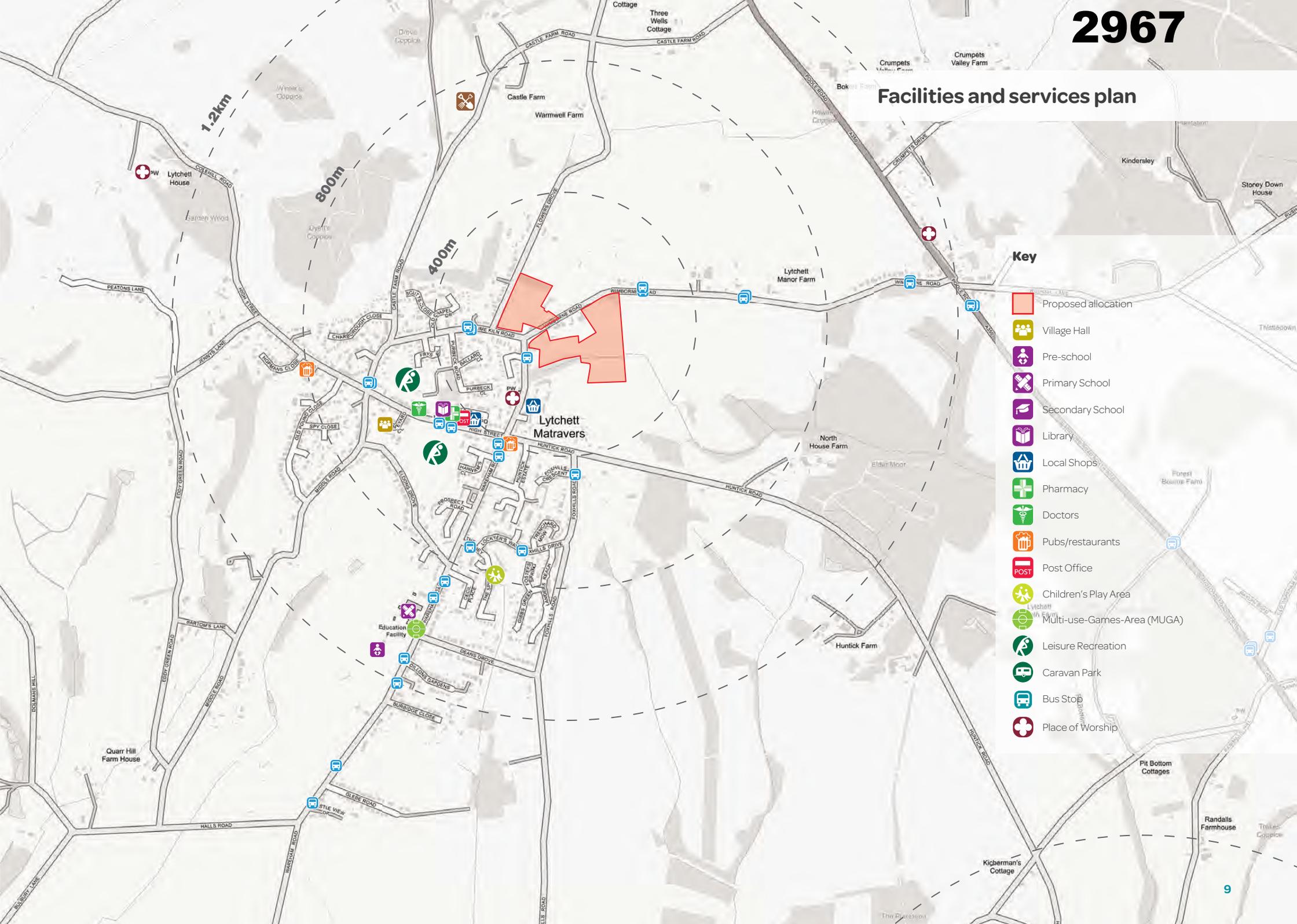
3.6 The adopted Local Plan includes a 'settlement hierarchy' to focus the distribution of development across the District and to define the role of its settlements. This established hierarchy is being carried forward as part of the Local Plan Review. Lytchett Matravers is identified as one of the District's six Key Service Villages wherein it is a location where new development is to be focused given the existing community, cultural, leisure and other types of development that are already present. In short, the village is capable of supporting sustainable development and the sites represent sustainable locations, with existing development to the south and west.

3.7 Within the village there is a range of facilities (listed below) that will assist in delivering a sustainable development:

- The village centre is located approximately 400 metres (5 minutes' walk) to the south-west of the sites. The village has a number of local facilities including; a Tesco Convenience Store, a Post Office, Public Houses, a library, GP surgery, pharmacy, a Church and the Parish Hall.

- Employment opportunities are available at Freeland Park (a modern development of office and light industrial units) located within the village.
- The nearest bus stop is positioned on Lime Kiln Road, around 50 metres to the west of Sunnyside Farm (less than 1 minutes' walk). This is served by bus route no.10 providing an hourly service connection between Lytchett Matravers and Poole town centre (via Poole railway station) throughout the day (Monday to Saturday).
- The Lytchett Matravers Pre-School and Primary School, located on Wareham Road, is within approximately 1,000 metres of the sites.
- The site is within the catchment area of Lytchett Minster Comprehensive School which is approximately 2.25 km to the south east of the site. The School is accessible by school bus service 718 that stops at the Wareham Road bus stop, 5 minutes' walk (400 metres) to the south of the sites.
- The sites are within approximately 300 metres of the Lytchett Matravers Village Green playing fields. The site also benefit from close proximity to a number of existing green and open spaces located elsewhere in the village, including the Multi-Use-Games-Area (MUGA) located adjacent to the Lytchett Matravers Pre-School and Primary School to the south.

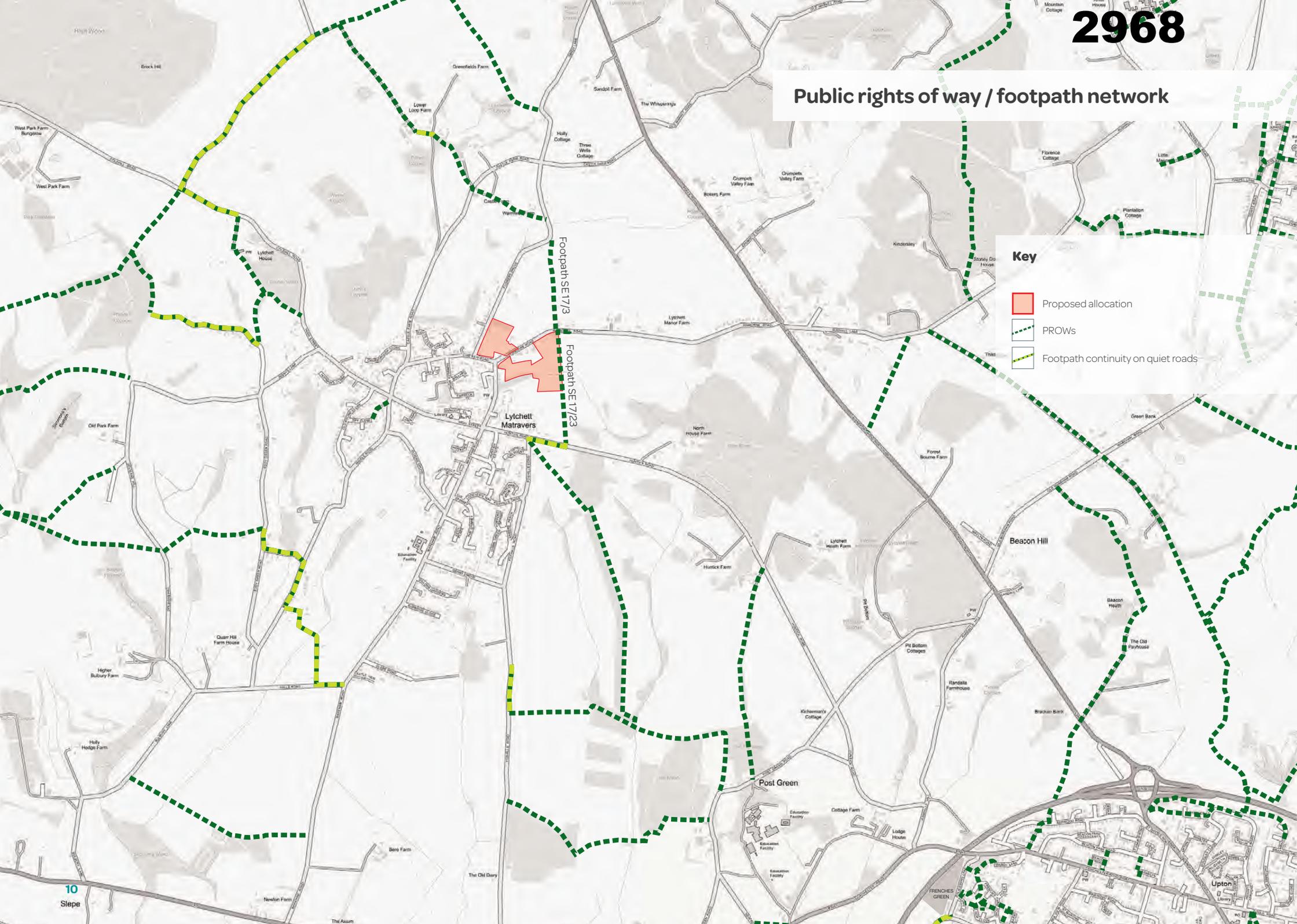
Facilities and services plan



Public rights of way / footpath network

Key

-  Proposed allocation
-  PROWs
-  Footpath continuity on quiet roads



Connections



3.8 Wimborne Road is a two-way public highway with a speed limit of 30mph, rising to 40mph to the east of the former Royal British Legion (RBL) building. At present there is a dedicated pedestrian footpath along the southern side of Wimborne Road which ends at the former RBL's curtilage. Lime Kiln Road and Wareham Road each have 30mph speed limits with pedestrian footpaths along at least one side of the lengths of these routes. Flowers Drove is a more restricted carriageway at approximately 4.5m width along the majority of the section passing along the Sunnyside Farm site's western boundary. There are currently no dedicated footpaths along this section of Flowers Drove with pedestrians currently needing to share the highway space.

3.9 Awcock Ward Partnership (AWP) has assessed the sites in relation to immediate proximity to infrastructure. This assessment has concluded that the sites are accessible to a range of local facilities, including convenience retail stores, health services and primary education. There are existing public transport services linking to Lytchett Minster School and to Poole town centre. Poole town centre provides for a variety of employment, education, healthcare and retail opportunities, in addition to access to the national railway network. Therefore, the development of the sites for new homes will also generate an increase in the potential patronage for the existing local bus services in the village, reinforcing their longer term viability.

3.10 There are a number of bus stops located to the east, west and south of the sites and within the wider village itself. The sites also benefit from easy access to the main road A350 to the north-west and the main road A35 to the south providing road links to Upton, Poole and beyond.

3.11 There are a number of established Public Rights of Way (PROW) surrounding the village. Immediately adjacent to the eastern boundary of the Blaneys Corner site is the PROW SE 17/23. The Lytchett Matravers Neighbourhood Plan seeks to enhance, promote and extend the footpath network around the village.



Morebus No.10 traveling along Lime Kiln Road.

Landscape and Visibility



View looking north-east from Wimborne Road, opposite the eastern boundary of Sunnyside Farm.



View looking north-west from Wimborne Road opposite the north-eastern boundary of Blaneys Corner



View looking north from footpath SE 17/23 adjacent to the eastern boundary of Blaneys Corner

3.12 Hankinson Duckett Associates (HDA) has carried out comprehensive Landscape and Visual Analysis, which will be submitted in support of this Delivery Framework.

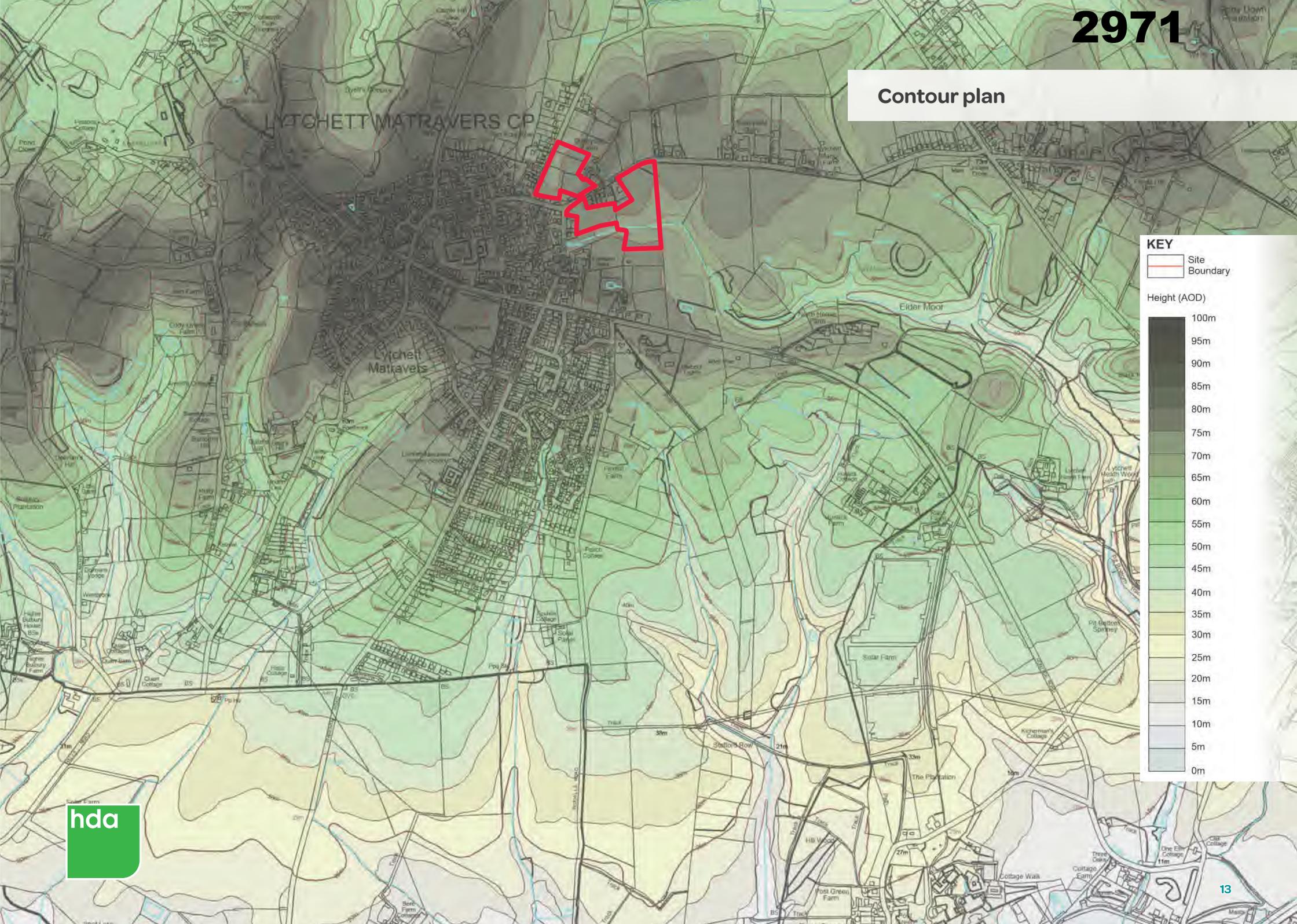
3.13 The sites are located to the north and north east of the village's existing and planned built up area. The village itself is situated on a broad ridge of high ground, which generally runs east to west with branches to the north and south. A plan showing the contour level changes across the village and wider surrounding area is presented opposite. The elevated position of the village affords some long distance views over the surrounding rural landscape with some long distance views of Poole also visible to the south-east. The ridge is incised by valleys, particularly to the south, with watercourses that flow south to Sherford River and Lytchett Bay. The sites themselves are not located on the highest ground levels but on land falling away from them. The Sunnyside Farm site has a high point of 81 metres AOD, akin to the higher ground levels elsewhere in the village.

3.14 The Dorset Landscape Character Assessment identifies 22 character areas across the County. The sites are situated within The Rolling Wooded Pasture character area. The key characteristics of the Morden / Lytchett Rolling Wooded Pasture are considered to include: open views from elevated points; harmonious links between the natural and woodland blocks; the folded intimate valley forms around Lytchett Matravers; and the hedgerows and woodland blocks giving the impression of a well treed landscape.

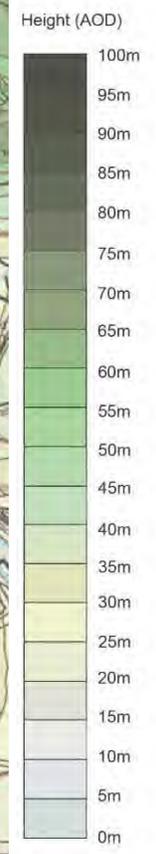
3.15 The sites are well related to the existing settlement and predominantly visually well contained from the wider landscape by existing copses of woodland and mature treed and non-treed hedgerows.

3.16 Views of the sites are largely restricted to receptors within the existing settlement, i.e. limited views from the rear of properties on Wimborne Road and Wareham Road and the front of properties on Flowers Drove. There are partial views of the eastern area of Blaneys Corner from Wimborne Road where the site frontage shares its boundary with the road. Longer distance views of the sites are restricted to limited glimpsed views, i.e. from the public footpaths in the vicinity of the sites through intermittent gaps in the existing vegetation. These views are capable of being mitigated through additional reinforced planting on the site boundaries. In landscape and visual terms, the sites are capable of being developed without harm to the surrounding landscape character but with appropriate design being required to ensure that key landscape features are retained and reinforced.

Contour plan



KEY
Site Boundary



Green Belt

3.17 The Purbeck Local Plan Part 1 established the current extent of the Green Belt within the District. Lytchett Matravers is an inset village within the South East Dorset Green Belt. As part of the review of the Local Plan, the Council carried out and published Green Belt Review studies in 2016, 2017 and again in 2018. These involved the assessment of a number of sites located around key Green Belt constrained towns and villages, including; Upton, Wareham, Lytchett Matravers, and Lytchett Minster. The purpose of the reviews was to determine the contribution of assessed sites to the five purposes of including land within the Green Belt, as set by the National Planning Policy Framework (NPPF) and to establish the ‘exceptional circumstances’ required for the release of some sites to meet the District’s development needs.

3.18 The Council’s assessment of Sunnyside Farm and the assessed extent of Land at Blaneys Corner concluded that the sites would be suitable for removal from the Green Belt, including the following comments from the 2016 review:

Sunnyside Farm – *‘...As long as development did not extend the settlement any further east or north than at present, Lytchett Matravers would not extend towards the conurbation and development here would not harm the function of the greenbelt.’*

Blaneys Corner – *‘...The Council has already released land to the south of this site at Max Gate (Huntick Road) for a settlement extension. Further development could sit comfortably at this site without resulting in sprawl towards the conurbation.’*

3.19 In recognition of the Council’s process of Green Belt review, HDA has carried out an independent assessment of the sites’ Green Belt contribution, which includes the eastern fields of the Blaneys Corner site, not previously assessed by the Council’s review. The HDA Green Belt Boundary Review was previously submitted separately as part of this response to the Options Consultation Local Plan. The findings of HDA’s assessments are generally consistent with the Council’s June 2016 Review and can be summarised as follows:

Purpose 1: Checking unrestricted sprawl of large built-up areas

- The sites do not lie adjacent to a large built-up area and are situated in a location consistent with the existing settlement pattern. The sites are distant from the conurbation. Assessed contribution: Very low / none (Sunnyside Farm); and Low (Blaneys Corner).

Purpose 2: Preventing neighbouring towns merging into one another

- With the exception of a small section at the east of Blaneys Corner, development within the sites would not extend beyond the existing settlement edge of Lytchett Matravers and would not noticeably alter the spatial relationship between the village and any adjacent settlement. Assessed contribution: Very low / none (Sunnyside Farm); and Low (Blaneys Corner).

Purpose 3: Assist in safeguarding the countryside from encroachment

- The sites are well related to the existing (and already planned) development edge and are physically separated from the rural landscape beyond the settlement by robust tree belts and hedgerows. Assessed contribution: Low (Sunnyside Farm); and Medium (Blaneys Corner).

Purpose 4: Preserving the setting and special character of historic towns

- The sites have no relationship with the Lytchett Minster Conservation Area or with any listed buildings present within Lytchett Matravers. Assessed contribution: Very low / none (both sites).

3.20 HDA’s overall conclusions are that the sites’ contribution to the purposes of the Green Belt are generally low due to their positions within the context of the existing village; combined with the ability to mitigate potential impacts on the limited views from the wider landscape as part of future development. Moreover, HDA’s assessment demonstrates that the larger land area being promoted for the Blaneys Corner site is highly enclosed and is well related to the existing settlement. It is therefore as suitable to release from the Green Belt as the smaller area which is suitable for release by the Council’s latest Green Belt Review and the Pre-submission Local Plan.

3.21 The sites can be developed without harm to the aims and purposes of the Green Belt in a way which ensures the provision of a robust new Green Belt boundary.



View looking north from the high ground along the southern boundary of Blaneys Corner



View looking south-east towards Blaneys Corner from the junction between Wimborne Road and Wareham Road.



View looking south-east across Sunnyside Farm towards residential properties along Lime Kiln Road.



View looking north east from footpath SE 17/23.



Kiln Cottage, a Grade II listed building



Lytchett Matravers Methodist Church



Lytchett Matravers Old School House

Heritage

3.22 The historic settlement pattern of Lytchett Matravers (pre-1900s) was of a loose agglomeration of buildings connected by lanes and interspersed with fields. This is reflected in the scattered listed buildings found across the village and the lack of any Conservation Area designation. The village remained relatively unchanged for the early part of the 20th Century, although it underwent a significant increase in development after the war, which has resulted in the current large size and nucleated settlement pattern. The proximity of the village to Upton and Poole has maintained development pressure on the village which has been constrained largely due to the surrounding Green Belt designation.

3.23 There are two listed buildings within proximity to Sunnyside Farm: Tall Tree Cottage (Grade II) is about 60 metres to the south west and Kiln Cottage (Grade II) is located about 85 metres west of the site. Due to the presence of intervening development and the absence of intervisibility between the heritage assets and the site, neither of these buildings or their settings would be substantially or less than substantially harmed as defined by Section 16 of the NPPF.

Biodiversity

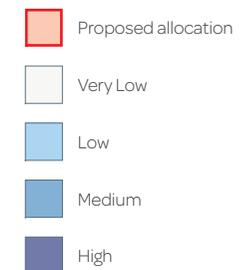
3.24 An Ecological Appraisal by HDA identifies the land at Flowers Drove and Sunnyside Farm as horse-grazed grassland paddocks, generally bordered by native hedgerows, with a block of semi-mature broadleaved plantation woodland along the northern margin. The land at Blaneys Corner also comprises grassland fields, generally bordered by species-poor native hedgerows, mature scrub and treelines with ditches.

3.25 With regard to protected and notable species, the ecology surveys carried out to date have identified that the land at Flowers Drove and Sunnyside Farm may have some potential for roosting, foraging and commuting bats. In addition there may be limited potential for Hazel Dormice and some potential for low numbers of Great Crested Newts (during terrestrial phases only). The potential for protected and notable species is similar for Blaneys Corner, albeit with some additional potential for water voles being present.

Flood Risk

3.26 The sites are located entirely within Flood Zone 1 with an assessed probability of flooding from rivers or the sea of less than 1 in 1,000 per year.

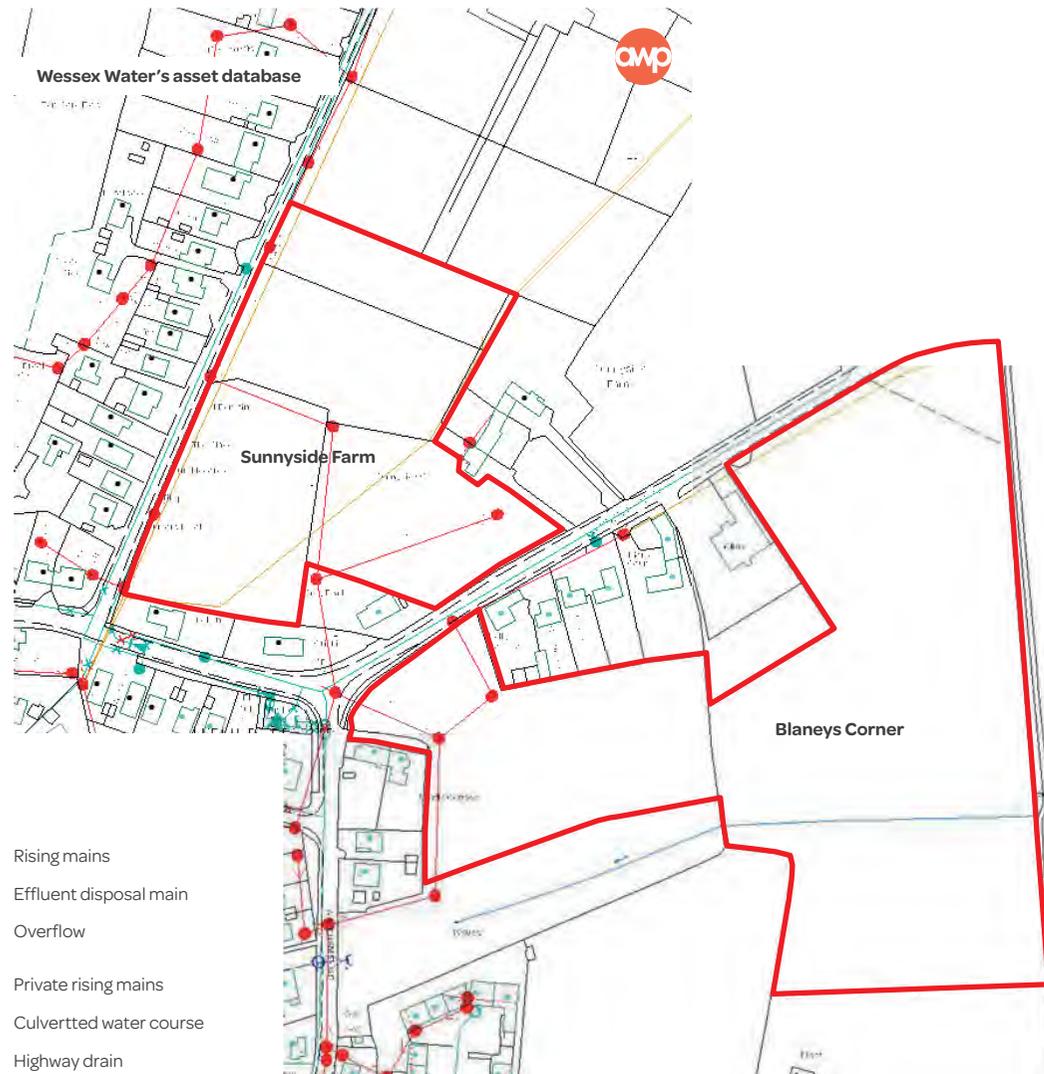
3.27 The Environment Agency's 'Flooding from Surface Water' mapping also indicates that the majority of the sites are within an area at very low risk of flooding from surface water (0.01% per year). The exceptions to this comprise a narrow corridor within the western site area of Sunnyside Farm and an area within the south of Blaneys Corner which follows the path of a small watercourse. These two areas show a low and medium risk of flooding (between 0.1 – 3.3% chance per year) and a higher risk of flooding (greater than 3.3% chance per year) respectively. Development will be avoided within these areas or, where this is not feasible, appropriate mitigation used to overcome the risks.



Site Drainage

3.28 A desktop review of the Soilscape Dataset, carried out by Awcock Ward Partnership (AWP), indicates the sites are underlain by 'slightly acid loamy and clayey soils with impeded drainage'. Soakaways are therefore unlikely to present a viable method of surface water disposal. On-site attenuation, combined with controlled off-site discharge, is considered to be the most appropriate drainage solution.

3.29 Wessex Water asset record data has identified a number of 150mm diameter foul sewers and rising mains at the boundaries of Sunnyside Farm and also running through the site. There is similarly an existing 150mm diameter foul sewer within the west of Blaneys Corner and an existing foul rising main adjacent to the north-eastern boundary at Wimborne Road. There is also an existing minor watercourse, which flows eastwards between the two eastern fields of the Blaneys Corner site.





Example of a Wyatt Homes development



Aerial view: Illustrative perspective sketch looking south-east towards Blaneys Corner from the junction between Wimborne Road and Wareham Road

The Proposal

Wyatt Homes' proposed concept for Sunnyside Farm and Land at Blaneys Corner positively responds to the qualities of these sites and their setting, to ensure that future development will sensitively integrate with the existing village and the wider rural landscape context.

4.1 The quality of the surroundings at Lytchett Matravers demand the right balance between landscape and built form. This is critical to delivering the right place that will be a successful and positive addition to the village.

4.2 An analysis of the sites' constraints and opportunities, as summarised in the previous section of this document, has been undertaken. From this understanding, a framework masterplan has been prepared. A number of themes have been identified that have in particular helped to shape the masterplan:

- Levels and Views
- Landscape Structure and Biodiversity
- Utilities and Drainage
- Access and Movement

Levels and Views

Key Observations

- 4.3** The sites exhibit a gently undulating character, with slopes present on both sites.
- 4.4** The external site boundaries comprise a mix of hedgerows, ranging from 1.5 to 5 metres in height with mature tree specimens throughout. Sunnyside Farm includes a planted woodland copse extending approximately 25 metres into the site which is a visually robust landscape feature and end point of the site. The weakest defined boundaries currently comprise the southern boundary in the eastern half of Blaneys Corner and the eastern and north-eastern boundary lengths adjoining Sunnyside Cottages.
- 4.5** Sunnyside Farm and Blaneys Corner are well contained - views into the sites are mostly limited to the existing residential properties in their immediate proximity.
- 4.6** Long distance views out of the sites are equally limited by the presence of existing boundary landscape and topographical features.

Response

- 4.7** The existing woodland copse at Sunnyside Farm should be retained as a landscape feature edge to the development, providing strong visual containment of the site.
- 4.8** The location and form of new development should be sensitive to the site levels, making use of the opportunities to deliver a distinctive and varied place.
- 4.9** The weakest defined site boundaries should be reinforced and strengthened to complete the visual containment of the sites.

Site analysis plan : Sunnyside Farm



Site analysis plan : Blaneys Corner

KEY

-  Site boundary
-  Public right of way
-  Potential footpath / cycleway
-  Developed edge
-  Existing landscape buffer
-  Potential landscape buffer
-  Intervisibility with the site



Landscape Structure and Biodiversity

Key Observations

4.10 The site boundaries fronting Flowers Drove and Wimborne Road (where not already punctuated by existing driveways serving private properties on Wimborne Road) are characterised by out-growing boundary hedgerows.

4.11 The internal field boundaries in Blaneys Corner include good quality areas of treed hedgerows with landscape and biodiversity value.

4.12 The northern woodland belt in Sunnyside Farm should be retained as it represents a strong feature in the existing landscape structure.

4.13 There are a number of high and moderate quality (Grade A and B) tree specimens along sections of the site boundaries of Blaneys Corner.

Response

4.14 Where required, reinforcement of the sites boundaries, i.e. south eastern corner of Blaneys Corner, should be implemented. Across both sites, properties should be sufficiently set back from the site edges to ensure long term retention of the landscape boundary definition.

4.15 The northern copse of woodland in Sunnyside Farm should be retained to ensure continuity of the existing landscape character.

4.16 An area of landscaped open space could be created in the north western edge of Blaneys Corner creating a new managed feature to announce the arrival point to the village and to better integrate the site.

4.17 Habitats which have biodiversity value and the higher quality trees throughout the sites should be retained.

4.18 There is scope to provide a link between Blaneys Corner and the already allocated Huntick Road development site, without resulting in detriment to the existing landscape structure or habitats of biodiversity value.



View looking north from the southern end of Flowers Drove.



View looking south-east from the junction between Wimborne Road & Wareham Road

Habitat survey plan



KEY	
[Red outline]	Site boundary
[Green diagonal lines]	Broadleaved plantation woodland
[Green circles]	Scattered trees
[Green dashed line]	Defunct species-rich hedgerow
[Green solid line]	Intact species-poor hedgerow
[Green dashed line with dots]	Defunct species-poor hedgerow
[Green dashed line with squares]	Defunct species-poor hedgerow with trees
[Green cross-hatch]	Dense native scrub
[Black cross-hatch]	Scattered scrub
[Red solid]	Dense Bracken
[Red diagonal lines]	Tall ruderals
[SI in a circle]	Species-poor semi-improved grassland
[Red diagonal lines with dots]	Marshy grassland/ rush pasture
[Black dashed line]	Fence
[Blue dashed line with arrow]	Wet ditch and direction of flow
[Blue dashed line]	Dry ditch
[Red circle with number]	Target note

Utilities and Drainage

Key observations

4.19 Existing public foul sewers and rising mains pass through Sunnyside Farm, requiring easement corridors ranging from 6 to 12 metres either side of the pipe centre lines.

4.20 Soil conditions across both sites are likely to preclude the use of soakaways for surface water disposal. On site attenuation with controlled off-site discharge(s) will be required.

4.21 An overhead electricity transmission cable follows the eastern boundary of Blaneys Corner and is located within the site. A further overhead electricity transmission cable is present adjacent to but beyond the southern boundary of Blaneys Corner.



View looking north from footpath SE 17/23 showing the overhead power cable following the eastern boundary of Blaneys Corner

Response

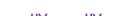
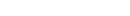
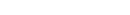
4.22 Rising mains within Sunnyside Farm should be left in their current locations with appropriate easements being designed into the development.

4.23 The existing foul sewers within Sunnyside Farm should be diverted as required, rather than designed into the development.

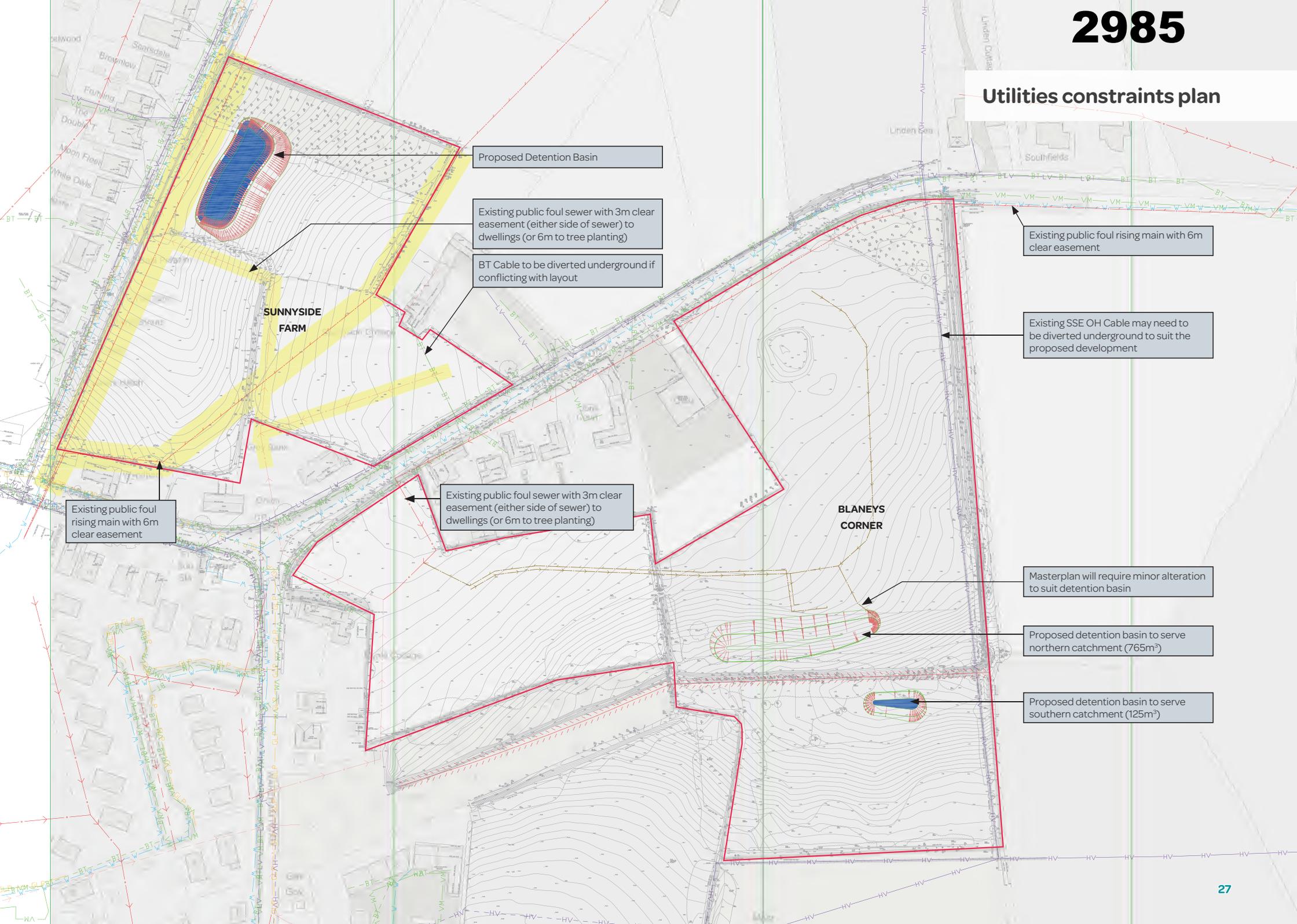
4.24 On-site storage attenuation ponds should be incorporated within the design of the development, siting the ponds in the best locations to maximise the use of gravity flows.

4.25 The overhead electricity transmission cables may need to be diverted or run underground to accommodate development.

Key

	Site Boundaries
	Developable Area
<u>Existing Utilities</u>	
	WW Distribution Main
	SSE HV OH Cable
	SSE HV UG Cable
	SSE LV UG Cable
	SSE LV OH Cable
	SSE OH EHV Cable
	BT UG Cable
	BT OH Cable
	Virgin Media UG Cable
	SGN Low Pressure Main
	SGN High Pressure Main
<u>Existing Drainage</u>	
	Adopted Foul water sewer
	Adopted Surface water sewer
	Adopted Foul Rising Main
	Ditch
	Easement either side of Foul Sewer

Utilities constraints plan



Proposed Detention Basin

Existing public foul sewer with 3m clear easement (either side of sewer) to dwellings (or 6m to tree planting)

BT Cable to be diverted underground if conflicting with layout

Existing public foul rising main with 6m clear easement

Existing SSE OH Cable may need to be diverted underground to suit the proposed development

Existing public foul rising main with 6m clear easement

Existing public foul sewer with 3m clear easement (either side of sewer) to dwellings (or 6m to tree planting)

BLANEYS CORNER

Masterplan will require minor alteration to suit detention basin

Proposed detention basin to serve northern catchment (765m²)

Proposed detention basin to serve southern catchment (125m²)

SUNNYSIDE FARM

Access and Movement

Key observations

4.26 Blaneys Corner has two areas of frontage onto Wimborne Road. The largest section is situated to the east of the former British Legion building, within what is currently a 40 mph speed limit zone. The smaller section of frontage, on the north western corner of the site, is within the 30 mph speed limit zone. The opportunity to introduce a vehicular access in this location is limited.

4.27 Sunnyside Farm has two highway boundary frontages. To the west, the site boundary follows Flowers Drove, which is a narrow rural lane. The short frontage to the south east is onto Wimborne Road, opposite existing residential properties.

4.28 The sites are not currently publically accessible. There are however existing public rights of way in close proximity to the sites.

4.29 Blaneys Corner adjoins the existing settlement extension allocated site on Huntick Road (Policy NE1 of the adopted Local Plan). This provides a further opportunity to integrate the site with the existing and planned village.

Response

4.30 Simple priority junctions should be provided for vehicular accesses into each of the sites at appropriate locations along Wimborne Road. It is anticipated that the required visibility splays could be achieved without need for any offsite works.

4.31 The existing 30 mph zone should be extended to include the full site frontage of Blaneys Corner. This will enable creation of a safe vehicular access at the north eastern site frontage and improve pedestrian safety for users when crossing the road to connect between the public rights of way (SE 17/23 to SE 17/3) adjacent to the site.

4.32 Improvements to the existing pedestrian footway on Wimborne Road should be sought to further increase safety and to promote sustainable access to the village.

4.33 The creation of a link between Wimborne Road and the allocated Huntick Road site should be considered to enhance the permeability of the development and the wider movement options through the village.

Key

	Site Location
	Main Vehicle/ Pedestrian Access
	Public Right of Way
	Bus Stop
	Primary School
	Post office
	Convenience Store
	GP Surgery
	Pharmacy
	Playing Field

Accessibility plan



The Concept

4.34 Having identified the sites' key features and characteristics, these have been applied to develop a framework masterplan for the sites.

4.35 For each of the sites, the framework masterplan responds to the constraints and key opportunities to create an attractive and sustainable development that responds positively to its surroundings and the wider context. The site masterplans will deliver around 90 new homes in total, in addition to new public green open space within each site.

Sunnyside Farm

Land Use	Area (ha)	%of site area
Approximate new residential developable area	0.88	47
Approximate open space area	0.61	33
Roads and footpaths	0.37	20
Total site area	1.86	

Blaneys Corner

Land Use	Area (ha)	%of site area
Approximate new residential developable area	2.19	57
Approximate open space area	1.16	31
Roads and footpaths	0.45	12
Total site area	3.82	

Land at Blaneys Corner presents the opportunity to deliver around 60 new homes

- 1 New access connection created to Wimborne Road
- 2 Homes set back to front a strengthened hedgerow edge to Wimborne Road
- 3 Opportunity to establish new footpath connection directly opposite existing public routes
- 4 New tree and hedgerow planting to redefine the Green Belt boundary and screen inward views
- 5 Central public green space incorporating the existing watercourse and providing space to support sustainable drainage requirements
- 6 New bridge crossing to connect over the existing watercourse
- 7 Feature dwellings with south facing gardens overlooking the central green space
- 8 Potential access connection to the existing Local Plan allocation site off Huntick Road
- 9 Focal green providing amenity space for new and existing residents
- 10 'Corner green' creating welcoming village arrival space and inviting pedestrian connections to and from the village

Land at Sunnyside Farm presents the opportunity to deliver around 30 new homes

- 11 New access connection created to Wimborne Road
- 12 Hedgerows retained to maintain the 'green approach character' to the village along Wimborne Road
- 13 Existing woodland area retained with potential to create public access and footpath connections
- 14 Public green space also supporting sustainable drainage requirement
- 15 Opportunity to create a safer footpath connection within the site
- 16 New homes set back to front the retained hedgerow along Flowers Drove
- 17 Existing boundary planting retained and strengthened where possible

Concept Masterplan

Sunnyside Farm

Blaneys Corner



Character

4.36 For Sunnyside Farm a new vehicular access with pedestrian footpaths on both sides will be created onto Wimborne Road with new tree and hedgerow planting creating a 'green and leafy' character. The street will gently slope down to access shared surface lanes where a range of cottage style properties will front an informal green.

4.37 By providing 'back-to-back' arrangements between new and existing dwellings, the proposals ensure that the exposed site edges are made secure to establish a safer residential environment. In certain locations reducing the scale of dwellings or creating a 'side (flank) to back' arrangement will also help to provide an appropriate setting to the site edges. Properties fronting onto Flowers Drove will remain set back from the site boundary behind the retained hedgerow and a new access road.

4.38 Where possible new boundary planting can be provided to help strengthen the 'green edge' character. The woodland copse along the northern boundary will be retained to enclose the development and provide opportunities for informal play and woodland walks. A new footpath through the west of the site can be provided to improve pedestrian safety on Flowers Drove and encourage public access to the wooded area at the north of the site.

4.39 For Blaneys Corner the 'green character' and arrival transition into the village along Wimborne Road

will be maintained by the retention of hedgerows and strengthened boundary planting. New homes will be set back to overlook the route and mark a new access created to Wimborne Road.

4.40 A feature village green will be created at Blaneys Corner to mark a point of arrival within the village. The space will be overlooked by new homes and provide a safe area for play and an inviting pedestrian and cycle connection to and from the village.

4.41 A new street links through the development providing an opportunity to connect with Huntick Road. This will further help integrate the new neighbourhoods with the village. This new route will present a traditional street character, with angled turns, bridge crossing and level changes bringing interest and opening up views.

4.42 A sequence of attractive spaces will naturally blend the development within the landscape and support informal recreation, sustainable drainage strategies and provide a sensitive setting to existing dwellings adjoining the development.



Western part of Blaneys Corner showing proposed residential development and the new 'Corner Green' at the junction between Wareham Road and Wimborne Road

Landscape

4.43 Existing trees are to be retained where feasible and planting of new trees will take place across the sites. This will reinforce the sense of village character and deliver a positive response, furthering integration to the wider landscape setting.

4.44 The sites' weaker boundaries will be reinforced with robust landscape screening to enhance the integration of the development into the wider setting by working with the landscape wherein fields are defined by a mix of mature hedgerows and treed hedgerows.

4.45 Sustainable drainage (SuDS) features, such as attenuation ponds will be integrated into the developments utilising the natural contours and locations of existing features within each site, such as the narrow valley corridor in Sunnyside Farm and the low point within the Blaneys Corner site.



Northern part of Sunnyside Farm showing proposed residential development alongside a new area of public green space

Site Access and Movement

4.46 Access into the sites will be sought from Wimborne Road.

4.47 New pedestrian access into the sites will connect with the existing footways on Wimborne Road, with improvements being provided where required. This will provide effective linking to the village centre to the south east which is within 400 metres (five minutes' walking distance of the sites).

4.48 The ability to incorporate 'home zone' features will be explored. This could include prioritising low vehicle movement speeds through the use of materials and adopted lower speed limit(s) within the development.



Proposed site access into Sunnyside Farm



Proposed site access into Blaneys Corner

Drainage and Utilities

Surface Water Drainage Strategy

4.49 To calculate the attenuation storage requirements it has been assumed that 60% of the developable site area will be impermeable catchment. This approach is common practice until a detailed site layout is available.

4.50 Attenuation ponds with volume capacities of 500 cubic metres (Sunnyside Farm) and 890 cubic metres (Blaneys Corner) are provided within the framework masterplans. These are situated near to the lowest points of each site. The attenuation ponds could also be sub-divided into a series of smaller features if necessary.

4.51 Peak rates of discharge will be managed by a series of hydraulic controls with restricted outflow being discharged to the nearest appropriate point, which will be agreed as part of a detailed site layout.

Foul Water Drainage

4.52 Foul water flows on Sunnyside Farm will be capable of discharge to the existing 150mm diameter foul network within the site. Wessex Water has confirmed adequate capacity exists to accommodate the additional flows from the development.

4.53 Wherever possible, foul water flows from Blaneys Corner will discharge to the existing gravity sewers within the site. Any residual discharge not capable of utilising gravity flows will need to be controlled by a new sewage pumping station. This will require an approximate compound area of 12 by 8 metres located at least 15 metres from any habitable buildings. Wessex Water have confirmed that further assessment will be required to determine any reinforcement works that may be needed to accommodate the additional flows generated by the proposed level of development. Discussions with Wessex Water are ongoing to determine actual capacity and any mitigation requirements. This information will be shared with the Council in due course.

Utilities

4.54 A recent utilities search (May 2017) has established that Wimborne Road, Lime Kiln Road and Flowers Drove contain multiple services, including underground low pressure gas mains, virgin media telecoms, South West Water supply mains, BT telecoms and overhead low voltage SSE electricity transmission cable.

4.55 It is expected that the overhead BT cable at the east of Sunnyside Farm will be diverted below ground as part of the development. The overhead electricity transmission cables within and to the south of Blaneys Corner should be capable of being retained in-situ, given that they are unlikely to impact on future development. The option to divert these cables below ground nonetheless remains.



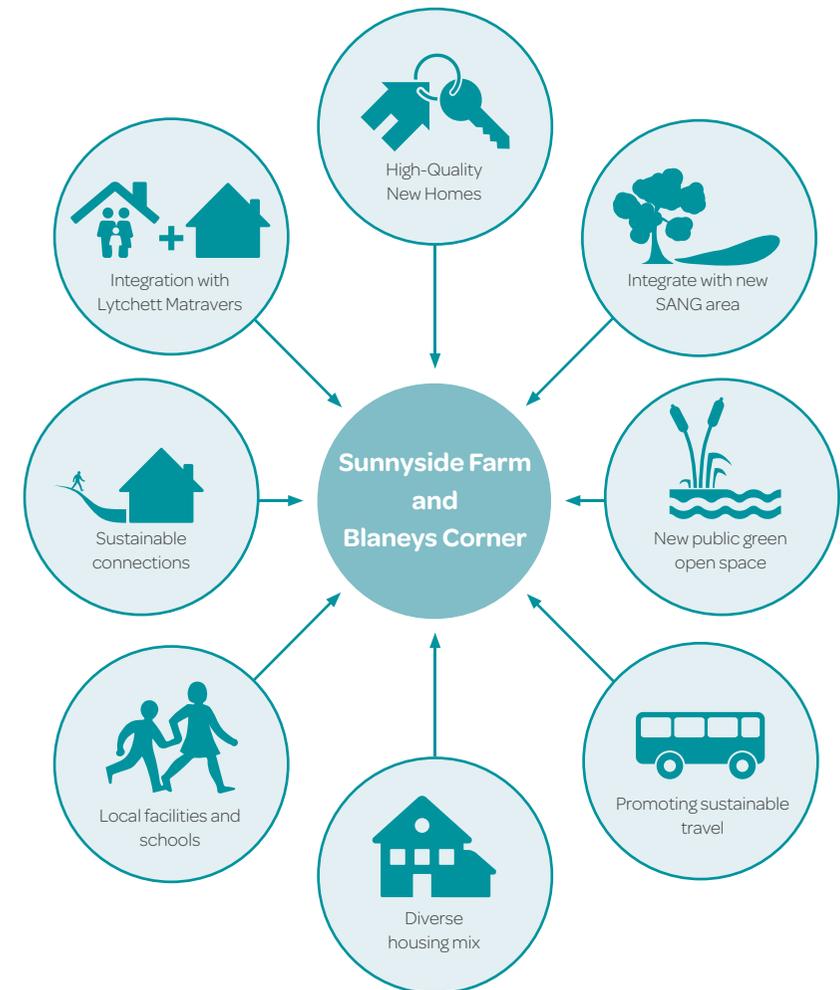
Example of a SuDS feature incorporated into a new residential development

Sustainable Development

4.56 The following features of the development proposed for each of the sites will ensure that sustainable development is achieved:

- The sites are accessible to a range of local facilities within the village centre that are within comfortable walking distance, including convenience retail and health services.
- The site is accessible to existing public transport links to Poole town centre, which provides wider education, retail, employment and health facilities. Development will also increase potential patronage of the local bus services, helping to underpin and secure their long term viability.
- An effective drainage strategy capable of avoiding or mitigating flood risk and emphasising attractive sustainable drainage (SuDs) measures integrating with the new development and the wider landscape character.
- Opportunity to create a new attractive area of Suitable Alternative Natural Greenspace (SANG) within easy walking distance of the sites.

- Emphasis on high quality design, balancing traditional techniques with latest innovation to achieve attractive homes and spaces that will endure and bring delight for decades to come.
- Ensuring that new homes and spaces are resource efficient and embody a 'fabric first' approach and can respond to the threat of climate change by minimising energy, carbon and water use.
- Providing a wide range of housing types, sizes and tenures to help meet the local need for new homes in a sustainable location.
- Allowing for sustainable waste management during construction and operation.
- Promotion of walking and cycling through enhanced access.
- Significant direct and indirect economic benefits to the village.
- Increase in Council Tax and New Homes Bonus revenue supporting local services.



Biodiversity and Nitrogen Neutrality

4.57 The framework masterplans seek to maintain, and where feasible enhance, opportunities for wildlife and existing habitat connectivity. This will be achieved by avoiding, wherever possible, direct or potential indirect loss of the existing ecological on-site habitats, for example, at the minor watercourse traversing Blaneys Corner. The same approach is afforded to species of note that may inhabit the sites, which may include bats and Hazel Dormice, through the retention and reinforcement of boundary hedges and additional landscaping to enhance migratory route connectivity.

4.58 Development of the sites will also enable the delivery of an ecological enhancement and management programme, ensuring a long term positive ecological impact is achieved for both flora and fauna.

4.59 The development of these sites will accord with the guidance outlined within the adopted Nitrogen Reduction in the Poole Harbour Supplementary Planning Document (April, 2017).



SANG Mitigation

4.60 Development on these sites will require delivery of appropriate Suitable Alternative Natural Greenspace (SANG) to mitigate the otherwise adverse impact(s) that may result on the Dorset Heathlands and Poole Harbour Special Protection Areas (SPAs). Discussions with Natural England regarding appropriate opportunities for SANG mitigation are ongoing. From these discussions, it has been agreed, in principle, that a new SANG area should be provided, located in close proximity the north east of the sites on land fully within the control of Wyatt Homes.

Wyatt Homes Proposed New SANG

4.61 Wyatt Homes are proposing to create a new SANG to the north of Lytchett Matravers on land to the east of Flowers Drive.

4.62 The proposed new SANG comprises an area of approximately 7.3 hectares of currently undeveloped agricultural land. The creation of the SANG will result in improvements to the biodiversity and visual landscape character of the land. This will include retention and improvement of the existing ponds, retention and management of the existing trees and hedgerows alongside reinforcement and proposed new native scrub, hedge and tree planting.

4.63 The SANG will provide a circular walking route designed to deliver links to the wider existing public rights of way around the village. The walking route within the SANG will predominantly be unsurfaced to maintain an appropriate semi-natural feel. It is also proposed to create a small car park capable of accommodating approximately 7 vehicles at any one time.

4.64 The SANG is located within approximately 200 metres to the north of both sites and will provide an appropriate means of mitigating the potential impacts upon the SPAs, which themselves are located approximately 3 km (Dorset Heathlands) and 2.5 km (Poole Harbour) from the sites (straight line distances).





- Proposed access
- Proposed car park
- New wildlife pond
- Existing pond
- Retain existing hedgerow and enhance with new native planting
- Retain and manage existing trees
- Flower's Drove SANG
- Proposed tree planting
- New native scrub planting
- Retain meadow and manage to improve species diversity
- Retain existing hedgerow and enhance with new native planting
- Opportunity to create a safe pedestrian route along roadside
- Corner site

Sunnyside Farm

Blanneys Corner





Aerial view: Illustrative perspective sketch

Conclusions

Summary

5.1 The proposals for Sunnyside Farm and Blaneys Corner have been developed on a more detailed understanding of the sites than that available to the Council at the earlier stages of preparation of the local plan. The site specific work carried out to date by Wyatt Homes has established that the sites have a combined capacity to deliver approximately 90 new homes through the creation of two high quality and well-linked new places befitting the village's identity and the qualities of the wider landscape context.

5.2 This sites will deliver the sustainable development of much needed new homes in the District, in full compliance with the policies of the NPPF. The sites represent appropriate infill opportunities, capable of rounding-off the village and making a positive contribution to the village's character, but without detriment to the wider landscape setting.

The Way Forward

5.3 Moving forward, the sites technical attributes will continue to be assessed by Wyatt Homes and the development proposals for the sites will continue to be refined. All technical work and survey findings will be shared with key stakeholders, including the District Council and the Parish Council. Input will also be drawn from local residents in the form of public engagement, the feedback from which will further inform the development proposal.

5.4 Wyatt Homes are proud to be working on the delivery of much needed new homes at Lytchett Matravers and would like to fully engage with all relevant stakeholders as they progress their development proposals. As a local developer Wyatt Homes seeks to consolidate its reputation and will deliver high quality developments at these sites to enhance the character of the village, creating a strong identity and sense of place.

Appendix 1

Supporting Documents

Supporting Document	Prepared by
Ecological Appraisal	Hankinson Duckett Associates
Landscape and Green Belt Report	Hankinson Duckett Associates
Highway, Flood Risk and Drainage Technical Note	AWP
Tree Survey	Barrell Treecare

3001



3002

For further information contact

Peter Home

WYATT
HOMES

Comment

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Address	1 Parkstone Road Poole BH15 2NN
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wyatt Homes (- 1190024)
Comment ID	PLPP478
Response Date	03/12/18 17:16
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H3: New housing development requirements
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The Council expects all proposals for new housing development on allocated sites to comply with criteria a-m of Policy H3. The majority of the policy criteria cause no particular concern for our client. However, a concern is raised elsewhere in these representations in relation Policy H9 (Housing Mix) which is referenced within Policy H3. In addition, Wyatt Homes makes the following comments in relation to criteria c) and i) of Policy H3.

Criterion c)

Criterion c). sets out that all proposals for new housing development on allocated sites will be expected to deliver appropriately designed suitable alternative natural greenspaces (SANGs) to both avoid and/or mitigate the potential adverse effects from the new homes on European sites. It is considered unlikely that SANGs, as a mechanism delivered alongside development, can 'avoid' the adverse effects from the new homes on European sites and these are much better understood as a method of mitigating the impacts on the protected areas rather than being able to avoid it altogether.

This conclusion is supported by Appendix E of the Dorset Heathlands Planning Framework (2015-2020) SPD states:

"Suitable Accessible Natural Greenspace is the name given to green space that is of a quality and type suitable to be used as mitigation for applications likely to affect the Dorset Heathlands European and internationally protected sites... SANGs are intended to provide mitigation for the likely impact of residential type developments on the Dorset Heathlands by preventing an increase in visitor pressure. The effectiveness of SANGs as mitigation will depend upon its location and design."

The Dorset Heathlands Planning Framework therefore confirms that the provision of SANGs is an effective means of mitigating, rather than avoiding, harm on the Dorset Heathlands.

Criterion i)

Criteria i). refers to including survey information that identifies important trees and providing details for their retention and protection whilst construction work is taking place. Whilst we are content with the purpose of this criterion, we consider that it is not appropriate to require that all important trees are retained, as this may not be practicable or appropriate to do so in order to deliver the development.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Criterion c)

For the purposes of consistency and clarity with the evidence base, we recommend that the wording of criteria c). in Policy H3 is amended to clarify that the SANGs role is to provide 'mitigation' and to remove reference to the word 'avoid'.

Criterion i)

We request that this element of Policy H3 is amended to provide greater flexibility where an arboricultural assessment has taken place and concluded that it would be appropriate for one or more 'important trees' to be removed. To that end, we suggest the following revised wording for criterion i):

*"include survey information that identifies important trees, and provide details for their retention and protection, **where practicable and appropriate to do so**, whilst construction work is taking place."*

We also consider that the policy should clarify what trees are considered 'important'. We would recommend that this is clarified within the supporting text or within the Glossary.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Wyatt Homes has a range of interests across the north east of the district, a number of which are being proposed for allocation by the Pre-Submission Purbeck Local Plan. Whilst our client is generally supportive of the Local Plan, there are a number of areas where there is concern that the Local Plan, as drafted, is not yet 'sound' but can be made so through a range of plan modification that we have proposed. Our client considers it important to attend the hearing sessions to assist the Council in exploring the areas where the plan is not yet sound and reaching a position whereby it may become so.

Comment

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Consultee	(1190024)
Company / Organisation	Wyatt Homes
Address	1 Parkstone Road Poole BH15 2NN
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wyatt Homes (- 1190024)
Comment ID	PLPP479
Response Date	03/12/18 17:17
Consultation Point	Policy H6: Lytchett Matravers (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H6: Lytchett Matravers
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Our client is broadly supportive of Policy H6 (Lytchett Matravers) which proposes to provide up to 95 homes at Land East of Wareham Road, 25 homes on land at Blaneys Corner and up to 30 homes on land to the east of Flowers Drove. There are however, three specific elements within the policy where our client wishes to comment and request that modifications are made.

Expression of the housing delivery numbers

It is noted that Policy H6 uses the phrase “up to” to describe the number of dwellings that are anticipated for each of the Lytchett Matravers sites. Our client sees no justification for this limit to site specific delivery numbers within a strategic-level local plan such as this. Indeed, when applied to all allocation sites the approach would appear to be at odds with Policy H1 (Local Housing Requirement) which establishes that, over the plan period, “at least 2,688 homes will be required”.

It is acknowledged that the Council may wish to guard against overly dense development schemes, but that should be achieved through appropriate design policies and not through seeking to place a ‘hard cap’ on delivery numbers within a strategic allocation policy. As drafted, that aspect of Policy H6 would appear to be inflexible and unsupported by robust evidence that sustainable development proposals for these sites cannot achieve any higher number of dwellings than those proposed. Therefore, the use of “up to” in Policy H6 is **not justified** in relation to the ‘tests of soundness’.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

In order to address this, our client recommends that “up to” be replaced by “at least”, which would be consistent with the approach taken in Policy H1. If that proves not to be acceptable, the term “around” should be used in place of “up to”.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Wyatt Homes has a range of interests across the north east of the district, a number of which are being proposed for allocation by the Pre-Submission Purbeck Local Plan. Whilst our client is generally supportive of the Local Plan, there are a number of areas where there is concern that the Local Plan, as drafted, is not yet ‘sound’ but can be made so through a range of plan modification that we have proposed. Our client considers it important to attend the hearing sessions to assist the Council in exploring the areas where the plan is not yet sound and reaching a position whereby it may become so.

Comment

Agent	Mr Peter Home (1190022)
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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wyatt Homes (- 1190024)
Comment ID	PLPP481
Response Date	03/12/18 17:21
Consultation Point	Policy H6: Lytchett Matravers (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Delivery Framework for Blaneys Corner and Sunnyside Farm (revised December 2018) (1)
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H6: Lytchett Matravers
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Size of site allocation at Land at Blaneys Corner

We note that the proposal is to allocate land at Blaneys Corner to provide 25 new homes, within a site that omits to eastern parts of the site as promoted by Wyatt Homes (see the Delivery Framework: Sunnyside Farm and Blaneys Corner submitted alongside these representations). Our client remains of the view that whilst a scheme would be possible to take forward as envisaged by the Council the full opportunities presented by the site and the optimal benefits of the scheme will only be realised if the site allocation is extended to include these eastern parts of the site, thereby increasing capacity to accommodate around 60 new dwellings.

Following the Council's Local Plan Review Options Consultation in 2016, our client submitted a Delivery Framework document for Sunnyside Farm and Blaneys Corner (in October 2017). This promoted the larger site for residential development at Blaneys Corner and provided an illustrative masterplan. To inform the preparation of the masterplan, a range of technical site assessment work was undertaken, including: Ecological Appraisal, Landscape and Green Belt Report, Highways, Flood Risk and Drainage Technical Note and an Arboricultural Survey.

Our client considers that releasing this additional land from the Green Belt would not result in harm to the aims and purposes of the Green Belt, as outlined in paragraph 134 of the NPPF, and this has been demonstrated through an independent Green Belt assessment undertaken by Hankinson Duckett Associates (HDA) who has been commissioned by our client to undertake this work. This independent assessment is submitted alongside these representations.

HDA's assessment concluded that the overall contribution of the larger site towards the purposes of the Green Belt was considered 'Low' and that the larger site could be developed without harm to the aims and purposes of the Green Belt. The larger site as a whole is considered to be well-enclosed and well related to the existing settlement in Lytchett Matravers. A row of five dwellings is located to the north-east of the site on Wimborne Road, east of the Public Right of Way. These properties are associated with the village, despite being located outside the settlement boundary set out within the adopted Local Plan. The eastern extents of the site, as proposed by Wyatt Homes, do not extend as far as dwellings and therefore does represent any more significant an extension to the village along the Wimborne Road.

Furthermore, the existing eastern boundary of the larger site, which comprises a strong tree belt and hedgerow boundary with an established Public Right of Way beyond, would form a robust Green Belt boundary. This eastern boundary would be significantly more robust and permanent than would the arbitrary line, unmarked by any permanent features, that is proposed by the Council as the easternmost extent of the development.

Our client considers that the larger site offers the ability to create an enhanced scheme in design terms through provision of additional areas of public open space. This will be achieved through the creation of a new 'corner green' for the village which is envisaged to act as a welcoming village arrival space at the junction of Wimborne Road and Wareham Road. In addition to the public open space, this will greatly improve on existing pedestrian connections to and from the village. However, these benefits are only possible to achieve alongside the larger scheme as the main vehicular access point could be taken further east on Wimborne Road, east of the former Royal British Legion building. Conversely, the Council's preferred scheme would necessitate a vehicular access near to the Wimborne / Wareham Road junction and this would preclude delivery of meaningful open space in this western part of the site.

The Delivery Framework document also demonstrates that the proposal for the larger site would be significantly enhanced in sustainability terms. The benefits of this approach include the ability to deliver an improved location for the vehicular access point on Wimborne Road, as described above, which will result in improved pedestrian connections from the village through the site to the existing Public Right of Way and beyond that, to the proposed SANG area to the north of Wimborne Road. It would

also facilitate the delivery of new pedestrian and cycle connections to the existing allocated site on Huntick Road. This in turn would deliver a meaningful contribution to the community's aspiration for improved pedestrian routes and access from the village to the adjacent countryside areas.

It is considered that the benefits achievable through enlarging the Blaneys Corner site would be entirely consistent with the 'made' Lytchett Matravers Neighbourhood Plan, for example, Policy B: Good Design. As described above, the larger scheme would assist in the delivery of local community aspirations, for example, those within the Neighbourhood Plan's Objective 3: Village Walking/Cycling/Transport.

Reflecting the above points, our client's masterplan for the Land at Blaneys Corner demonstrates that expanding the allocation to include the eastern parts of the site will result in a scheme which will create a well-designed, attractive and healthy place to live and will enhance and maintain the area's prevailing character, consistent with paragraph 122 of the NPPF. Equally, Wyatt Homes believe that the omission of the eastern fields from the potential site allocation is not a logical approach or one that is consistent with good planning and place-making. Indeed, it represents a wasted opportunity.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Wyatt Homes request that the Blaneys Corner allocation is extended as to the full site promoted by Wyatt Homes to achieve around 60 dwellings in addition to the full range of planning, design and sustainability benefits referred to above. We can confirm that, should the larger site be allocated, our client's proposed SANG area (amounting to 7.3 hectares), to the north of Wimborne Road would have sufficient capacity to ensure that the impacts of the larger development on the Dorset Heathlands could be appropriately mitigated.

If you have any supporting documents please upload them here.

[Delivery Framework for Blaneys Corner and Sunnyside Farm \(revised December 2018\) \(1\)](#)
[Delivery Framework for Blaneys Corner and Sunnyside Farm \(revised December 2018\)](#)

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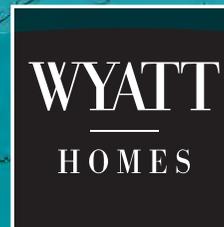
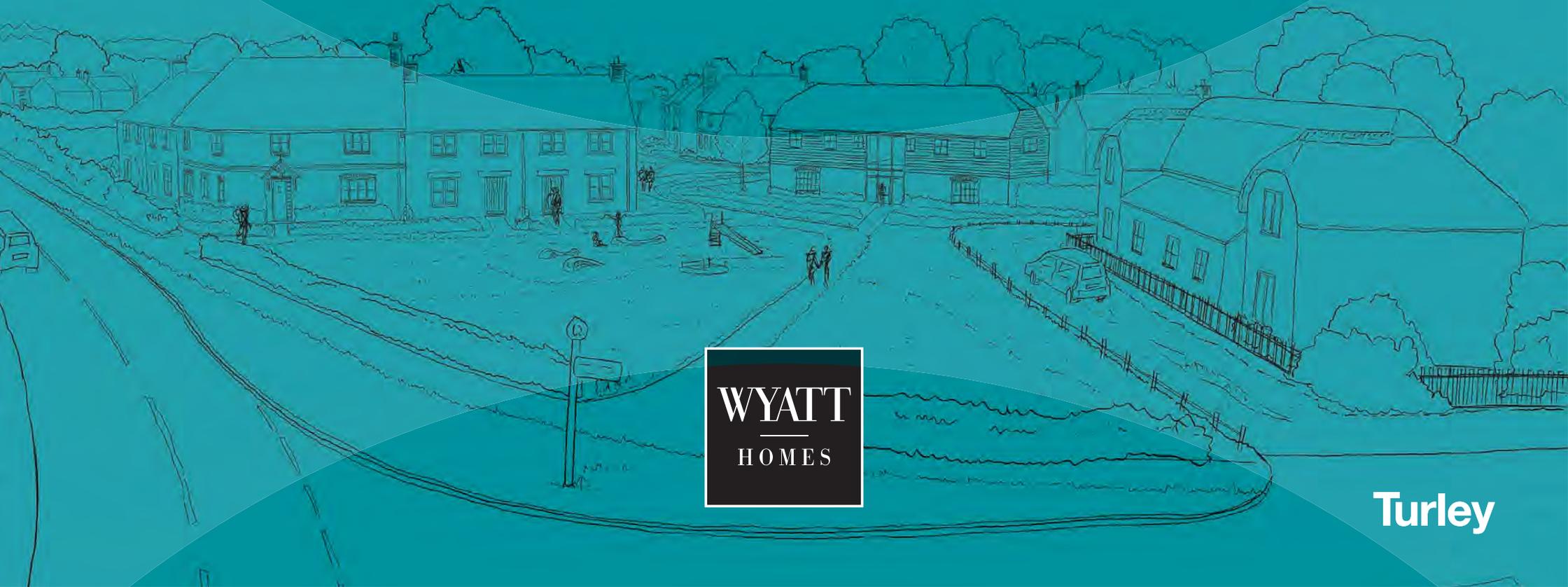
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A Delivery Framework

Sunnyside Farm and Blaneys Corner, Lytchett Matravers

Response to the Pre-submission Purbeck Local Plan Consultation

December 2018



Turley

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Appendix 1: Supporting Documents

Introduction

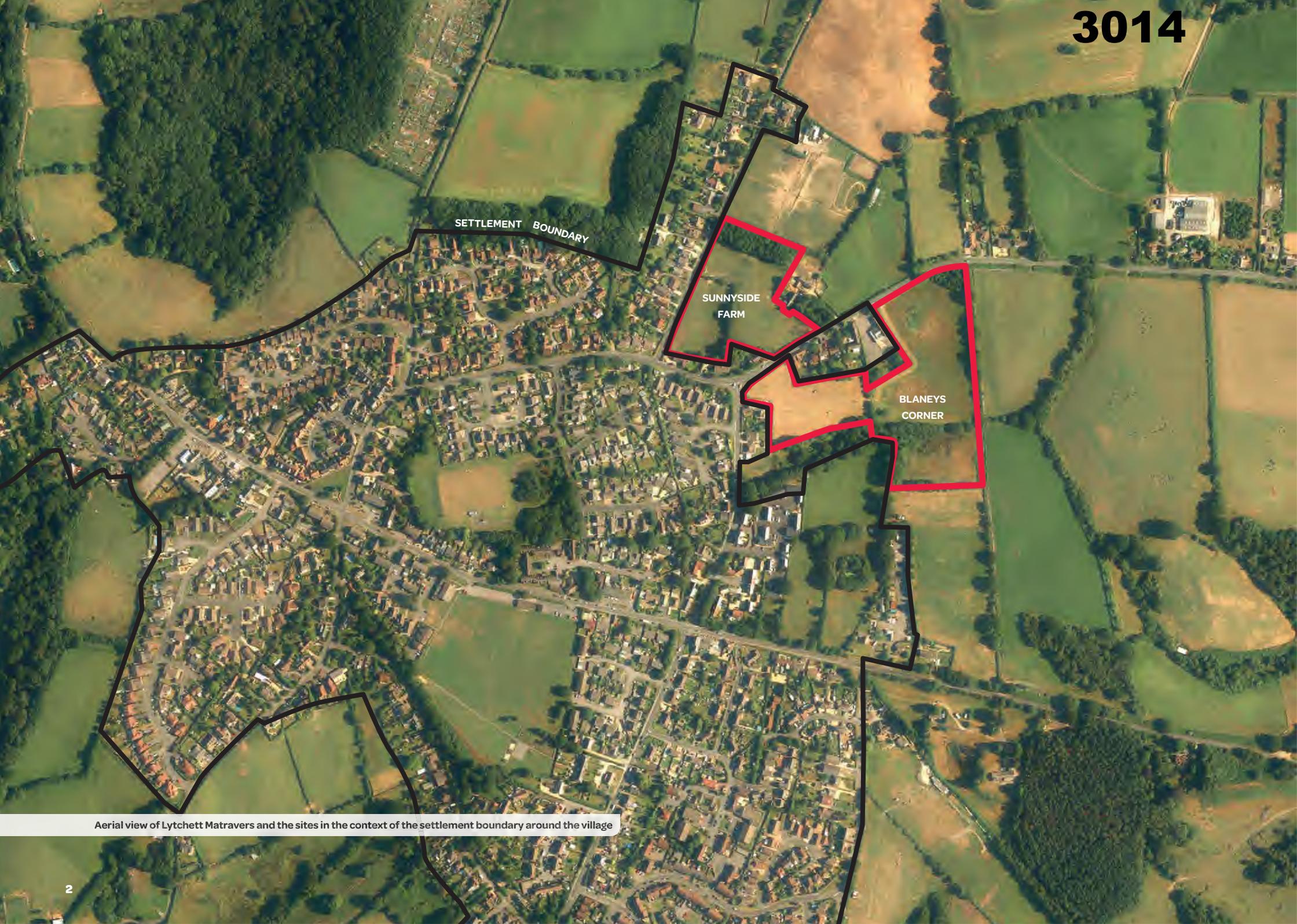
This Delivery Framework has been prepared on behalf of Wyatt Homes to support the Council's identification of Sunnyside Farm and Land at Blaneys Corner, Lytchett Matravers as proposed residential allocations in the emerging Purbeck Local Plan.

1.1 The aim of this document is to articulate the development potential of the sites and to support the proposed site allocations to deliver sustainable growth of up to 90 homes to help meet the District's housing needs during the emerging plan's period to 2034.

1.2 The document articulates:

- The Planning Context – a broad summary of the strategic development opportunity
- The Place – an appreciation of context and constraints, including key observations and responses
- The Proposal – the development potential and opportunities presented by the sites, including high level concept layouts

1.3 This document presents the two sites as a collective opportunity. With regard to Blaneys Corner, it is acknowledged that this document includes an area of land that is not included within the proposed site allocation identified within the Pre-submission Purbeck Local Plan.



SETTLEMENT BOUNDARY

SUNNYSIDE FARM

BLANEYS CORNER

Aerial view of Lytchett Matravers and the sites in the context of the settlement boundary around the village

Wyatt Homes

1.4 Wyatt Homes is a long established and privately owned house building company, based in the South West. The company's aim is to design and build properties of exceptional quality, without compromising on materials or attention to detail. With this focus the high quality homes and places designed and built by Wyatt Homes over the past quarter of a century have brought satisfaction to their occupiers and enhanced the character of local communities. Wider recognition has also been achieved through the awards the company has won for exemplary quality, design and craftsmanship.

The Delivery Framework

1.5 It should be noted that the proposals set out in this document represent 'work in progress'. They will continue to be refined and informed by ongoing and further technical work being carried out by Wyatt Homes' appointed team of specialist consultants who have extensive experience in the delivery of sustainable new developments through the planning process.

1.6 Whilst this document can be read on its own, it is supported by a range of technical assessments and reports which have informed the understanding of the sites and their development potential. These documents were also previously submitted to the Council and a full list of the documents is set out in **Appendix 1**.



Examples of high quality homes delivered by Wyatt Homes

The Planning Context

Purbeck District Council adopted the Purbeck Local Plan Part 1 (PLP1) in November 2012 and commenced its Local Plan Review consultation process in late 2014 / early 2015.

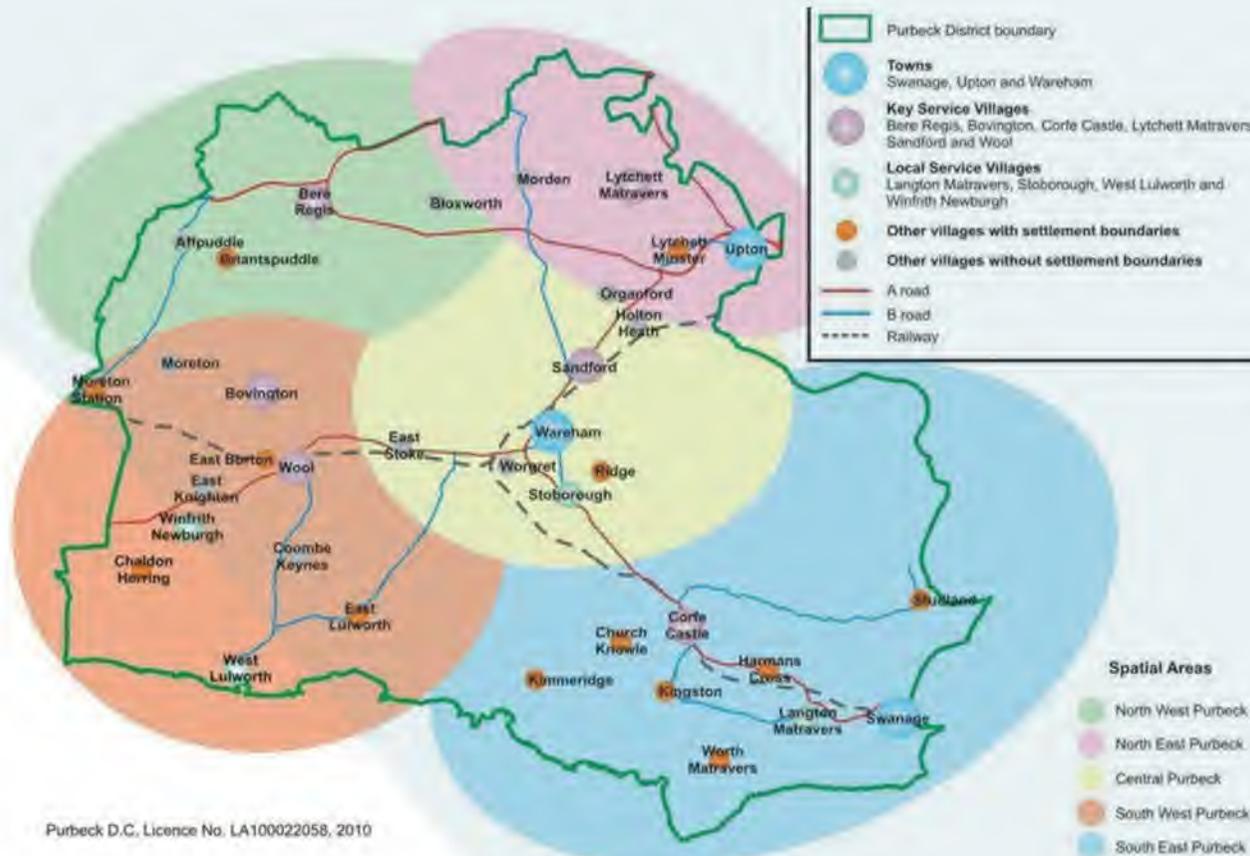
2.1 The PLP1 is already planning for the delivery of 2,520 new homes during the Plan's period of between 2006 – 2027, equating to an annual delivery target of 120 homes per year. The PLP1 sets a long term vision, objectives and planning policies to steer and shape development across the District.

2.2 However, at the Examination of the PLP1 the Inspector raised concerns that the Council had not sufficiently explored the full housing growth potential in the District to meet its objectively assessed housing need (as it was identified at that time). The PLP1 was therefore adopted on the requirement that a review of the Plan be undertaken by 2017 - specifically to look at the potential for delivering higher growth. The Council commenced work on the Partial Review in late 2013 and between January and March 2015 consulted on an Issues and Options consultation document.

2.3 In June 2016 the Council formally carried out a further 9 week consultation on an Options Partial Review Local Plan document. The Options document confirmed that the adopted PLP1 was failing to deliver enough homes to meet the District's objectively assessed housing needs as identified by the Final Eastern Dorset Strategic Housing Market Assessment (SHMA) in the period 2013 - 2033.

2.4 In January 2018 the Council undertook a consultation on a range of options for the local plan, including on broad areas for residential growth. The results indicated that that the local community were more likely to support housing options that spread development across Purbeck.

Purbeck's settlements and its spatial areas



2.5 An update of the 2015 Eastern Dorset SHMA was published in August 2018, indicating a local housing need of 168 homes per year, or 2,688 homes over the 2018 to 2034 local plan period. This housing need is now being proposed within the Pre-submission Purbeck Local Plan that was published in November 2018.

2.6 The approach set out within the January 2018 housing options consultation that was most preferred by the local community has been carried forward into the Pre-submission Purbeck Local Plan. This involves the proposed allocation of a range of sites across the District, including (as set out within Policy H6) Wyatt Homes' sites at Blaneys Corner and Sunnyside Farm (known in the local plan as Land east of Flowers Drove).

2.7 The Pre-submission Purbeck Local Plan is supported by a considerable number of recent technical evidence documents, including the Sustainability Appraisal (2018), Environmental Capacity Study (2017), Green Belt Studies (2016, 2017 and 2018) and the Housing Background Paper (2018). Each of these documents supports the case for allocating the sites. However, in the case of Blaneys Corner, the proposed allocation is smaller than the site promoted within this document, allowing for the delivery of 25 homes as opposed to the scheme for 60 homes set out here.

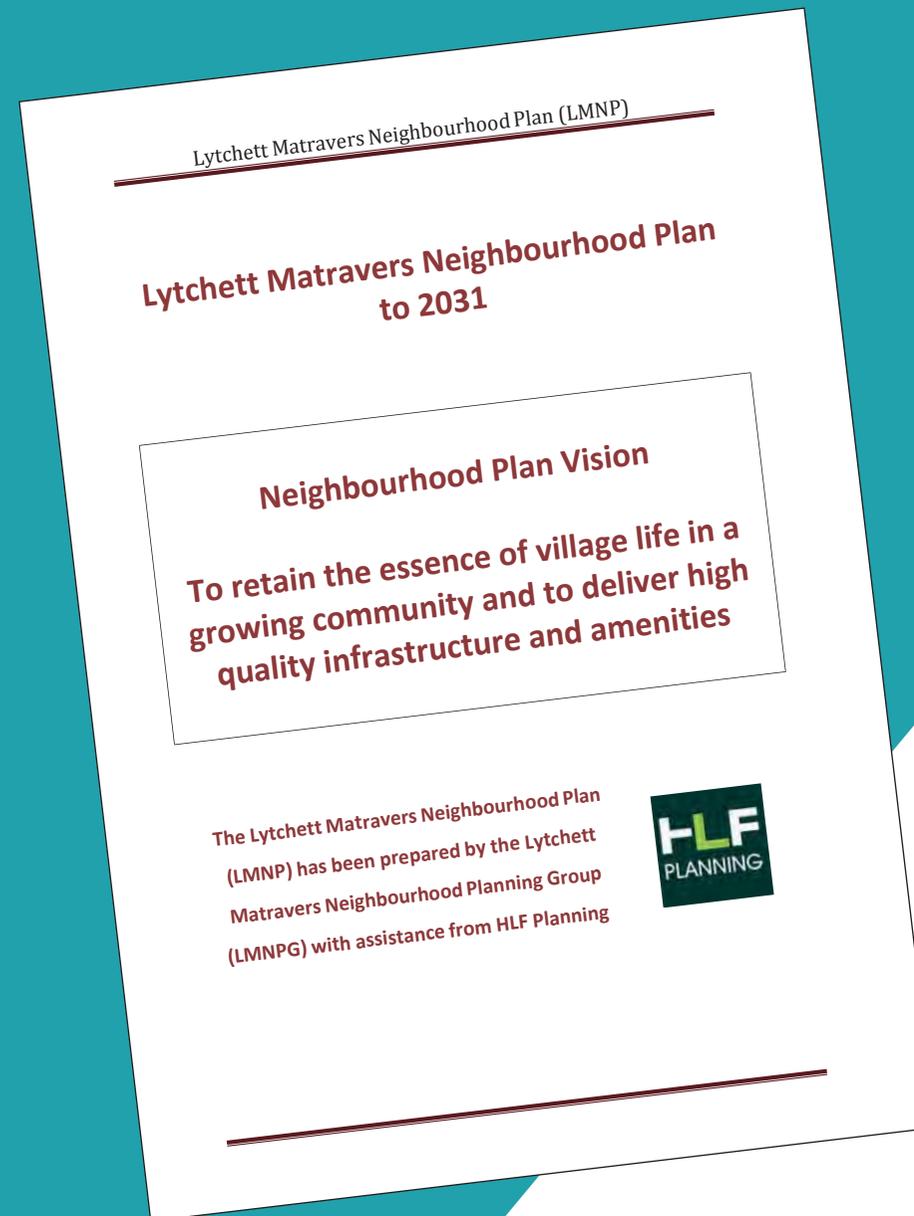
The combined capacity to deliver housing at the two sites was identified within the 2016 Options document, and its supporting evidence base, to be approximately 90 new homes (30 homes at Sunnyside Farm and 60 homes at Blaneys Corner).

The Lytchett Matravers Neighbourhood Plan

2.8 In June 2017 the Lytchett Matravers Neighbourhood Plan (NP) was made. The NP does not allocate sites recognising that the village is currently surrounded by designated Green Belt land requiring all future housing sites beyond the defined settlement policy boundaries to be brought forward as part of the Local Plan process.

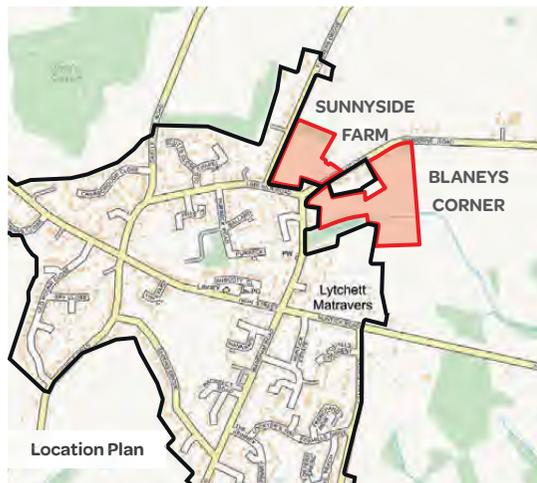
2.9 The NP sets out the community's overall vision for the village which is based upon retaining the essence of village life in a growing community and to deliver high quality infrastructure and amenities in the years to 2031. The Plan acknowledges that there is a significant shortage of available housing across the region and that while Lytchett Matravers will inevitably be required to provide more housing to meet local needs over the coming years, any development needs to align with the NP's vision and objectives. Some of the key cited objectives include:

- meeting the housing needs of all who want to live in the village
- promoting walking and extending the existing village footway network
- and, promoting a regular viable set of village bus services to serve the community.



The Place

Combined, the sites comprise an area of 5.68 hectares located to the north of Lytchett Matravers.



Location

3.1 The sites are adjacent, separated by Wimborne Road. Sunnyside Farm has an area of 1.86 hectares, whilst that of land at Blaneys Corner is 3.82 hectares.

3.2 The land at Sunnyside Farm comprises three small fields in agricultural use. The site is surrounded on three sides by existing development, ranging from single storey bungalows to two storey properties (to the east, south and west). Along the northern boundary and extending into the site by approximately 25 metres, there is a copse of woodland consisting of a mix of Ash, Birch, Lime and Sweet Chestnut. There is a further belt of trees beyond the site's north-east boundary. The boundary hedges to the west (fronting Flowers Drove) and south east are continuous and approximately 1.5 – 2 metres in height. Internal definition is provided to the three fields by low level post and wire fencing. There is a change in gradient across the site, undulating from south-to-north and rising east-to-west.

3.3 Land at Blaneys Corner consists of three fields in agricultural use, contained by development to the north-west on Wimborne

Road and south-west on Wareham Road. These properties range from single storey to two storeys. To the south, the site adjoins the allocated housing site fronting onto Huntick Road. Wyatt Homes are currently preparing a full planning application for the development of 46 dwellings at this site.

3.4 The boundaries of the land at Blaneys Corner site include a range of hedges, trees and mature wooded belts. Internal field definition is provided by a mix of hedges and some stock - proof fencing. The site has two sections of frontage onto Wimborne Road along its northern boundary. There is a change in gradient across the site initially dipping down and rising again from south-to-north with a more gentle undulating change from east to west.

3.5 Beyond the immediate boundaries of both sites, the landscape to the south and west comprises the built up area of northern Lytchett Matravers. To the north and east, the landscape is more rural comprising agricultural fields defined by hedgerows and belts of trees, small areas of woodland and a few residential properties.

Key Features and Characteristics



Tesco Express in the village along the High Street



Bus stop on Lime Kiln Road



Recreation ground looking towards the village hall



Entrance to Lytchett Matravers Primary School

A Sustainable Place

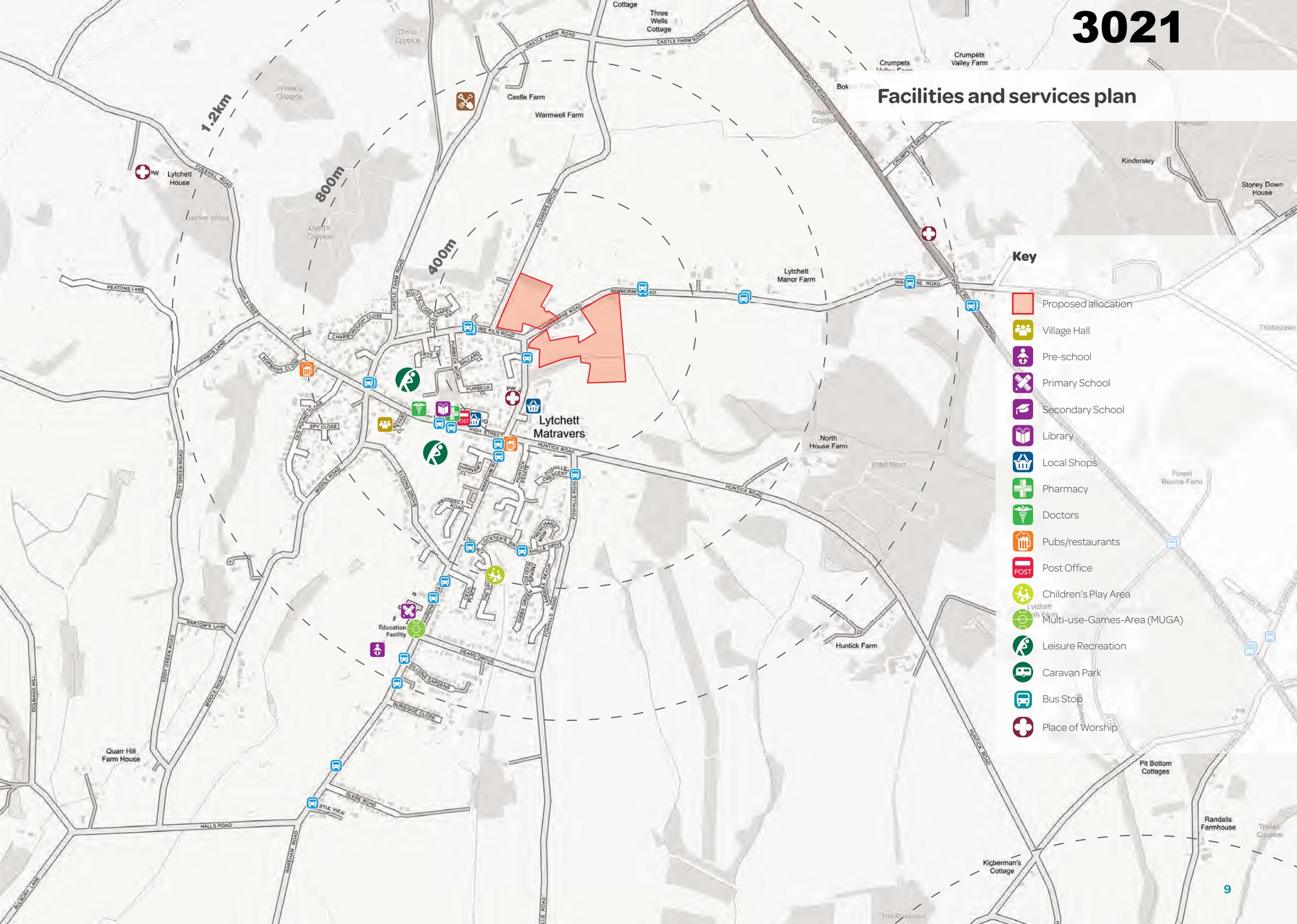
3.6 The adopted Local Plan includes a 'settlement hierarchy' to focus the distribution of development across the District and to define the role of its settlements. This established hierarchy is being carried forward as part of the Local Plan Review. Lytchett Matravers is identified as one of the District's six Key Service Villages wherein it is a location where new development is to be focused given the existing community, cultural, leisure and other types of development that are already present. In short, the village is capable of supporting sustainable development and the sites represent sustainable locations, with existing development to the south and west.

3.7 Within the village there is a range of facilities (listed below) that will assist in delivering a sustainable development:

- The village centre is located approximately 400 metres (5 minutes' walk) to the south-west of the sites. The village has a number of local facilities including; a Tesco Convenience Store, a Post Office, Public Houses, a library, GP surgery, pharmacy, a Church and the Parish Hall.

- Employment opportunities are available at Freeland Park (a modern development of office and light industrial units) located within the village.
- The nearest bus stop is positioned on Lime Kiln Road, around 50 metres to the west of Sunnyside Farm (less than 1 minutes' walk). This is served by bus route no.10 providing an hourly service connection between Lytchett Matravers and Poole town centre (via Poole railway station) throughout the day (Monday to Saturday).
- The Lytchett Matravers Pre-School and Primary School, located on Wareham Road, is within approximately 1,000 metres of the sites.
- The site is within the catchment area of Lytchett Minster Comprehensive School which is approximately 2.25 km to the south east of the site. The School is accessible by school bus service 718 that stops at the Wareham Road bus stop, 5 minutes' walk (400 metres) to the south of the sites.
- The sites are within approximately 300 metres of the Lytchett Matravers Village Green playing fields. The site also benefit from close proximity to a number of existing green and open spaces located elsewhere in the village, including the Multi-Use-Games-Area (MUGA) located adjacent to the Lytchett Matravers Pre-School and Primary School to the south.

Facilities and services plan



Connections



3.8 Wimborne Road is a two-way public highway with a speed limit of 30mph, rising to 40mph to the east of the former Royal British Legion (RBL) building. At present there is a dedicated pedestrian footpath along the southern side of Wimborne Road which ends at the former RBL's curtilage. Lime Kiln Road and Wareham Road each have 30mph speed limits with pedestrian footpaths along at least one side of the lengths of these routes. Flowers Drove is a more restricted carriageway at approximately 4.5m width along the majority of the section passing along the Sunnyside Farm site's western boundary. There are currently no dedicated footpaths along this section of Flowers Drove with pedestrians currently needing to share the highway space.

3.9 Awcock Ward Partnership (AWP) has assessed the sites in relation to immediate proximity to infrastructure. This assessment has concluded that the sites are accessible to a range of local facilities, including convenience retail stores, health services and primary education. There are existing public transport services linking to Lytchett Minster School and to Poole town centre. Poole town centre provides for a variety of employment, education, healthcare and retail opportunities, in addition to access to the national railway network. Therefore, the development of the sites for new homes will also generate an increase in the potential patronage for the existing local bus services in the village, reinforcing their longer term viability.

3.10 There are a number of bus stops located to the east, west and south of the sites and within the wider village itself. The sites also benefit from easy access to the main road A350 to the north-west and the main road A35 to the south providing road links to Upton, Poole and beyond.

3.11 There are a number of established Public Rights of Way (PROW) surrounding the village. Immediately adjacent to the eastern boundary of the Blaneys Corner site is the PROW SE 17/23. The Lytchett Matravers Neighbourhood Plan seeks to enhance, promote and extend the footpath network around the village.



Morebus No.10 traveling along Lime Kiln Road.

Landscape and Visibility



View looking north-east from Wimborne Road, opposite the eastern boundary of Sunnyside Farm.



View looking north-west from Wimborne Road opposite the north-eastern boundary of Blaneys Corner



View looking north from footpath SE 17/23 adjacent to the eastern boundary of Blaneys Corner

3.12 Hankinson Duckett Associates (HDA) has carried out comprehensive Landscape and Visual Analysis, which will be submitted in support of this Delivery Framework.

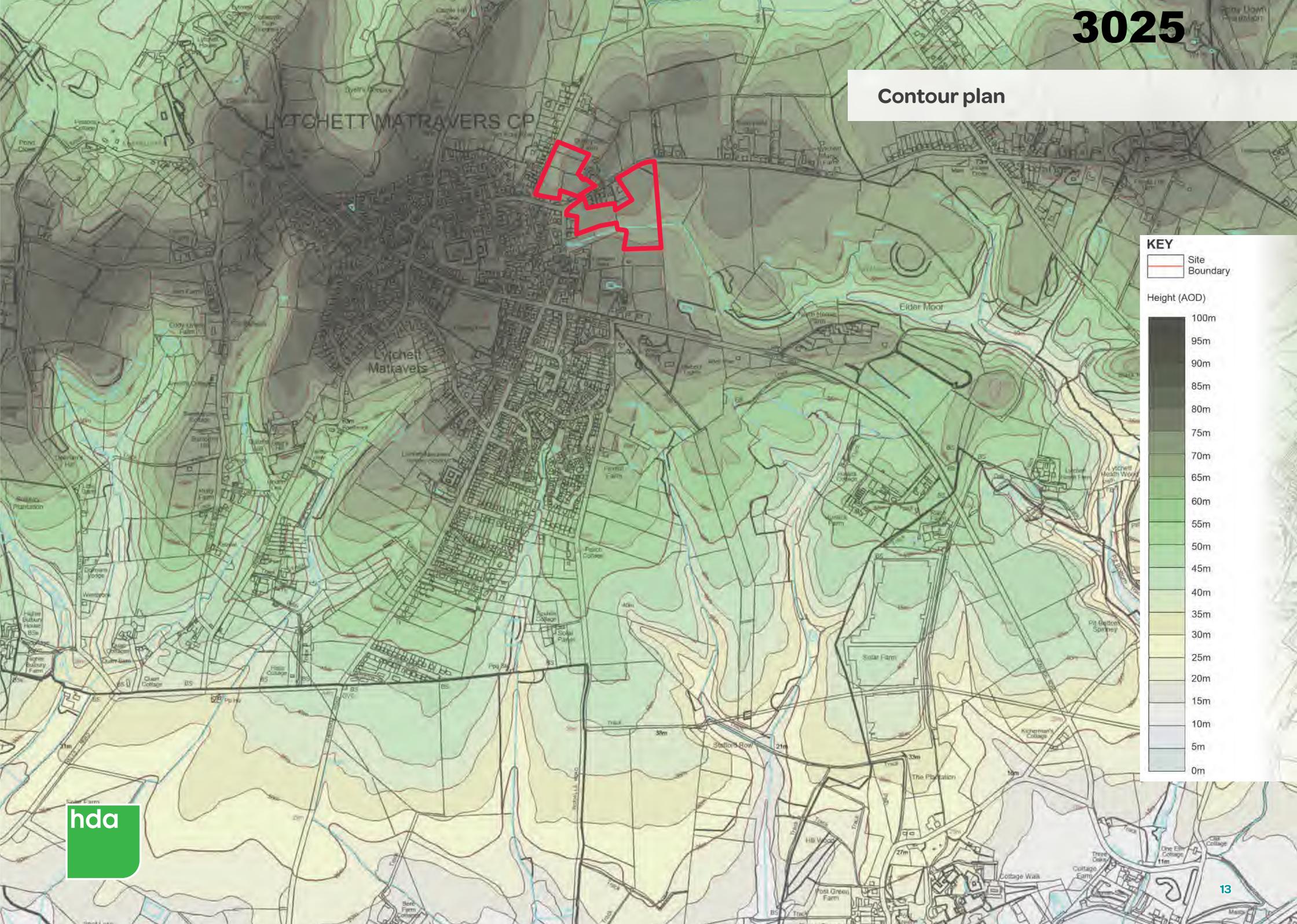
3.13 The sites are located to the north and north east of the village's existing and planned built up area. The village itself is situated on a broad ridge of high ground, which generally runs east to west with branches to the north and south. A plan showing the contour level changes across the village and wider surrounding area is presented opposite. The elevated position of the village affords some long distance views over the surrounding rural landscape with some long distance views of Poole also visible to the south-east. The ridge is incised by valleys, particularly to the south, with watercourses that flow south to Sherford River and Lytchett Bay. The sites themselves are not located on the highest ground levels but on land falling away from them. The Sunnyside Farm site has a high point of 81 metres AOD, akin to the higher ground levels elsewhere in the village.

3.14 The Dorset Landscape Character Assessment identifies 22 character areas across the County. The sites are situated within The Rolling Wooded Pasture character area. The key characteristics of the Morden / Lytchett Rolling Wooded Pasture are considered to include: open views from elevated points; harmonious links between the natural and woodland blocks; the folded intimate valley forms around Lytchett Matravers; and the hedgerows and woodland blocks giving the impression of a well treed landscape.

3.15 The sites are well related to the existing settlement and predominantly visually well contained from the wider landscape by existing copses of woodland and mature treed and non-treed hedgerows.

3.16 Views of the sites are largely restricted to receptors within the existing settlement, i.e. limited views from the rear of properties on Wimborne Road and Wareham Road and the front of properties on Flowers Drove. There are partial views of the eastern area of Blaneys Corner from Wimborne Road where the site frontage shares its boundary with the road. Longer distance views of the sites are restricted to limited glimpsed views, i.e. from the public footpaths in the vicinity of the sites through intermittent gaps in the existing vegetation. These views are capable of being mitigated through additional reinforced planting on the site boundaries. In landscape and visual terms, the sites are capable of being developed without harm to the surrounding landscape character but with appropriate design being required to ensure that key landscape features are retained and reinforced.

Contour plan



KEY

- Site Boundary

Height (AOD)

100m
95m
90m
85m
80m
75m
70m
65m
60m
55m
50m
45m
40m
35m
30m
25m
20m
15m
10m
5m
0m



Green Belt

3.17 The Purbeck Local Plan Part 1 established the current extent of the Green Belt within the District. Lytchett Matravers is an inset village within the South East Dorset Green Belt. As part of the review of the Local Plan, the Council carried out and published Green Belt Review studies in 2016, 2017 and again in 2018. These involved the assessment of a number of sites located around key Green Belt constrained towns and villages, including; Upton, Wareham, Lytchett Matravers, and Lytchett Minster. The purpose of the reviews was to determine the contribution of assessed sites to the five purposes of including land within the Green Belt, as set by the National Planning Policy Framework (NPPF) and to establish the ‘exceptional circumstances’ required for the release of some sites to meet the District’s development needs.

3.18 The Council’s assessment of Sunnyside Farm and the assessed extent of Land at Blaneys Corner concluded that the sites would be suitable for removal from the Green Belt, including the following comments from the 2016 review:

Sunnyside Farm – *‘...As long as development did not extend the settlement any further east or north than at present, Lytchett Matravers would not extend towards the conurbation and development here would not harm the function of the greenbelt.’*

Blaneys Corner – *‘...The Council has already released land to the south of this site at Max Gate (Huntick Road) for a settlement extension. Further development could sit comfortably at this site without resulting in sprawl towards the conurbation.’*

3.19 In recognition of the Council’s process of Green Belt review, HDA has carried out an independent assessment of the sites’ Green Belt contribution, which includes the eastern fields of the Blaneys Corner site, not previously assessed by the Council’s review. The HDA Green Belt Boundary Review was previously submitted separately as part of this response to the Options Consultation Local Plan. The findings of HDA’s assessments are generally consistent with the Council’s June 2016 Review and can be summarised as follows:

Purpose 1: Checking unrestricted sprawl of large built-up areas

- The sites do not lie adjacent to a large built-up area and are situated in a location consistent with the existing settlement pattern. The sites are distant from the conurbation. Assessed contribution: Very low / none (Sunnyside Farm); and Low (Blaneys Corner).

Purpose 2: Preventing neighbouring towns merging into one another

- With the exception of a small section at the east of Blaneys Corner, development within the sites would not extend beyond the existing settlement edge of Lytchett Matravers and would not noticeably alter the spatial relationship between the village and any adjacent settlement. Assessed contribution: Very low / none (Sunnyside Farm); and Low (Blaneys Corner).

Purpose 3: Assist in safeguarding the countryside from encroachment

- The sites are well related to the existing (and already planned) development edge and are physically separated from the rural landscape beyond the settlement by robust tree belts and hedgerows. Assessed contribution: Low (Sunnyside Farm); and Medium (Blaneys Corner).

Purpose 4: Preserving the setting and special character of historic towns

- The sites have no relationship with the Lytchett Minster Conservation Area or with any listed buildings present within Lytchett Matravers. Assessed contribution: Very low / none (both sites).

3.20 HDA’s overall conclusions are that the sites’ contribution to the purposes of the Green Belt are generally low due to their positions within the context of the existing village; combined with the ability to mitigate potential impacts on the limited views from the wider landscape as part of future development. Moreover, HDA’s assessment demonstrates that the larger land area being promoted for the Blaneys Corner site is highly enclosed and is well related to the existing settlement. It is therefore as suitable to release from the Green Belt as the smaller area which is suitable for release by the Council’s latest Green Belt Review and the Pre-submission Local Plan.

3.21 The sites can be developed without harm to the aims and purposes of the Green Belt in a way which ensures the provision of a robust new Green Belt boundary.



View looking north from the high ground along the southern boundary of Blaneys Corner



View looking south-east towards Blaneys Corner from the junction between Wimborne Road and Wareham Road.



View looking south-east across Sunnyside Farm towards residential properties along Lime Kiln Road.



View looking north east from footpath SE 17/23.



Kiln Cottage, a Grade II listed building



Lytchett Matravers Methodist Church



Lytchett Matravers Old School House

Heritage

3.22 The historic settlement pattern of Lytchett Matravers (pre-1900s) was of a loose agglomeration of buildings connected by lanes and interspersed with fields. This is reflected in the scattered listed buildings found across the village and the lack of any Conservation Area designation. The village remained relatively unchanged for the early part of the 20th Century, although it underwent a significant increase in development after the war, which has resulted in the current large size and nucleated settlement pattern. The proximity of the village to Upton and Poole has maintained development pressure on the village which has been constrained largely due to the surrounding Green Belt designation.

3.23 There are two listed buildings within proximity to Sunnyside Farm: Tall Tree Cottage (Grade II) is about 60 metres to the south west and Kiln Cottage (Grade II) is located about 85 metres west of the site. Due to the presence of intervening development and the absence of intervisibility between the heritage assets and the site, neither of these buildings or their settings would be substantially or less than substantially harmed as defined by Section 16 of the NPPF.

Biodiversity

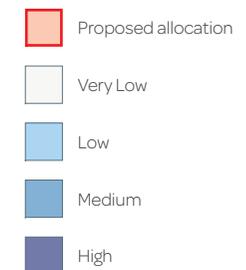
3.24 An Ecological Appraisal by HDA identifies the land at Flowers Drove and Sunnyside Farm as horse-grazed grassland paddocks, generally bordered by native hedgerows, with a block of semi-mature broadleaved plantation woodland along the northern margin. The land at Blaneys Corner also comprises grassland fields, generally bordered by species-poor native hedgerows, mature scrub and treelines with ditches.

3.25 With regard to protected and notable species, the ecology surveys carried out to date have identified that the land at Flowers Drove and Sunnyside Farm may have some potential for roosting, foraging and commuting bats. In addition there may be limited potential for Hazel Dormice and some potential for low numbers of Great Crested Newts (during terrestrial phases only). The potential for protected and notable species is similar for Blaneys Corner, albeit with some additional potential for water voles being present.

Flood Risk

3.26 The sites are located entirely within Flood Zone 1 with an assessed probability of flooding from rivers or the sea of less than 1 in 1,000 per year.

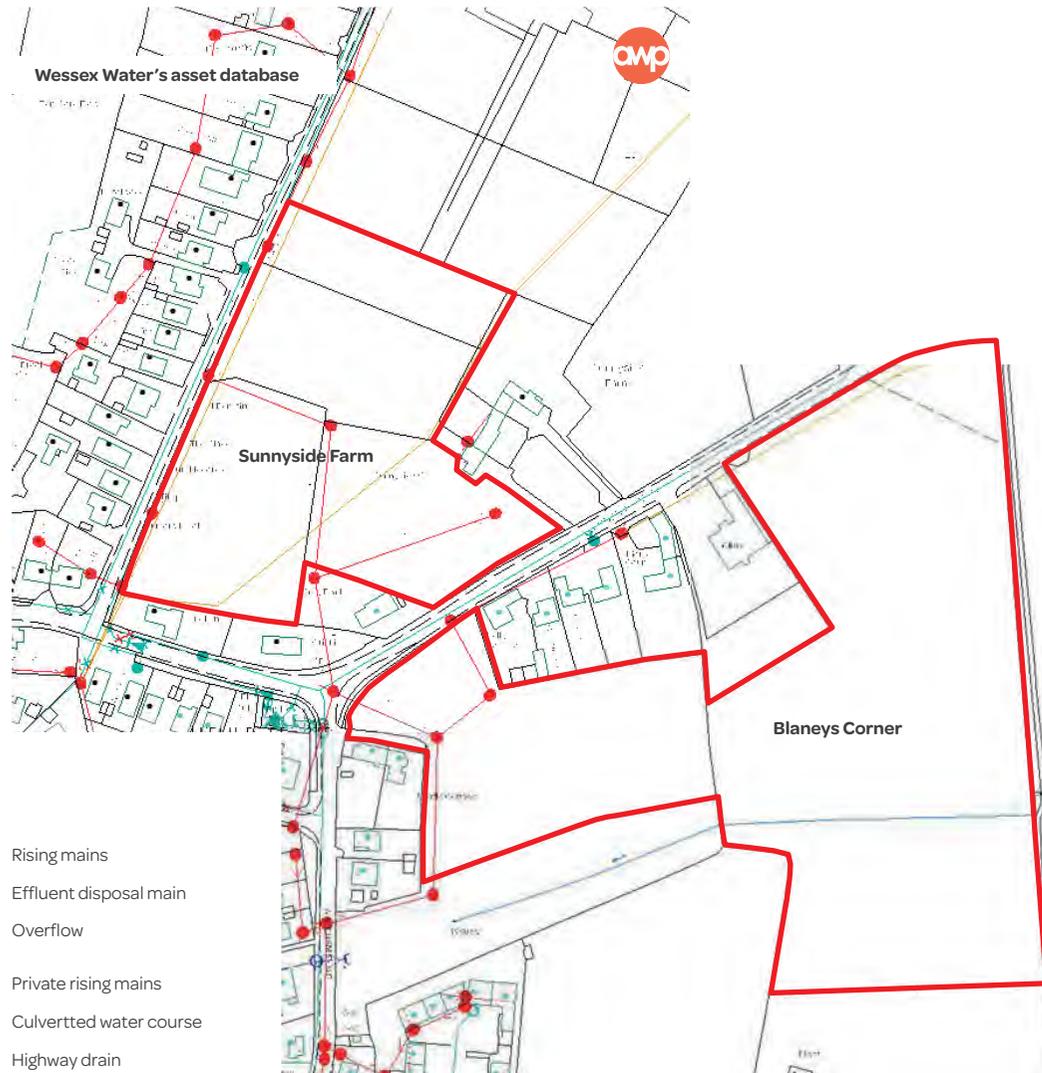
3.27 The Environment Agency's 'Flooding from Surface Water' mapping also indicates that the majority of the sites are within an area at very low risk of flooding from surface water (0.01% per year). The exceptions to this comprise a narrow corridor within the western site area of Sunnyside Farm and an area within the south of Blaneys Corner which follows the path of a small watercourse. These two areas show a low and medium risk of flooding (between 0.1 – 3.3% chance per year) and a higher risk of flooding (greater than 3.3% chance per year) respectively. Development will be avoided within these areas or, where this is not feasible, appropriate mitigation used to overcome the risks.



Site Drainage

3.28 A desktop review of the Soilscape Dataset, carried out by Awcock Ward Partnership (AWP), indicates the sites are underlain by 'slightly acid loamy and clayey soils with impeded drainage'. Soakaways are therefore unlikely to present a viable method of surface water disposal. On-site attenuation, combined with controlled off-site discharge, is considered to be the most appropriate drainage solution.

3.29 Wessex Water asset record data has identified a number of 150mm diameter foul sewers and rising mains at the boundaries of Sunnyside Farm and also running through the site. There is similarly an existing 150mm diameter foul sewer within the west of Blaneys Corner and an existing foul rising main adjacent to the north-eastern boundary at Wimborne Road. There is also an existing minor watercourse, which flows eastwards between the two eastern fields of the Blaneys Corner site.





Example of a Wyatt Homes development



Aerial view: Illustrative perspective sketch looking south-east towards Blaneys Corner from the junction between Wimborne Road and Wareham Road

The Proposal

Wyatt Homes' proposed concept for Sunnyside Farm and Land at Blaneys Corner positively responds to the qualities of these sites and their setting, to ensure that future development will sensitively integrate with the existing village and the wider rural landscape context.

4.1 The quality of the surroundings at Lytchett Matravers demand the right balance between landscape and built form. This is critical to delivering the right place that will be a successful and positive addition to the village.

4.2 An analysis of the sites' constraints and opportunities, as summarised in the previous section of this document, has been undertaken. From this understanding, a framework masterplan has been prepared. A number of themes have been identified that have in particular helped to shape the masterplan:

- Levels and Views
- Landscape Structure and Biodiversity
- Utilities and Drainage
- Access and Movement

Levels and Views

Key Observations

- 4.3** The sites exhibit a gently undulating character, with slopes present on both sites.
- 4.4** The external site boundaries comprise a mix of hedgerows, ranging from 1.5 to 5 metres in height with mature tree specimens throughout. Sunnyside Farm includes a planted woodland copse extending approximately 25 metres into the site which is a visually robust landscape feature and end point of the site. The weakest defined boundaries currently comprise the southern boundary in the eastern half of Blaneys Corner and the eastern and north-eastern boundary lengths adjoining Sunnyside Cottages.
- 4.5** Sunnyside Farm and Blaneys Corner are well contained - views into the sites are mostly limited to the existing residential properties in their immediate proximity.
- 4.6** Long distance views out of the sites are equally limited by the presence of existing boundary landscape and topographical features.

Response

- 4.7** The existing woodland copse at Sunnyside Farm should be retained as a landscape feature edge to the development, providing strong visual containment of the site.
- 4.8** The location and form of new development should be sensitive to the site levels, making use of the opportunities to deliver a distinctive and varied place.
- 4.9** The weakest defined site boundaries should be reinforced and strengthened to complete the visual containment of the sites.

Site analysis plan : Sunnyside Farm



Site analysis plan : Blaneys Corner

KEY

-  Site boundary
-  Public right of way
-  Potential footpath / cycleway
-  Developed edge
-  Existing landscape buffer
-  Potential landscape buffer
-  Intervisibility with the site



Landscape Structure and Biodiversity

Key Observations

4.10 The site boundaries fronting Flowers Drove and Wimborne Road (where not already punctuated by existing driveways serving private properties on Wimborne Road) are characterised by out-growing boundary hedgerows.

4.11 The internal field boundaries in Blaneys Corner include good quality areas of treed hedgerows with landscape and biodiversity value.

4.12 The northern woodland belt in Sunnyside Farm should be retained as it represents a strong feature in the existing landscape structure.

4.13 There are a number of high and moderate quality (Grade A and B) tree specimens along sections of the site boundaries of Blaneys Corner.

Response

4.14 Where required, reinforcement of the sites boundaries, i.e. south eastern corner of Blaneys Corner, should be implemented. Across both sites, properties should be sufficiently set back from the site edges to ensure long term retention of the landscape boundary definition.

4.15 The northern copse of woodland in Sunnyside Farm should be retained to ensure continuity of the existing landscape character.

4.16 An area of landscaped open space could be created in the north western edge of Blaneys Corner creating a new managed feature to announce the arrival point to the village and to better integrate the site.

4.17 Habitats which have biodiversity value and the higher quality trees throughout the sites should be retained.

4.18 There is scope to provide a link between Blaneys Corner and the already allocated Huntick Road development site, without resulting in detriment to the existing landscape structure or habitats of biodiversity value.



View looking north from the southern end of Flowers Drove.



View looking south-east from the junction between Wimborne Road & Wareham Road

Habitat survey plan



KEY	
[Red outline]	Site boundary
[Green diagonal lines]	Broadleaved plantation woodland
[Green circles]	Scattered trees
[Green dashed line]	Defunct species-rich hedgerow
[Green solid line]	Intact species-poor hedgerow
[Green dashed line with dots]	Defunct species-poor hedgerow
[Green dashed line with squares]	Defunct species-poor hedgerow with trees
[Green cross-hatch]	Dense native scrub
[Black cross-hatch]	Scattered scrub
[Red solid area]	Dense Bracken
[Orange diagonal lines]	Tall ruderals
[SI in a box]	Species-poor semi-improved grassland
[Orange diagonal lines]	Marshy grassland/ rush pasture
[Black dashed line]	Fence
[Blue arrow]	Wet ditch and direction of flow
[Blue dashed line]	Dry ditch
[Red circle with number]	Target note

Utilities and Drainage

Key observations

4.19 Existing public foul sewers and rising mains pass through Sunnyside Farm, requiring easement corridors ranging from 6 to 12 metres either side of the pipe centre lines.

4.20 Soil conditions across both sites are likely to preclude the use of soakaways for surface water disposal. On site attenuation with controlled off-site discharge(s) will be required.

4.21 An overhead electricity transmission cable follows the eastern boundary of Blaneys Corner and is located within the site. A further overhead electricity transmission cable is present adjacent to but beyond the southern boundary of Blaneys Corner.

Response

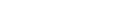
4.22 Rising mains within Sunnyside Farm should be left in their current locations with appropriate easements being designed into the development.

4.23 The existing foul sewers within Sunnyside Farm should be diverted as required, rather than designed into the development.

4.24 On-site storage attenuation ponds should be incorporated within the design of the development, siting the ponds in the best locations to maximise the use of gravity flows.

4.25 The overhead electricity transmission cables may need to be diverted or run underground to accommodate development.

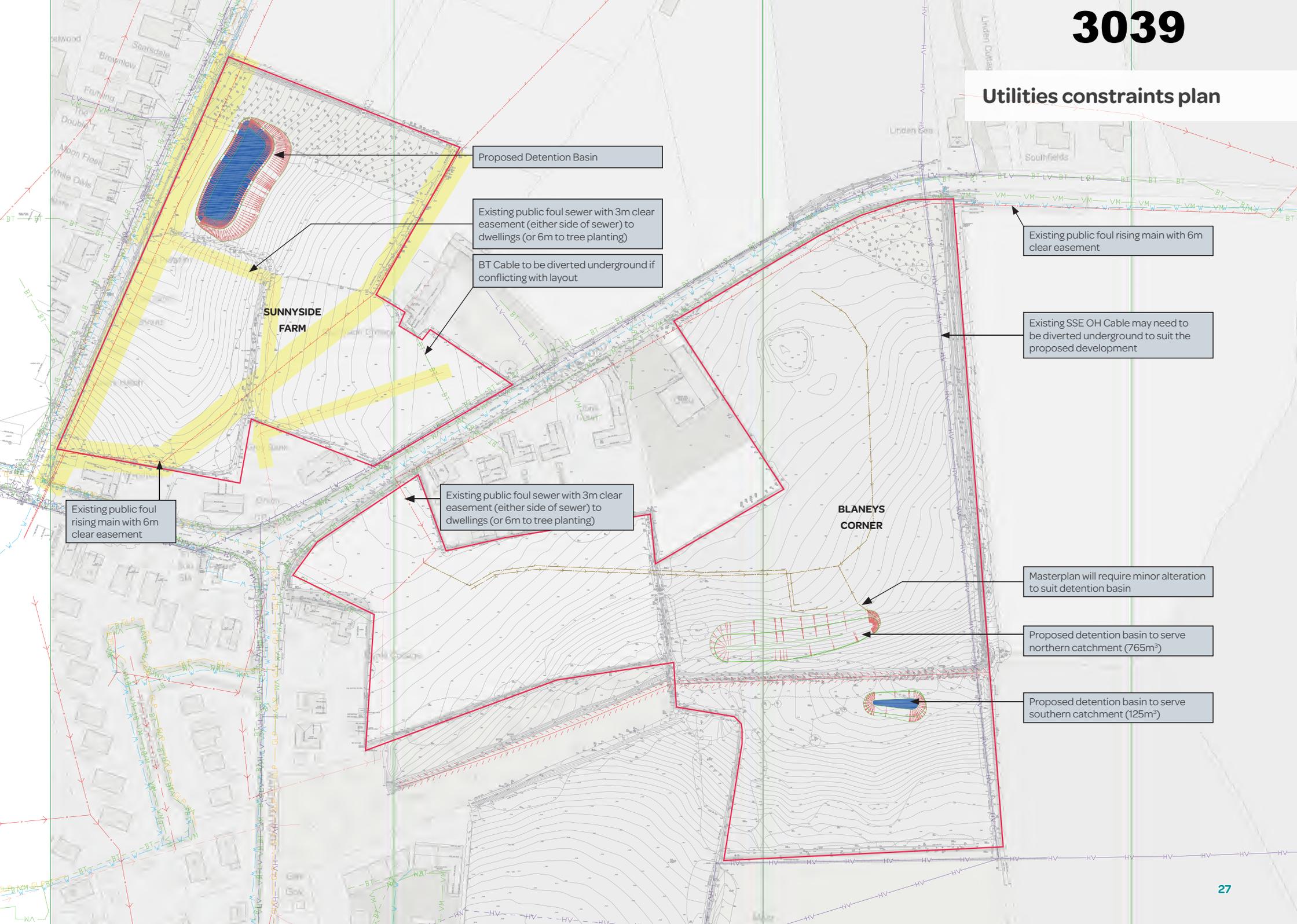
Key

	Site Boundaries
	Developable Area
<u>Existing Utilities</u>	
	WW Distribution Main
	SSE HV OH Cable
	SSE HV UG Cable
	SSE LV UG Cable
	SSE LV OH Cable
	SSE OH EHV Cable
	BT UG Cable
	BT OH Cable
	Virgin Media UG Cable
	SGN Low Pressure Main
	SGN High Pressure Main
<u>Existing Drainage</u>	
	Adopted Foul water sewer
	Adopted Surface water sewer
	Adopted Foul Rising Main
	Ditch
	Easement either side of Foul Sewer



View looking north from footpath SE 17/23 showing the overhead power cable following the eastern boundary of Blaneys Corner

Utilities constraints plan



Proposed Detention Basin

Existing public foul sewer with 3m clear easement (either side of sewer) to dwellings (or 6m to tree planting)

BT Cable to be diverted underground if conflicting with layout

Existing public foul rising main with 6m clear easement

Existing SSE OH Cable may need to be diverted underground to suit the proposed development

Existing public foul rising main with 6m clear easement

Existing public foul sewer with 3m clear easement (either side of sewer) to dwellings (or 6m to tree planting)

BLANEYS CORNER

Masterplan will require minor alteration to suit detention basin

Proposed detention basin to serve northern catchment (765m²)

Proposed detention basin to serve southern catchment (125m²)

Access and Movement

Key observations

4.26 Blaneys Corner has two areas of frontage onto Wimborne Road. The largest section is situated to the east of the former British Legion building, within what is currently a 40 mph speed limit zone. The smaller section of frontage, on the north western corner of the site, is within the 30 mph speed limit zone. The opportunity to introduce a vehicular access in this location is limited.

4.27 Sunnyside Farm has two highway boundary frontages. To the west, the site boundary follows Flowers Drove, which is a narrow rural lane. The short frontage to the south east is onto Wimborne Road, opposite existing residential properties.

4.28 The sites are not currently publically accessible. There are however existing public rights of way in close proximity to the sites.

4.29 Blaneys Corner adjoins the existing settlement extension allocated site on Huntick Road (Policy NE1 of the adopted Local Plan). This provides a further opportunity to integrate the site with the existing and planned village.

Response

4.30 Simple priority junctions should be provided for vehicular accesses into each of the sites at appropriate locations along Wimborne Road. It is anticipated that the required visibility splays could be achieved without need for any offsite works.

4.31 The existing 30 mph zone should be extended to include the full site frontage of Blaneys Corner. This will enable creation of a safe vehicular access at the north eastern site frontage and improve pedestrian safety for users when crossing the road to connect between the public rights of way (SE 17/23 to SE 17/3) adjacent to the site.

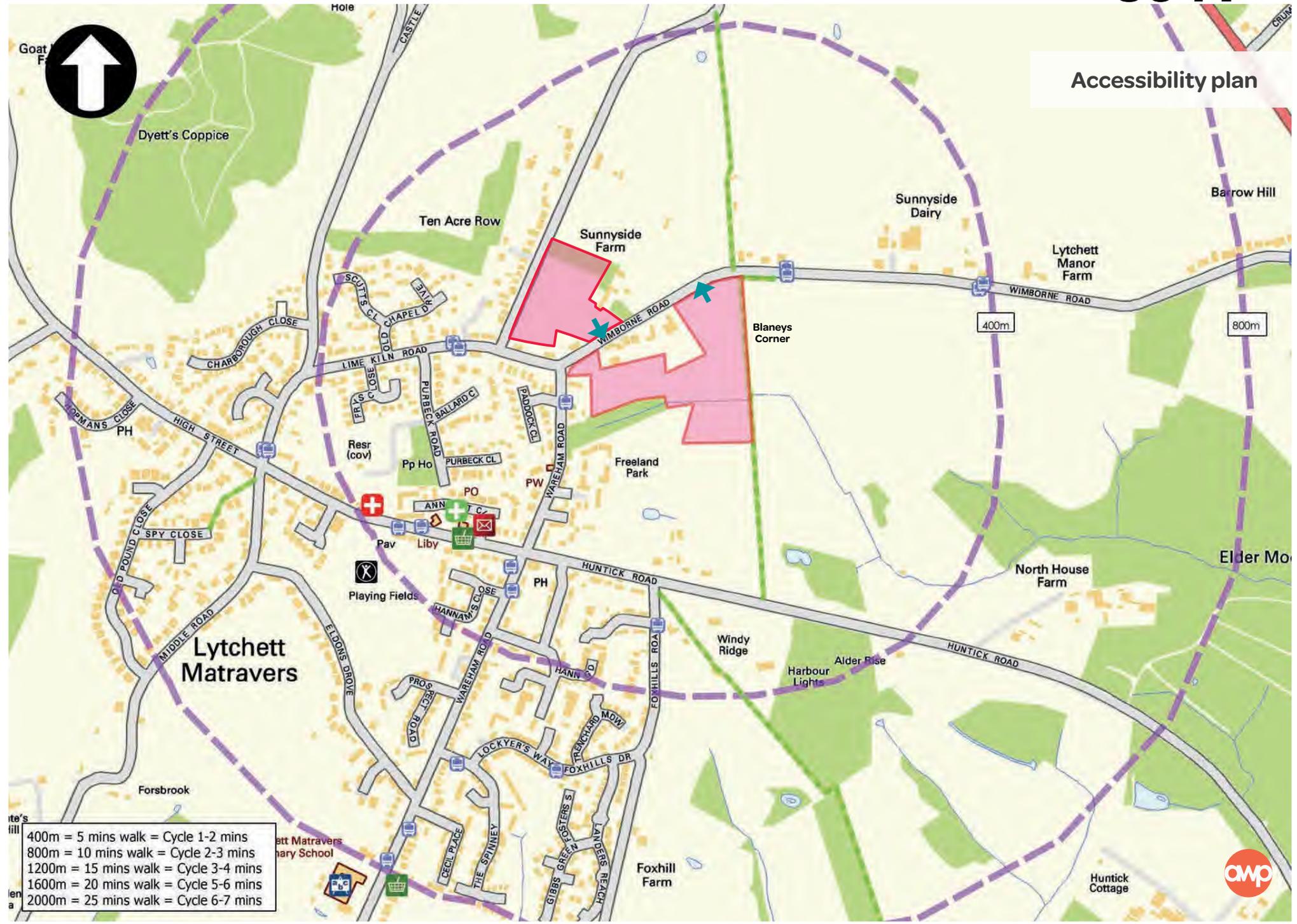
4.32 Improvements to the existing pedestrian footway on Wimborne Road should be sought to further increase safety and to promote sustainable access to the village.

4.33 The creation of a link between Wimborne Road and the allocated Huntick Road site should be considered to enhance the permeability of the development and the wider movement options through the village.

Key

	Site Location
	Main Vehicle/ Pedestrian Access
	Public Right of Way
	Bus Stop
	Primary School
	Post office
	Convenience Store
	GP Surgery
	Pharmacy
	Playing Field

Accessibility plan



400m	= 5 mins walk	= Cycle 1-2 mins
800m	= 10 mins walk	= Cycle 2-3 mins
1200m	= 15 mins walk	= Cycle 3-4 mins
1600m	= 20 mins walk	= Cycle 5-6 mins
2000m	= 25 mins walk	= Cycle 6-7 mins



The Concept

4.34 Having identified the sites' key features and characteristics, these have been applied to develop a framework masterplan for the sites.

4.35 For each of the sites, the framework masterplan responds to the constraints and key opportunities to create an attractive and sustainable development that responds positively to its surroundings and the wider context. The site masterplans will deliver around 90 new homes in total, in addition to new public green open space within each site.

Sunnyside Farm

Land Use	Area (ha)	%of site area
Approximate new residential developable area	0.88	47
Approximate open space area	0.61	33
Roads and footpaths	0.37	20
Total site area	1.86	

Blaneys Corner

Land Use	Area (ha)	%of site area
Approximate new residential developable area	2.19	57
Approximate open space area	1.16	31
Roads and footpaths	0.45	12
Total site area	3.82	

Land at Blaneys Corner presents the opportunity to deliver around 60 new homes

- 1 New access connection created to Wimborne Road
- 2 Homes set back to front a strengthened hedgerow edge to Wimborne Road
- 3 Opportunity to establish new footpath connection directly opposite existing public routes
- 4 New tree and hedgerow planting to redefine the Green Belt boundary and screen inward views
- 5 Central public green space incorporating the existing watercourse and providing space to support sustainable drainage requirements
- 6 New bridge crossing to connect over the existing watercourse
- 7 Feature dwellings with south facing gardens overlooking the central green space
- 8 Potential access connection to the existing Local Plan allocation site off Huntick Road
- 9 Focal green providing amenity space for new and existing residents
- 10 'Corner green' creating welcoming village arrival space and inviting pedestrian connections to and from the village

Land at Sunnyside Farm presents the opportunity to deliver around 30 new homes

- 11 New access connection created to Wimborne Road
- 12 Hedgerows retained to maintain the 'green approach character' to the village along Wimborne Road
- 13 Existing woodland area retained with potential to create public access and footpath connections
- 14 Public green space also supporting sustainable drainage requirement
- 15 Opportunity to create a safer footpath connection within the site
- 16 New homes set back to front the retained hedgerow along Flowers Drove
- 17 Existing boundary planting retained and strengthened where possible

Concept Masterplan

Sunnyside Farm

Blaneys Corner



Character

4.36 For Sunnyside Farm a new vehicular access with pedestrian footpaths on both sides will be created onto Wimborne Road with new tree and hedgerow planting creating a 'green and leafy' character. The street will gently slope down to access shared surface lanes where a range of cottage style properties will front an informal green.

4.37 By providing 'back-to-back' arrangements between new and existing dwellings, the proposals ensure that the exposed site edges are made secure to establish a safer residential environment. In certain locations reducing the scale of dwellings or creating a 'side (flank) to back' arrangement will also help to provide an appropriate setting to the site edges. Properties fronting onto Flowers Drove will remain set back from the site boundary behind the retained hedgerow and a new access road.

4.38 Where possible new boundary planting can be provided to help strengthen the 'green edge' character. The woodland copse along the northern boundary will be retained to enclose the development and provide opportunities for informal play and woodland walks. A new footpath through the west of the site can be provided to improve pedestrian safety on Flowers Drove and encourage public access to the wooded area at the north of the site.

4.39 For Blaneys Corner the 'green character' and arrival transition into the village along Wimborne Road

will be maintained by the retention of hedgerows and strengthened boundary planting. New homes will be set back to overlook the route and mark a new access created to Wimborne Road.

4.40 A feature village green will be created at Blaneys Corner to mark a point of arrival within the village. The space will be overlooked by new homes and provide a safe area for play and an inviting pedestrian and cycle connection to and from the village.

4.41 A new street links through the development providing an opportunity to connect with Huntick Road. This will further help integrate the new neighbourhoods with the village. This new route will present a traditional street character, with angled turns, bridge crossing and level changes bringing interest and opening up views.

4.42 A sequence of attractive spaces will naturally blend the development within the landscape and support informal recreation, sustainable drainage strategies and provide a sensitive setting to existing dwellings adjoining the development.



Western part of Blaneys Corner showing proposed residential development and the new 'Corner Green' at the junction between Wareham Road and Wimborne Road

Landscape

4.43 Existing trees are to be retained where feasible and planting of new trees will take place across the sites. This will reinforce the sense of village character and deliver a positive response, furthering integration to the wider landscape setting.

4.44 The sites' weaker boundaries will be reinforced with robust landscape screening to enhance the integration of the development into the wider setting by working with the landscape wherein fields are defined by a mix of mature hedgerows and treed hedgerows.

4.45 Sustainable drainage (SuDS) features, such as attenuation ponds will be integrated into the developments utilising the natural contours and locations of existing features within each site, such as the narrow valley corridor in Sunnyside Farm and the low point within the Blaneys Corner site.



Northern part of Sunnyside Farm showing proposed residential development alongside a new area of public green space

Site Access and Movement

4.46 Access into the sites will be sought from Wimborne Road.

4.47 New pedestrian access into the sites will connect with the existing footways on Wimborne Road, with improvements being provided where required. This will provide effective linking to the village centre to the south east which is within 400 metres (five minutes' walking distance of the sites).

4.48 The ability to incorporate 'home zone' features will be explored. This could include prioritising low vehicle movement speeds through the use of materials and adopted lower speed limit(s) within the development.



Proposed site access into Sunnyside Farm



Proposed site access into Blaneys Corner

Drainage and Utilities

Surface Water Drainage Strategy

4.49 To calculate the attenuation storage requirements it has been assumed that 60% of the developable site area will be impermeable catchment. This approach is common practice until a detailed site layout is available.

4.50 Attenuation ponds with volume capacities of 500 cubic metres (Sunnyside Farm) and 890 cubic metres (Blaneys Corner) are provided within the framework masterplans. These are situated near to the lowest points of each site. The attenuation ponds could also be sub-divided into a series of smaller features if necessary.

4.51 Peak rates of discharge will be managed by a series of hydraulic controls with restricted outflow being discharged to the nearest appropriate point, which will be agreed as part of a detailed site layout.

Foul Water Drainage

4.52 Foul water flows on Sunnyside Farm will be capable of discharge to the existing 150mm diameter foul network within the site. Wessex Water has confirmed adequate capacity exists to accommodate the additional flows from the development.

4.53 Wherever possible, foul water flows from Blaneys Corner will discharge to the existing gravity sewers within the site. Any residual discharge not capable of utilising gravity flows will need to be controlled by a new sewage pumping station. This will require an approximate compound area of 12 by 8 metres located at least 15 metres from any habitable buildings. Wessex Water have confirmed that further assessment will be required to determine any reinforcement works that may be needed to accommodate the additional flows generated by the proposed level of development. Discussions with Wessex Water are ongoing to determine actual capacity and any mitigation requirements. This information will be shared with the Council in due course.

Utilities

4.54 A recent utilities search (May 2017) has established that Wimborne Road, Lime Kiln Road and Flowers Drove contain multiple services, including underground low pressure gas mains, virgin media telecoms, South West Water supply mains, BT telecoms and overhead low voltage SSE electricity transmission cable.

4.55 It is expected that the overhead BT cable at the east of Sunnyside Farm will be diverted below ground as part of the development. The overhead electricity transmission cables within and to the south of Blaneys Corner should be capable of being retained in-situ, given that they are unlikely to impact on future development. The option to divert these cables below ground nonetheless remains.

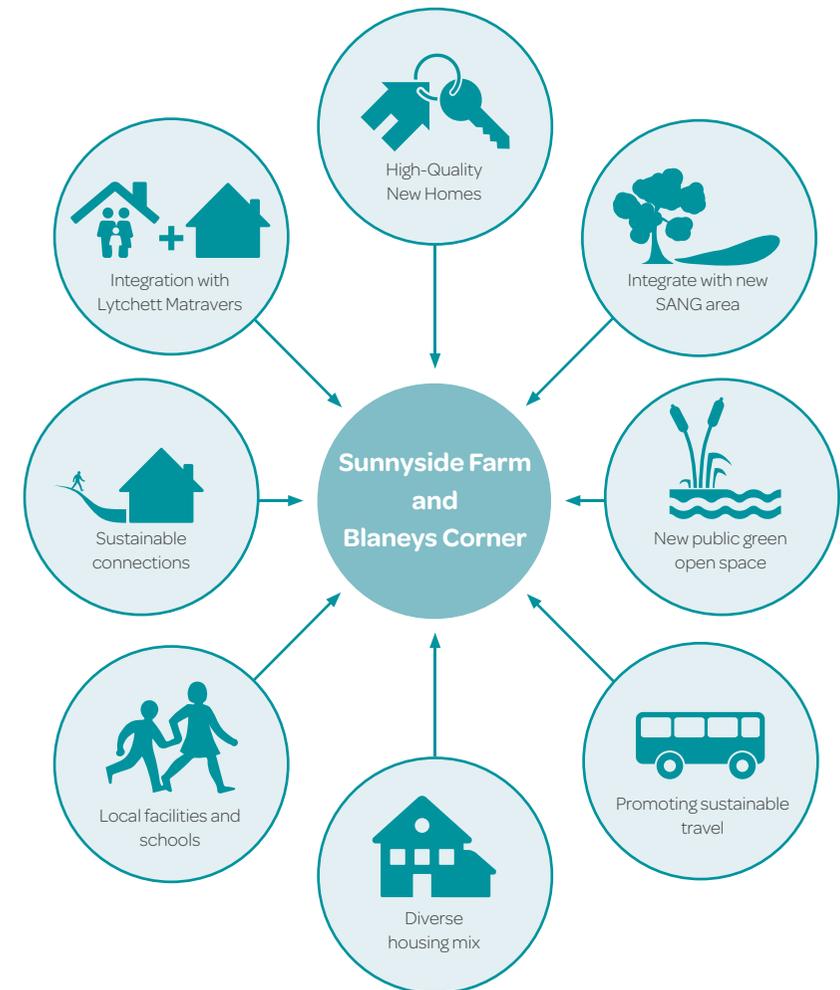


Example of a SuDS feature incorporated into a new residential development

Sustainable Development

4.56 The following features of the development proposed for each of the sites will ensure that sustainable development is achieved:

- The sites are accessible to a range of local facilities within the village centre that are within comfortable walking distance, including convenience retail and health services.
- The site is accessible to existing public transport links to Poole town centre, which provides wider education, retail, employment and health facilities. Development will also increase potential patronage of the local bus services, helping to underpin and secure their long term viability.
- An effective drainage strategy capable of avoiding or mitigating flood risk and emphasising attractive sustainable drainage (SuDs) measures integrating with the new development and the wider landscape character.
- Opportunity to create a new attractive area of Suitable Alternative Natural Greenspace (SANG) within easy walking distance of the sites.
- Emphasis on high quality design, balancing traditional techniques with latest innovation to achieve attractive homes and spaces that will endure and bring delight for decades to come.
- Ensuring that new homes and spaces are resource efficient and embody a 'fabric first' approach and can respond to the threat of climate change by minimising energy, carbon and water use.
- Providing a wide range of housing types, sizes and tenures to help meet the local need for new homes in a sustainable location.
- Allowing for sustainable waste management during construction and operation.
- Promotion of walking and cycling through enhanced access.
- Significant direct and indirect economic benefits to the village.
- Increase in Council Tax and New Homes Bonus revenue supporting local services.



Biodiversity and Nitrogen Neutrality

4.57 The framework masterplans seek to maintain, and where feasible enhance, opportunities for wildlife and existing habitat connectivity. This will be achieved by avoiding, wherever possible, direct or potential indirect loss of the existing ecological on-site habitats, for example, at the minor watercourse traversing Blaneys Corner. The same approach is afforded to species of note that may inhabit the sites, which may include bats and Hazel Dormice, through the retention and reinforcement of boundary hedges and additional landscaping to enhance migratory route connectivity.

4.58 Development of the sites will also enable the delivery of an ecological enhancement and management programme, ensuring a long term positive ecological impact is achieved for both flora and fauna.

4.59 The development of these sites will accord with the guidance outlined within the adopted Nitrogen Reduction in the Poole Harbour Supplementary Planning Document (April, 2017).



SANG Mitigation

4.60 Development on these sites will require delivery of appropriate Suitable Alternative Natural Greenspace (SANG) to mitigate the otherwise adverse impact(s) that may result on the Dorset Heathlands and Poole Harbour Special Protection Areas (SPAs). Discussions with Natural England regarding appropriate opportunities for SANG mitigation are ongoing. From these discussions, it has been agreed, in principle, that a new SANG area should be provided, located in close proximity the north east of the sites on land fully within the control of Wyatt Homes.

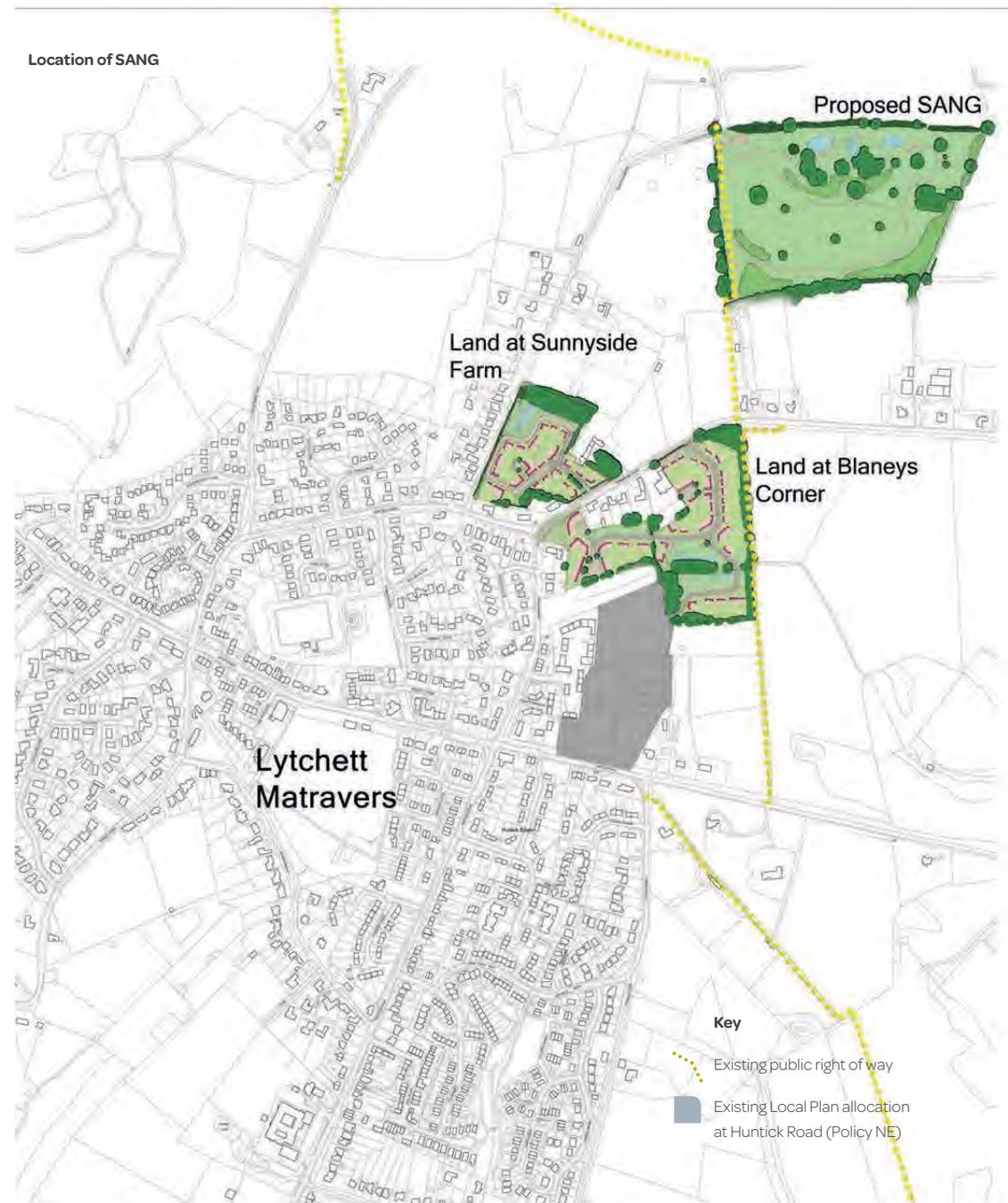
Wyatt Homes Proposed New SANG

4.61 Wyatt Homes are proposing to create a new SANG to the north of Lytchett Matravers on land to the east of Flowers Drive.

4.62 The proposed new SANG comprises an area of approximately 7.3 hectares of currently undeveloped agricultural land. The creation of the SANG will result in improvements to the biodiversity and visual landscape character of the land. This will include retention and improvement of the existing ponds, retention and management of the existing trees and hedgerows alongside reinforcement and proposed new native scrub, hedge and tree planting.

4.63 The SANG will provide a circular walking route designed to deliver links to the wider existing public rights of way around the village. The walking route within the SANG will predominantly be unsurfaced to maintain an appropriate semi-natural feel. It is also proposed to create a small car park capable of accommodating approximately 7 vehicles at any one time.

4.64 The SANG is located within approximately 200 metres to the north of both sites and will provide an appropriate means of mitigating the potential impacts upon the SPAs, which themselves are located approximately 3 km (Dorset Heathlands) and 2.5 km (Poole Harbour) from the sites (straight line distances).





- Proposed access
- Proposed car park
- New wildlife pond
- Existing pond
- Retain existing hedgerow and enhance with new native planting
- Retain and manage existing trees
- Flower's Drove SANG
- Proposed tree planting
- New native scrub planting
- Retain meadow and manage to improve species diversity
- Retain existing hedgerow and enhance with new native planting
- Opportunity to create a safe pedestrian route along roadside Corner site

Sunnyside Farm

Blanneys Corner





Aerial view: Illustrative perspective sketch

Conclusions

Summary

5.1 The proposals for Sunnyside Farm and Blaneys Corner have been developed on a more detailed understanding of the sites than that available to the Council at the earlier stages of preparation of the local plan. The site specific work carried out to date by Wyatt Homes has established that the sites have a combined capacity to deliver approximately 90 new homes through the creation of two high quality and well-linked new places befitting the village's identity and the qualities of the wider landscape context.

5.2 This sites will deliver the sustainable development of much needed new homes in the District, in full compliance with the policies of the NPPF. The sites represent appropriate infill opportunities, capable of rounding-off the village and making a positive contribution to the village's character, but without detriment to the wider landscape setting.

The Way Forward

5.3 Moving forward, the sites technical attributes will continue to be assessed by Wyatt Homes and the development proposals for the sites will continue to be refined. All technical work and survey findings will be shared with key stakeholders, including the District Council and the Parish Council. Input will also be drawn from local residents in the form of public engagement, the feedback from which will further inform the development proposal.

5.4 Wyatt Homes are proud to be working on the delivery of much needed new homes at Lytchett Matravers and would like to fully engage with all relevant stakeholders as they progress their development proposals. As a local developer Wyatt Homes seeks to consolidate its reputation and will deliver high quality developments at these sites to enhance the character of the village, creating a strong identity and sense of place.

Appendix 1

Supporting Documents

Supporting Document	Prepared by
Ecological Appraisal	Hankinson Duckett Associates
Landscape and Green Belt Report	Hankinson Duckett Associates
Highway, Flood Risk and Drainage Technical Note	AWP
Tree Survey	Barrell Treecare



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For further information contact

Peter Home



Comment

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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wyatt Homes (- 1190024)
Comment ID	PLPP484
Response Date	03/12/18 17:23
Consultation Point	Policy H6: Lytchett Matravers (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H6: Lytchett Matravers
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Criteria a) of Policy H6

Criteria a). makes reference to improving: “*accessibility between Lytchett Matravers and Lytchett Minster by forming or improving defined walking and cycling routes between the villages.*” Whilst our client has no concern with the requirements of this in principle, it is important to stress that the objective of this criterion would be considerably easier to achieve and more effective in outcome were the Blaneys Corner allocation site to be extended as requested above. This extension would make it possible to deliver a safe and convenient pedestrian and cycle route from the north of the village, via the Blaneys Corner and Huntick Road sites to connect with Huntick Road and Foxhills Road.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Extend the proposed site allocation of Blaneys Corner to allow for a pedestrian / cycle route to be provided from that site to the Huntick Road existing allocation site to the south.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Wyatt Homes has a range of interests across the north east of the district, a number of which are being proposed for allocation by the Pre-Submission Purbeck Local Plan. Whilst our client is generally supportive of the Local Plan, there are a number of areas where there is concern that the Local Plan, as drafted, is not yet 'sound' but can be made so through a range of plan modification that we have proposed. Our client considers it important to attend the hearing sessions to assist the Council in exploring the areas where the plan is not yet sound and reaching a position whereby it may become so.

Comment

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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wyatt Homes (- 1190024)
Comment ID	PLPP487
Response Date	03/12/18 17:24
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H9: Housing mix
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The approach to delivering Self-build plots

Whilst our client supports the encouragement of self-build and custom housebuilding through the Local Plan as an overall objective, the requirement to provide 5% of market homes as self-build plots on sites over 20 units is inflexible and likely to diminish the development viability of the Local Plan's key strategic site allocations. It is also doubtful whether such a requirement is consistent with national planning policy and guidance.

Overall, Wyatt Homes considers that the objective of boosting the provision of self-build plots would be best served by seeking alternative approaches to their delivery, such as engaging with landowners to bring appropriate sites forward specifically to meet the needs of those on the self-build register. This aligns with national planning guidance, for example, paragraph 57-025 of Planning Practice Guidance (PPG), which outlines that the Council should engage with landowners and encourage them to consider self-build and custom housebuilding on their land.

In addition, paragraph 57-14 of the PPG states that under section 2(1) of the Self-build and Custom Housebuilding Act 2015 relevant bodies (such as district councils) have a duty to have regard to each self-build and custom housebuilding register that relates to their area when carrying out their planning, housing land disposal and regeneration functions. The PPG then goes on to set out a variety of approaches in which the duty may be demonstrated in carrying out each function. One of these approaches is for district councils to consider how they can support the delivery of self-build custom housebuilding plots through their housing strategy, land disposal and regeneration functions. We have not seen any evidence that the Council has examined these options as part of their evidence base but is instead seeking to require landowners and the housing industry to bring forward plots. As such we consider this element of Policy H9 to be ***inconsistent with national planning guidance***.

The impact of self-build and single storey home requirements on development viability

Our client also raises concern in relation to the detrimental impact that the self-build plot and single storey home requirements within Policy H9 may have on overall site viability. The concern is heightened particularly when this aspect is considered in combination with the other requirements within the Local Plan, including those relating to financial contributions towards improvements to school and healthcare provision as well as the additional requirements for community facilities as outlined under Policy I7.

On review of the Viability Study Update (2018) we consider that there is limited evidence to support the assumption made that self-build plots will have a 'neutral impact' in viability terms. No self-build plots appear to have been built into the viability appraisal and instead, homes included are those proposed for market sale which does not reflect the specific financial implications of developer's delivery of self-build plots.

Similarly, the costs associated with the development of single storey homes do not appear to have been built into the viability appraisal. Bungalows are regarded as a separate product from standard two storey housing, driving a different profile of values and construction costs which should be assessed and evidenced separately.

In relation to the specific targets set, we also consider that there is limited evidence to justify why the council considers that 5% of all units offered for sale is an appropriate requirement for the provision of self-build plots and why 10% of all units is considered an appropriate requirement for single storey homes. Paragraphs 116-117 of the Housing Background Paper refer to the need for these forms of housing provision but shed little light on the reasons why the specific targets set out in Policy H9 were set.

As such and in the absence of clear evidence to support the policy targets for self-build plots and single storey homes, we consider that the policy targets are ***not justified*** in relation to the 'tests of soundness'.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make

the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

In order to address the identified deficiencies, the Council should clarify how its approach to encouraging the delivery of self-build plots is consistent with national planning guidance, including how it is using the opportunities such as the Council's housing strategy, land disposal and regeneration functions to bring forward plots for self-builders.

In addition, if the Council is to continue with the approach of setting specific policy targets, the implications of these on the viability of the development schemes they will impact on must be appropriately considered through supplementary work on the Council's Viability Study.

In the absence of clear quantifiable evidence of need and of the viability impact of the proposed targets, they should only be taken forward if the policy wording is amended to provide greater flexibility to developers. For example:

"For sites delivering 20 or more units, development proposals will be encouraged to provide, as part of the proposed market homes:..."

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Wyatt Homes has a range of interests across the north east of the district, a number of which are being proposed for allocation by the Pre-Submission Purbeck Local Plan. Whilst our client is generally supportive of the Local Plan, there are a number of areas where there is concern that the Local Plan, as drafted, is not yet 'sound' but can be made so through a range of plan modification that we have proposed. Our client considers it important to attend the hearing sessions to assist the Council in exploring the areas where the plan is not yet sound and reaching a position whereby it may become so.

Comment

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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wyatt Homes (- 1190024)
Comment ID	PLPP490
Response Date	03/12/18 17:27
Consultation Point	Affordable housing need (View)
Status	Processed
Submission Type	Web
Version	0.1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Paragraphs 161 - 165 (Viability evidence)

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Overall Comments in relation viability evidence regarding Lytchett Matravers sites

It provides a technical review and commentary in respect of the Purbeck District Council ('PDC') Updated Viability Study ('UVS') to Support PDC's Pre-submission Draft Local Plan ('DLP') and Revised Community Infrastructure Levy ('CIL'), as prepared by Dixon Searle Partnership ('DSP') and published in October 2018.

The UVS was published as part of PDC's Pre-submission Draft Local Plan Regulation 19 public consultation.

The UVS, along with previous work undertaken by DSP are stated within the UVS to provide *"the viability evidence to support the emerging Development Plan of the Council"*.

In particular, the aim of the UVS is stated to be to *"inform and support the local plan review and further inform the review of the Community Infrastructure Levy; and site specific assessments for key sites."*

"High level viability testing" of draft site allocations has been carried out *"to provide the Council with information on the potential deliverability of residential development at those sites (in a viability sense) and the potential level of affordable housing and other s106 that could be secured in each location."*

If the Local Plan is to be sound and deliverable, it is essential that the underpinning viability testing of its draft policies is conducted in a collaborative, comprehensive, evidenced and transparent basis, which accords with the Government's national policies and guidance.

The following issues have been identified within the methodology applied in the viability appraisals testing draft site allocations, which will be further detailed within the Technical Matters section of this representation:

- 1 Evidence should be provided to support the values and construction costs used for the testing of Sheltered housing.
- 2 Ground rent investment income is included within the draft site allocation appraisals despite the Government's proposal to restrict ground rents to peppercorn levels. The current assumption will produce an excessive level of financial viability within the published evidence.
- 3 Flat construction costs are included within the draft site allocation viability appraisals at a rate which is £168 per square metre (psm) lower than the RICS BCIS evidence data to which the evidence base refers. The current assumption will overstate the financial viability of development sites tested.
- 4 10% of units are stated to be bungalows, in line with DLP Policy H9, however, no bungalows are included in the draft Allocated Site Summary Appraisals attached at UVS Appendix IIc. Bungalows are regarded as a separate product from standard two storey housing, driving a different profile of values and construction costs which must be assessed and evidenced separately.
- 5 No scheme typologies are set out for the draft strategic site allocations. This is regarded as inappropriate and opaque as it prevents stakeholders from analysing whether the scheme mix and measurements are reflective of the expectations within the DLP.
- 6 The UVS states that unit sizing relates to 'the nationally described space standard'. However, the Council's DLP states that 'The Council also considers that application of the Nationally Described Space Standards would be too prescriptive for a District with such varied townscapes as Purbeck'. It would, therefore, appear that the adopted unit sizing does not consistently align with the DLP and should be re-assessed.
- 7 Sales values for affordable housing units appear to have been calculated with reference to average social and affordable rents, but no details of the calculation are provided. The lack of a transparent methodology prevents stakeholders from undertaking due diligence on the input assumptions applied, which is inappropriate.
- 8 Affordable home ownership ('AHO') properties appear to have been assessed at 65% of market value, which we regard as appropriate, but no assessment or justification for the adopted AHO values is provided within the UVS. The lack of methodology prevents stakeholders from undertaking due diligence on the input assumptions applied, which is inappropriate.
- 9 Two value levels are adopted within the draft Allocated Site Summary Appraisals with limited reasoning and no evidence to support the higher values. This approach is regarded as inappropriate and misleading.

- 10 The “lower” values adopted within the draft Allocated Site Summary Appraisals for Lytchett Matravers equate to £3,900 psm but Wyatt Homes regard currently achievable values at £3,000 - £3,400 psm for units within a development of scale.
- 11 UVS paragraph 2.5.1 states that RICS BCIS data shows that build costs have increased by circa 18% since the previous Purbeck viability assessment was completed. Paragraph 2.3.2 states that market sales prices have decreased by circa 13% in the same period, and it must be implied that viability has decreased in the period, although this direct comparison is not made within the UVS.
- 12 The UVS makes no reference to construction of garages. It must be anticipated that all 3 and 4 bed detached units will be provided with a single garage, mostly detached, and most semi-detached units are likely to have an attached or detached garage. The inclusion of garages is essential to reflect market expectations, and no costs are included within the UVS appraisals. Costs relate to construction (including base build, contingency and professional fees) and CIL payments, which will be calculated on the total garage gross floor area. The current assumption will overstate the financial viability of development sites tested.
- 13 In line with DLP Policy H9, UVS Appendix I states that ‘*Sites of 20+ dwellings require 5% to be provided as self-build plots*’. However, self-build plots are not modelled within the UVS appraisals, instead being replaced by market sale units. This is regarded as a short-cut approach requiring amendment to reflect the specific financial implications of developer’s delivering self-build plots.
- 14 The UVS states that rates of CIL adopted within all appraisals are in line with recommendations made to PBC in the 2016 Preliminary Draft Charging Schedule. The adopted approach is regarded as a short-cut, which fails to fully test the implications of varying rates of CIL liability on development despite clear statements in the UVS that market conditions have altered in the intervening period since 2016. This approach is not considered compliant with the CIL Regulations 2010 (as amended).
- 15 UVS Final Appendix 1 states that site works are included at £300,000 per hectare for generic site testing and £23,000 per plot for allocated sites. In addition, external works are stated to be assessed at 10% of base construction costs for flats and 15% of base construction costs for houses. The inclusion of external works within a “*site enabling cost / infrastructure*” allowance is inappropriate and holds potential to overstate the financial viability of development sites tested.
- 16 Contingency and professional fees are included in the draft allocated site appraisals at 3% and 7%. The UVS states that “*the adopted rates are 5% and 10%.*” Contingency and professional fees must be applied to the base construction costs and external works at 5% and 10% respectively. The current assumption erroneously reduces such costs and will overstate the financial viability of development sites tested.
- 17 UVS Appendix 1 states that finance costs on build and land are incorporated into viability testing at an interest rate of 6.5% (debit). Instead, the viability appraisals for draft site allocations include finance costs at a substantially lesser 6% debit rate and 2% credit rate with no reasoning provided for this differential assessment. The rates applied will erroneously reduce such costs and will overstate the financial viability of development sites tested.
- 18 Tables 3a and 3b within UVS Appendix IIc include comparisons between the residual land value (‘RLV’) generated via viability appraisal of each draft strategic site allocation and the existing use value (‘EUUV’) of each site, calculated at £25,000 per gross hectare. UVS Paragraph 2.11.11 states ‘*The figure that we consider representing the minimum land value likely to incentivise release for development under any circumstances in the local context is around £250,000/ha, based on gross site area.*’ It would, therefore appear that the Strategic Site Testing has been carried out with reference to an inappropriate benchmark land value (‘BLV’), which will significantly overstate the financial viability of development sites tested.
- 19 Full DLP policy costs do not appear to have been fully accommodated within the draft allocation site appraisals.
- 20 No details of the market housing or affordable housing sales rates are provided in the UVS. Appropriate and transparently presented cashflow modelling is essential and details must be provided for consultation review if the UVS is to accord with the requirements of Planning Practice Guidance (PPG).

Some of the issues raised in this representation document may, if viewed on an individual or isolated basis, appear incremental or relatively minor.

However, if considered comprehensively, and in the round, there is a very substantial cumulative effect, which will demonstrate that the UVS, as published, vastly overstates the financial viability of development within the district.

The conclusion of the combined implication of the above issues is that the DLP policies, if adopted, risk threatening the rate of delivery required to meet housing need and demand.

There is a significant risk that allocated sites will be delayed in negotiations on viability matters at the decision-making stage, or land owners will simply elect not to release their land at all. Failure to adopt realistic and achievable policies will ultimately result in the undermining and failure of the DLP.

Further detail regarding the concerns stated is provided under 'Matters of Representation' set out within chapter two of this document.

Viability in Plan-making

The Government published the revised National Planning Policy Framework (NPPF) (MHCLG (2018) National Planning Policy Framework) and updated National Planning Practice Guidance (PPG) in July 2018. Both the NPPF and PPG include an up-to-date position on the Government's intended role for viability assessment, the methodology, and procedures expected of all stakeholders in the preparation of such evidence.

Paragraph 31 of the NPPF confirms the following:

"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

Of greatest importance, paragraph 34 states:

"Such policies should not undermine the deliverability of the plan."

In practical terms, paragraph 57 states:

"All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available."

The Government's national planning guidance for undertaking viability in plan making is set out within National Planning Practice Guidance for Viability (PPG).

Paragraph 010 of PPG concisely defines the Government's objective for the role to be played by viability within the planning system:

"In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission" (MHCLG (2018) National Planning Practice Guidance – Viability: Paragraph: 010).

PPG is clear that the role for viability assessment is primarily at the plan making stage. Paragraph 002 confirms that the process must be inclusive and undertaken over several stages:

"Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers."

Policies introduced to the plan should be realistic and deliverable. Specifically:

"Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage" (MHCLG (2018) National Planning Practice Guidance – Viability: Paragraph: 002).

The role for viability assessment at the plan making stage is to ensure that policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. This is of particular importance for strategic sites, which should be assessed for their viability during plan making. Paragraph 005 states:

"It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan. This could include, for example, large sites, sites that provide a significant proportion of planned supply, sites that enable or unlock other development sites or sites within priority regeneration areas" (MHCLG (2018) National Planning Practice Guidance – Viability: Paragraph: 004).

Paragraph 020 confirms that the inputs and findings of any viability assessment should be set out in a way that aids clear interpretation and interrogation by decision makers.

Failure of the UVS to Reflect NPPF and PPG

It is the view of the Wyatt Homes that the UVS does not accord with, and in fact falls substantially short of, the Government's policy requirements and national guidance for the preparation of viability evidence to inform the drafting and testing of Local Plan policies. These deficiencies risk compromising the deliverability of the Local Plan, as drafted.

Policies included within the plan should be realistic and deliverable. They should be set to avoid recourse to viability assessment at the application stage.

The significant inconsistency between the proposed appraisal inputs written in the UVS and the figures actually adopted within the draft Allocated Sites Appraisal Summaries is wholly misleading and erroneous. The subsequent lack of clear explanation of the appraisal assessment results and conclusions arising fails to meet the requirements of Paragraph 020 of PPG.

Technical Matters in relation to Lytchett Matravers Sites *Sheltered Housing*

Sheltered housing is included at values which are inflated above standard market housing, with no reasoning and reference to comparables from only one scheme in the highest value area of the District Council. Construction costs are inflated above market housing with no RICS BCIS data or reasoning provided to support the uplift.

Ground Rents

Ground rents are not discussed within the UVS but appear to be included on certain market units at £250 per unit and certain sheltered apartments at £450 per unit. Ground rent income is capitalised at a 5% yield. Ground rent income and investment value is regarded as inappropriate for inclusion in the viability assessment. This approach is in line with wording within the DCLG "*Tackling unfair practices in the leasehold market - Summary of consultation responses and Government response*" (Department for Communities and Local Government: Tackling unfair practices in the leasehold market - Summary of consultation responses and Government response December 2017) document as published in December 2017, which, at Paragraph 69 states "*We will introduce legislation so that, in the future, ground rents on newly established leases of houses and flats are set at a peppercorn (zero financial value).*"

The inclusion of ground rents on market units is regarded as inappropriate and not in line with current market practice.

The Government may allow some flexibility for sheltered housing operators, but reduction of market housing ground rent to a nil value peppercorn would remove £105,000 of gross development value (GDV) from the viability appraisal of the draft site allocation at Lytchett Matravers, as one example.

Allocated Site Appraisal Unit Values

The draft Allocated Site Summary Appraisals attached at UVS Appendix IIc are based on two value levels, being "*Lower Values*" and "*Typical Values*". The "*Lower Values*" are described as "*fairly cautious*", whilst the "*Typical Values*" are set at 10% above the "*base set*" "*lower values*" in order to show "*what a large difference that assumption makes to the Residual Land Values*".

No justification or evidence is provided to support the 10% uplift in values, and the lack of reasoning or evidence to support the increased value variants applied within the viability appraisals is regarded as inappropriate and misleading.

The "lower" values adopted within the UVS Allocated Site Summary Appraisals for the draft site allocation at Lytchett Matravers equate to £3,900 psm but Wyatt Homes regard currently achievable values at £3,000 - £3,400 psm for units within a development of scale.

Flat Construction Costs

UVS Appendix 1 states that costs have been adopted in line with RICS BCIS median costs, with "*Mixed Developments – generally*" stated at £1,210 psm and "*Flats – generally*" at £1,378 psm.

However, flat construction costs are included in the UVS viability appraisals at the same £psm rate as housing construction costs.

Therefore, flat construction costs are £168 psm lower than the RICS BCIS source data. This appears to be an error, for no justification for this deviation is provided within the UVS.

When costs are increased to the appropriate £1,378 psm level, total flat construction costs within the viability appraisal of the draft site allocation at Lytchett Matravers will increase by circa £494,000.

External Works

No external works costs are included in the viability appraisals for draft site allocations.

UVS Para 2.5.3 and Figure 5 states that external works, contingencies and professional fees will be applied to the BCIS Median cost data, with a further £300,000/ha allowance for site wide works for generic site testing and £23,000 per unit for allocated site enabling costs / infrastructure.

UVS Final Appendix 1 states that in addition to the £300,000 per hectare and £23,000 per plot allowances for “*site works*”, external works are to be assessed at 10% of base construction costs for flats and 15% of base construction costs for houses.

In respect of “*site wide works*”, Paragraph 2.5.3 states that “*Different assumptions have been used in relation to the site allocations as discussed later in this report.*”

It is not clear, but UVS paragraph 2.10.5 appears to suggest that the £23,000 per plot allowance for “*site enabling cost / infrastructure*” is sufficient to accommodate all external works costs.

The £23,000 per plot allowance is stated to be in line with the Harman Guidance (Local Housing Delivery Group – “Viability Testing Local Plans” June 2012).

From the Harman Guidance, it is stated that “*Cost indices rarely provide data on the costs associated with providing serviced housing parcels, i.e. strategic infrastructure costs which are typically in the order of £17,000 - £23,000 per plot for larger scale schemes*”. The enabling costs referenced in the Harman Guidance do not include external works. The allowance relates to ‘big ticket’ items which must be incurred in order to release a site for development.

It appears that an appropriate allowance has been made for the costs which are required to release the larger site for development, but no costs have been applied for on-site external works such as roads, sewers, lighting, landscaping, fencing and driveways.

The inclusion of external works within a “*site enabling cost / infrastructure*” allowance is inappropriate and holds potential to produce an excessive viability assessment allowance is inappropriate and holds potential to produce an excessive viability assessment.

Contingency and professional fees must be applied to the cost of external works at 5% and 10% respectively, in line with the UVS methodology stated at Appendix 1. The contingency and professional fees allowances adopted for allocated sites are at reduced levels, and are discussed further in following paragraphs.

When external works are introduced to the viability appraisal of the draft site allocation at Lytchett Matravers, development costs increase by £2,167,034. Following application of contingency and professional fees, total costs increase by £2,492,089.

Any increase in construction costs can also reasonably be assumed to also increase finance requirements.

Contingency and Professional Fees

Contingency and professional fees are included in the draft allocated site appraisals at 3% and 7%. However, the UVS states that “*the adopted rates are 5% and 10%.*”

It is noted that UVS paragraph 2.10.3 states that:

“The specific inputs for each scenario appraisal are based on a mixture of information provided by the development industry following feedback received to a site promoters / developers survey issued by DSP and; high-level assumptions reflecting published information and our experience of viability work on similar sites in a range of other locations – both for strategic level assessment and site-specific viability review / s.106 negotiation purposes.”

It is not clearly stated that the allocated sites have been assessed on the basis of differential contingency or professional fees in comparison to non-allocated sites. Some allocated sites are comprised of a number of smaller sites, which produce a number of units in line with the non-allocated generic site testing, and any differential rate is regarded as highly inappropriate. No generic site appraisals are provided, so comparison of adopted methodology is impossible.

When contingency and professional fees are applied to base construction costs at 5% and 10% respectively, costs within the viability appraisal of the draft site allocation at Lytchett Matravers increase by £1,019,704.

Finance rate

UVS Appendix 1 states that finance costs on build and land are included within appraisals at a debit rate of at 6.5%. However, a 6% debit rate and 2% credit rate is instead applied within the draft site allocation appraisals with no reasoning provided for this differential assumption, which is regarded as inappropriate and falling outside market expectations. A 6.5% finance rate must be adopted consistently across all sites appraised.

Bungalows

Scheme typologies for 5-100 unit generic schemes are set out at UVS Appendix I, including 10% of market units as single storey units (bungalows). UVS Appendix I states that all schemes over 20 units will include 10% single storey units and we assume that the draft allocated sites are included on this basis.

Appendix 1 also shows RICS BCIS costs for bungalows at £1,309 psm in comparison to "*Mixed Developments – generally*" at £1,210 psm and states that "*Build cost taken as "Median" figure from BCIS for that build type unless otherwise stated - e.g. flats ; houses storey heights etc.*"

The RICS BCIS "*Mixed Developments – generally*" costs are regarded as acceptable for the assessment of two storey housing, but the higher costs relating to single storey units must be separately modelled, with the higher £1,309 psm rate applied to the market housing bungalows. Failure to adjust this will result in the UVS overstating the financial viability of development sites tested.

Specific modelling is required to reflect the differing nature of bungalow construction costs.

Unit Sizing

UVS paragraph 2.2.8 states that unit sizing relates to "*the nationally described space standard*". However, the Council's DLP states that "*The Council also considers that application of the Nationally Described Space Standards would be too prescriptive for a District with such varied townscapes as Purbeck*". It would, therefore, appear that the adopted unit sizing does not align with the DLP and should be re-assessed, with assumptions to be derived from the specific requirements of the various locations within the district, drawing on new build housing supply as evidence.

Strategic Site Scheme Typology

No scheme typologies are set out for the strategic sites, which is regarded as inappropriate, preventing the required level of cross reference/checking.

Affordable Housing Sales Values

Sales values for affordable housing units appear to have been calculated with reference to average social and affordable rents, but no details of the calculation are provided.

Affordable home ownership ('AHO') properties appear to have been assessed at 65% of market value, which we regard as appropriate, but no assessment of AHO values is provided within the UVS.

Details of the calculation of affordable housing values must be provided to enable stakeholder's review.

Self-build Plots

In line with DLP Policy H9, UVS Appendix I states that "*Sites of 20+ dwellings require 5% to be provided as self-build plots*".

UVS paragraph 2.6.12 states "*From DSP's experience of considering custom / self-build to date (albeit limited to early stages exploratory work on viability) we consider that the provision of plots for custom-build has the potential to be a sufficiently profitable activity so as not to prove a significant drag on overall site viability*".

The strategic site appraisals at UVS Appendix IIc include no reference to self-build plots and it appears that they have been included as market sale units, with values and costs applied in line with all other units. This appears to be a shortcut approach to the assessment of a specialist product which, in our opinion, holds the potential to negatively impact upon viability.

At a 5% provision, the strategic sites will be required to provide between 5-20 self-build plots depending on the size of the draft allocation.

No evidence is provided to prove that market demand is sufficient to sell the plots at an equivalent rate of sale to the market houses.

The provision of self-build plots will require the developer to incur certain costs of external works in respect of provision of roads, sewers and landscaping. The sale value will reflect the value of the land to the self-build market, which we regard as a specialist purchaser. Due diligent research, evidence and reasoning should be provided to support the approach to the assessment of self-build plots, rather than the adoption of a shortcut approach, which generates excessive values, costs and profit levels, potentially skewing the viability assessment in a positive or negative direction.

General Build Cost and Sales Value Inflation

UVS paragraph 2.5.1 states that RICS BCIS data shows that build costs have increased by circa 18% since the previous Purbeck viability assessment was completed. Paragraph 2.3.2 states that market sales prices have decreased by circa 13% in the same period, and it must be implied that viability has decreased in the period.

Garages

The UVS makes no reference to construction of garages.

It is to be expected that all 3 and 4 bed detached units will be provided with a single garage, mostly detached, and most semi-detached units are likely to have an attached or detached garage. The inclusion of garages is essential to reflect market expectations, yet no costs are included within the UVS appraisals.

Total costs relating to garages will be considerable – notably construction (including base build, contingency and professional fees) and S106 payments, which will be calculated on the garage gross floor area. The absence of garage construction within the UVS will result in the UVS overstating the financial viability of development sites tested.

Adopted Levels of CIL

The UVS states that rates of CIL adopted within all appraisals are in line with recommendations made to PBC in the 2016 Preliminary Draft Charging Schedule.

Therefore, CIL rates are prescribed and the appropriate level of CIL is not tested within the UVS. The level of viable CIL and viability buffer is not discussed, rather, the levels found to be viable in 2016 are adopted.

The UVS does not provide robust testing of the appropriate level of CIL to ensure viability, ensuring that scheme viability is assessed with an appropriate CIL buffer (e.g. 50%) adopted to ensure that schemes are not assessed at the margins of viability

The adopted approach is regarded as a short-cut, which is not CIL Regulation compliant.

DLP Policy Costs

Full DLP policy costs do not appear to have been fully accommodated within the draft allocation site appraisals.

For example, Policy H6 proposes that the draft allocated sites in Lytchett Matravers are expected to “*improve accessibility between Lytchett Matravers and Lytchett Minster by forming or improving defined walking and cycling routes between the villages*”.

The DLP policies will have a financial impact upon the proposed scheme and it is essential that viability modelling takes into account all costs.

The absence of full proposed policy cost within the UVS will result in the UVS overstating the financial viability of development sites tested.

Market and Affordable Housing Sales Rates

No details of the market housing sales rate applied in viability testing are provided in the UVS. In line with standard industry practice, it must be anticipated that the construction period of a development will fall in line with the rate of sale of the completed units. For the strategic sites, the build period is stated at 48 months for the 466-490 unit schemes and 24 months for the 90-150 unit schemes. Assuming a minimum of 6 months of construction prior to first unit sale, the remaining construction/sales period is reduced to 42 months and 18 months. On this basis, the sales rate applied appears to be between 5 units and 11.67 units per month, which is at the upper end of market expectations, even if the larger schemes are undertaken simultaneously by two developers.

No details are provided in respect of the rate of affordable housing sales assumed within any of the viability appraisals. Transparency in viability modelling is essential and details must be provided for stakeholder's review.

The adoption of a reduced development timeframe will produce an excessive viability assessment, as finance costs will be lower than would be generated with a more appropriate development timeframe. Details of the adopted development and sales timeframe assumptions must be provided for consultation review.

Conclusion

In order to illustrate the impact of correcting the perceived errors and inaccuracies in the inputs and methodology applied to viability assessment within the UVS, we have applied corrected figures to the Lytchett Matravers draft strategic site allocation appraisal. The impact will be consistently felt across all draft strategic site allocation appraisals – Lytchett Matravers is not exceptional, but has simply been used as a 'case study'.

Application of corrections to revenue and cost inputs, in line with the comments made above, will reduce the financial viability of the 150 unit scheme by at least £4,110,907.

Whilst we have not modelled the full cashflow impact at this stage, it is evident that financial viability will reduce further when interest is modelled against the revised values and costs, and further alterations are made in respect of other matters requiring clarification or alteration.

The "Lower Values" residual land ('RLV') value shown within UVS Appendix IIc is regarded as the "base set" of results, albeit the values adopted are not agreed. For the Lytchett Matravers site, applying developer's profit at 20% on market sale units and including sheltered housing, the RLV is £6,085,070. This is compared with the Existing Use Value (EUV) of the site at £207,500 to indicate an "Uplift from EUV" equating to 2,833%.

Applying initial alterations to values and costs, as set out above, will decrease the RLV to £1,974,163.

The comparison of RLV with EUV is regarded as highly misleading and inappropriate.

UVS Paragraph 2.11.11 states:

"The figure that we consider representing the minimum land value likely to incentivise release for development under any circumstances in the local context is around £250,000/ha, based on gross site area."

UVS Paragraph 2.11.14 states:

"The EUV+ BLVs used within the study therefore range between £250,000/ha for greenfield land (including a significant uplift from existing agricultural values) to approximately £1.5m for residential land in existing use. The appendices to this report set out the specific BLV used for each scenario."

It would, therefore appear that the Strategic Site Testing should be carried out on the basis of a minimum £250,000 per gross hectare land value. For the 8.3ha Lytchett Matravers site, this would produce a benchmark land value of £2,075,000.

If the identified deductions of £4,110,907 are applied to the RLV, this reduces the RLV below (-4.86%) the BLV of £250,000 per ha. This demonstrates that the financial viability is precarious when accommodating all costs arising from the draft Local Plan, and would be likely to necessitate a viability submission at the planning application stage unless draft policies are modified and applied with greater flexibility.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

In order to resolve the stated concerns, Wyatt Homes requests that PDC:

- 1 Reviews all representations submitted with respect to the UVS and produces a detailed Report on Consultation that addresses each issue raised by each party on a clear and transparent basis.

- 2 Re-tests the financial viability of planned development as set out within the UVS by adopting all of the recommendations set out by Wyatt Homes in this representation document. Sensitivity testing of isolated aspects independently will not provide a robust and holistic basis for formulating conclusions on the impact of refinements upon the viability of development within the district.
- 3 Instructs DSP, as PDC's advisors, to produce for consultation a more detailed, transparent and complete assessment of viability for consultation (taking into account the above points) so that consultees have the opportunity to assess both the inputs and proposed outputs from a fully informed position in accordance with both NPPF and PPG. It is essential that any re-testing is supported by detailed conclusions which clearly explain the results of the viability testing. The UVS includes numerous tables of results based on a wide range of BLVs, or EUVs, with minimal explanation or reasoned conclusions provided on the meaning of their results, which is regarded as lacking transparency and potentially misleading.
- 4 Refines Policies H9 Housing Mix and H11 Affordable Housing within the DLP such that the policies are directly representative of the refined viability evidence base, and are therefore realistic, achievable and deliverable from the outset.

It is Wyatt Homes' considered view that, in conducting the above due diligence, it will be necessary for PDC to exercise considerable flexibility in the application of draft Local Plan policies. Notably, with respect to:

- 1 reducing the proportion of affordable housing sought from the percentages set in draft Policy H11;
- 2 adjustment of the affordable housing tenure mix sought via draft Policy H11 in favour of low cost home ownership tenures, whilst reducing the proportion of rented affordable tenures; and
- 3 reducing the Policy H9 requirement for 20% specialist purpose built accommodation for the elderly, the provision of self-build plots or single storey homes; or
- 4 a combination of all the above mechanisms.

Should Wyatt Homes' stated concerns remain unresolved by PDC, then further technical feasibility testing will be undertaken by Wyatt Homes in advance of the Examination in Public of the draft Local Plan, and evidence submitted to PDC and the Planning Inspectorate accordingly.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Wyatt Homes has a range of interests across the north east of the district, a number of which are being proposed for allocation by the Pre-Submission Purbeck Local Plan. Whilst our client is generally supportive of the Local Plan, there are a number of areas where there is concern that the Local Plan, as drafted, is not yet 'sound' but can be made so through a range of plan modification that we have proposed. Our client considers it important to attend the hearing sessions to assist the Council in exploring the areas where the plan is not yet sound and reaching a position whereby it may become so.

Comment

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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wyatt Homes (- 1190024)
Comment ID	PLPP491
Response Date	03/12/18 17:29
Consultation Point	Affordable housing need (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Paragraphs 161 - 165 (viability evidence base)
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Overall Comments in relation viability evidence regarding Upton sites

This representation has been prepared by Turley on behalf of Wyatt Homes.

It provides a technical review and commentary in respect of the Purbeck District Council ('PDC') Updated Viability Study ('UVS') to Support PDC's Pre-submission Draft Local Plan ('DLP') and Revised Community Infrastructure Levy ('CIL'), as prepared by Dixon Searle Partnership ('DSP') and published in October 2018.

The UVS was published as part of PDC's Pre-submission Draft Local Plan Regulation 19 public consultation.

The UVS, along with previous work undertaken by DSP are stated within the UVS to provide *"the viability evidence to support the emerging Development Plan of the Council"*.

In particular, the aim of the UVS is stated to be to *"inform and support the local plan review and further inform the review of the Community Infrastructure Levy; and site specific assessments for key sites."*

"High level viability testing" of draft site allocations has been carried out "to provide the Council with information on the potential deliverability of residential development at those sites (in a viability sense) and the potential level of affordable housing and other s106 that could be secured in each location."

If the Local Plan is to be sound and deliverable, it is essential that the underpinning viability testing of its draft policies is conducted in a collaborative, comprehensive, evidenced and transparent basis, which accords with the Government's national policies and guidance.

The following issues have been identified within the methodology applied in the viability appraisals testing draft site allocations, which will be further detailed within the Technical Matters section of this representation:

- 1 Evidence should be provided to support the values and construction costs used for the testing of Sheltered housing.
- 2 Ground rent investment income is included within the draft site allocation appraisals despite the Government's proposal to restrict ground rents to peppercorn levels. The current assumption will produce an excessive level of financial viability within the published evidence.
- 3 Flat construction costs are included within the draft site allocation viability appraisals at a rate which is £168 per square metre (psm) lower than the RICS BCIS evidence data to which the evidence base refers. The current assumption will overstate the financial viability of development sites tested.
- 4 10% of units are stated to be bungalows, in line with DLP Policy H9, however, no bungalows are included in the draft Allocated Site Summary Appraisals attached at UVS Appendix IIc. Bungalows are regarded as a separate product from standard two storey housing, driving a different profile of values and construction costs which must be assessed and evidenced separately.
- 5 No scheme typologies are set out for the draft strategic site allocations. This is regarded as inappropriate and opaque as it prevents stakeholders from analysing whether the scheme mix and measurements are reflective of the expectations within the DLP.
- 6 The UVS states that unit sizing relates to 'the nationally described space standard'. However, the Council's DLP states that 'The Council also considers that application of the Nationally Described Space Standards would be too prescriptive for a District with such varied townscapes as Purbeck'. It would, therefore, appear that the adopted unit sizing does not consistently align with the DLP and should be re-assessed.
- 7 Sales values for affordable housing units appear to have been calculated with reference to average social and affordable rents, but no details of the calculation are provided. The lack of a transparent methodology prevents stakeholders from undertaking due diligence on the input assumptions applied, which is inappropriate.

- 8 Affordable home ownership ('AHO') properties appear to have been assessed at 65% of market value, which we regard as appropriate, but no assessment or justification for the adopted AHO values is provided within the UVS. The lack of methodology prevents stakeholders from undertaking due diligence on the input assumptions applied, which is inappropriate.
- 9 Two value levels are adopted within the draft Allocated Site Summary Appraisals with limited reasoning and no evidence to support the higher values. This approach is regarded as inappropriate and misleading.
- 10 The "lower" values adopted within the draft Allocated Site Summary Appraisals for Upton adopt sales values at £3,300 psm whereas Wyatt Homes regard currently achievable values at £3,000 - £3,300 psm for units within a development of scale.
- 11 UVS paragraph 2.5.1 states that RICS BCIS data shows that build costs have increased by circa 18% since the previous Purbeck viability assessment was completed. Paragraph 2.3.2 states that market sales prices have decreased by circa 13% in the same period, and it must be implied that viability has decreased in the period, although this direct comparison is not made within the UVS.
- 12 The UVS makes no reference to construction of garages. It must be anticipated that all 3 and 4 bed detached units will be provided with a single garage, mostly detached, and most semi-detached units are likely to have an attached or detached garage. The inclusion of garages is essential to reflect market expectations, and no costs are included within the UVS appraisals. Costs relate to construction (including base build, contingency and professional fees) and CIL payments, which will be calculated on the total garage gross floor area. The current assumption will overstate the financial viability of development sites tested.
- 13 In line with DLP Policy H9, UVS Appendix I states that '*Sites of 20+ dwellings require 5% to be provided as self-build plots*'. However, self-build plots are not modelled within the UVS appraisals, instead being replaced by market sale units. This is regarded as a short-cut approach requiring amendment to reflect the specific financial implications of developer's delivering self-build plots.
- 14 The UVS states that rates of CIL adopted within all appraisals are in line with recommendations made to PBC in the 2016 Preliminary Draft Charging Schedule. The adopted approach is regarded as a short-cut, which fails to fully test the implications of varying rates of CIL liability on development despite clear statements in the UVS that market conditions have altered in the intervening period since 2016. This approach is not considered compliant with the CIL Regulations 2010 (as amended).
- 15 UVS Final Appendix 1 states that site works are included at £300,000 per hectare for generic site testing and £23,000 per plot for allocated sites. In addition, external works are stated to be assessed at 10% of base construction costs for flats and 15% of base construction costs for houses. The inclusion of external works within a "*site enabling cost / infrastructure*" allowance is inappropriate and holds potential to overstate the financial viability of development sites tested.
- 16 Contingency and professional fees are included in the draft allocated site appraisals at 3% and 7%. The UVS states that "*the adopted rates are 5% and 10%.*" Contingency and professional fees must be applied to the base construction costs and external works at 5% and 10% respectively. The current assumption erroneously reduces such costs and will overstate the financial viability of development sites tested.
- 17 UVS Appendix 1 states that finance costs on build and land are incorporated into viability testing at an interest rate of 6.5% (debit). Instead, the viability appraisals for draft site allocations include finance costs at a substantially lesser 6% debit rate and 2% credit rate with no reasoning provided for this differential assessment. The rates applied will erroneously reduce such costs and will overstate the financial viability of development sites tested.
- 18 Tables 3a and 3b within UVS Appendix IIc include comparisons between the residual land value ('RLV') generated via viability appraisal of each draft strategic site allocation and the existing use value ('EUV') of each site, calculated at £25,000 per gross hectare. UVS Paragraph 2.11.11 states '*The figure that we consider representing the minimum land value likely to incentivise release for development under any circumstances in the local context is around £250,000/ha, based on gross site area.*' It would, therefore appear that the Strategic Site Testing has been carried out with reference to an inappropriate benchmark land value ('BLV'), which will significantly overstate the financial viability of development sites tested.
- 19 Full DLP policy costs do not appear to have been fully accommodated within the draft allocation site appraisals.
- 20 No details of the market housing or affordable housing sales rates are provided in the UVS. Appropriate and transparently presented cashflow modelling is essential and details must be

provided for consultation review if the UVS is to accord with the requirements of Planning Practice Guidance (PPG).

Some of the issues raised in this representation document may, if viewed on an individual or isolated basis, appear incremental or relatively minor.

However, if considered comprehensively, and in the round, there is a very substantial cumulative effect, which will demonstrate that the UVS, as published, vastly overstates the financial viability of development within the district.

The conclusion of the combined implication of the above issues is that the DLP policies, if adopted, risk threatening the rate of delivery required to meet housing need and demand.

There is a significant risk that allocated sites will be delayed in negotiations on viability matters at the decision-making stage, or land owners will simply elect not to release their land at all. Failure to adopt realistic and achievable policies will ultimately result in the undermining and failure of the DLP.

Further detail regarding the concerns stated is provided under 'Matters of Representation' set out within chapter two of this document.

Viability in Plan-making

The Government published the revised National Planning Policy Framework (NPPF) (MHCLG (2018) National Planning Policy Framework) and updated National Planning Practice Guidance (PPG) in July 2018. Both the NPPF and PPG include an up-to-date position on the Government's intended role for viability assessment, the methodology, and procedures expected of all stakeholders in the preparation of such evidence.

Paragraph 31 of the NPPF confirms the following:

"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

Of greatest importance, paragraph 34 states:

Such policies should not undermine the deliverability of the plan.

In practical terms, paragraph 57 states:

"All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available."

The Government's national planning guidance for undertaking viability in plan making is set out within National Planning Practice Guidance for Viability (PPG).

Paragraph 010 of PPG concisely defines the Government's objective for the role to be played by viability within the planning system:

"In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission" (MHCLG (2018) National Planning Practice Guidance – Viability: Paragraph: 010).

PPG is clear that the role for viability assessment is primarily at the plan making stage. Paragraph 002 confirms that the process must be inclusive and undertaken over several stages:

"Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers."

Policies introduced to the plan should be realistic and deliverable. Specifically:

"Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage" (MHCLG (2018) National Planning Practice Guidance – Viability: Paragraph: 002).

The role for viability assessment at the plan making stage is to ensure that policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. This

is of particular importance for strategic sites, which should be assessed for their viability during plan making. Paragraph 005 states:

“It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan. This could include, for example, large sites, sites that provide a significant proportion of planned supply, sites that enable or unlock other development sites or sites within priority regeneration areas” (MHCLG (2018) National Planning Practice Guidance – Viability: Paragraph: 004).

Paragraph 020 confirms that the inputs and findings of any viability assessment should be set out in a way that aids clear interpretation and interrogation by decision makers.

Failure of the UVS to Reflect NPPF and PPG

It is the view of the Wyatt Homes that the UVS does not accord with, and in fact falls substantially short of, the Government’s policy requirements and national guidance for the preparation of viability evidence to inform the drafting and testing of Local Plan policies. These deficiencies risk compromising the deliverability of the Local Plan, as drafted.

Policies included within the plan should be realistic and deliverable. They should be set to avoid recourse to viability assessment at the application stage.

The significant inconsistency between the proposed appraisal inputs written in the UVS and the figures actually adopted within the draft Allocated Sites Appraisal Summaries is wholly misleading and erroneous. The subsequent lack of clear explanation of the appraisal assessment results and conclusions arising fails to meet the requirements of Paragraph 020 of PPG.

Technical Matters in relation to Upton Sites

Sheltered Housing

Sheltered housing is included at values which are inflated above standard market housing, with no reasoning and reference to comparables from only one scheme in the highest value area of the District Council. Construction costs are inflated above market housing with no RICS BCIS data or reasoning provided to support the uplift.

Ground Rents

Ground rents are not discussed within the UVS but appear to be included on certain market units at £250 per unit and certain sheltered apartments at £450 per unit. Ground rent income is capitalised at a 5% yield. Ground rent income and investment value is regarded as inappropriate for inclusion in the viability assessment. This approach is in line with wording within the DCLG *“Tackling unfair practices in the leasehold market - Summary of consultation responses and Government response”*[1] document as published in December 2017, which, at Paragraph 69 states *“We will introduce legislation so that, in the future, ground rents on newly established leases of houses and flats are set at a peppercorn (zero financial value).”*

The inclusion of ground rents on market units is regarded as inappropriate and not in line with current market practice.

Allocated Site Appraisal Unit Values

The draft Allocated Site Summary Appraisals attached at UVS Appendix IIc are based on two value levels, being *“Lower Values”* and *“Typical Values”*. The *“Lower Values”* are described as *“fairly cautious”*, whilst the *“Typical Values”* are set at 10% above the *“base set” “lower values”* in order to show *“what a large difference that assumption makes to the Residual Land Values”*.

No justification or evidence is provided to support the 10% uplift in values, and the lack of reasoning or evidence to support the increased value variants applied within the viability appraisals is regarded as inappropriate and misleading.

The *“lower”* values adopted within the UVS Allocated Site Summary Appraisals for the draft site allocation at Upton equate to £3,300 psm but Wyatt Homes regard currently achievable values at £3,000 - £3,300 psm for units within a development of scale.

Flat Construction Costs

UVS Appendix 1 states that costs have been adopted in line with RICS BCIS median costs, with *“Mixed Developments – generally”* stated at £1,210 psm and *“Flats – generally”* at £1,378 psm.

However, flat construction costs are included in the UVS viability appraisals at the same £psm rate as housing construction costs.

Therefore, flat construction costs are £168 psm lower than the RICS BCIS source data. This appears to be an error, for no justification for this deviation is provided within the UVS.

External Works

No external works costs are included in the viability appraisals for draft site allocations.

UVS Para 2.5.3 and Figure 5 states that external works, contingencies and professional fees will be applied to the BCIS Median cost data, with a further £300,000/ha allowance for site wide works for generic site testing and £23,000 per unit for allocated site enabling costs / infrastructure.

UVS Final Appendix 1 states that in addition to the £300,000 per hectare and £23,000 per plot allowances for “*site works*”, external works are to be assessed at 10% of base construction costs for flats and 15% of base construction costs for houses.

In respect of “*site wide works*”, Paragraph 2.5.3 states that “*Different assumptions have been used in relation to the site allocations as discussed later in this report.*”

It is not clear, but UVS paragraph 2.10.5 appears to suggest that the £23,000 per plot allowance for “*site enabling cost / infrastructure*” is sufficient to accommodate all external works costs.

The £23,000 per plot allowance is stated to be in line with the Harman Guidance (Local Housing Delivery Group – “*Viability Testing Local Plans*” June 2012).

From the Harman Guidance, it is stated that “*Cost indices rarely provide data on the costs associated with providing serviced housing parcels, i.e. strategic infrastructure costs which are typically in the order of £17,000 - £23,000 per plot for larger scale schemes*”. The enabling costs referenced in the Harman Guidance do not include external works. The allowance relates to ‘big ticket’ items which must be incurred in order to release a site for development.

It appears that an appropriate allowance has been made for the costs which are required to release the larger site for development, but no costs have been applied for on-site external works such as roads, sewers, lighting, landscaping, fencing and driveways.

The inclusion of external works within a “*site enabling cost / infrastructure*” allowance is inappropriate and holds potential to produce an excessive viability assessment allowance is inappropriate and holds potential to produce an excessive viability assessment.

Contingency and professional fees must be applied to the cost of external works at 5% and 10% respectively, in line with the UVS methodology stated at Appendix 1. The contingency and professional fees allowances adopted for allocated sites are at reduced levels, and are discussed further in following paragraphs.

Any increase in construction costs can also reasonably be assumed to also increase finance requirements.

Contingency and Professional Fees

Contingency and professional fees are included in the draft allocated site appraisals at 3% and 7%. However, the UVS states that “*the adopted rates are 5% and 10%.*”

It is noted that UVS paragraph 2.10.3 states that “*the specific inputs for each scenario appraisal are based on a mixture of information provided by the development industry following feedback received to a site promoters / developers survey issued by DSP and; high-level assumptions reflecting published information and our experience of viability work on similar sites in a range of other locations – both for strategic level assessment and site-specific viability review / s.106 negotiation purposes.*”

It is not clearly stated that the allocated sites have been assessed on the basis of differential contingency or professional fees in comparison to non-allocated sites. Some allocated sites are comprised of a number of smaller sites, which produce a number of units in line with the non-allocated generic site testing, and any differential rate is regarded as highly inappropriate. No generic site appraisals are provided, so comparison of adopted methodology is impossible.

Finance rate

UVS Appendix 1 states that finance costs on build and land are included within appraisals at a debit rate of at 6.5%. However, a 6% debit rate and 2% credit rate is instead applied within the draft site allocation appraisals with no reasoning provided for this differential assumption, which is regarded as

inappropriate and falling outside market expectations. A 6.5% finance rate must be adopted consistently across all sites appraised.

Bungalows

Scheme typologies for 5-100 unit generic schemes are set out at UVS Appendix I, including 10% of market units as single storey units (bungalows). UVS Appendix I states that all schemes over 20 units will include 10% single storey units and we assume that the draft allocated sites are included on this basis.

Appendix 1 also shows RICS BCIS costs for bungalows at £1,309 psm in comparison to “*Mixed Developments – generally*” at £1,210 psm and states that “*Build cost taken as “Median” figure from BCIS for that build type unless otherwise stated - e.g. flats ; houses storey heights etc.*”

The RICS BCIS “*Mixed Developments – generally*” costs are regarded as acceptable for the assessment of two storey housing, but the higher costs relating to single storey units must be separately modelled, with the higher £1,309 psm rate applied to the market housing bungalows. Failure to adjust this will result in the UVS overstating the financial viability of development sites tested.

Specific modelling is required to reflect the differing nature of bungalow construction costs.

Unit Sizing

UVS paragraph 2.2.8 states that unit sizing relates to “*the nationally described space standard*”. However, the Council’s DLP states that “*The Council also considers that application of the Nationally Described Space Standards would be too prescriptive for a District with such varied townscapes as Purbeck*”. It would, therefore, appear that the adopted unit sizing does not align with the DLP and should be re-assessed, with assumptions to be derived from the specific requirements of the various locations within the district, drawing on new build housing supply as evidence.

Strategic Site Scheme Typology

No scheme typologies are set out for the strategic sites, which is regarded as inappropriate, preventing the required level of cross reference/checking.

Affordable Housing Sales Values

Sales values for affordable housing units appear to have been calculated with reference to average social and affordable rents, but no details of the calculation are provided.

Affordable home ownership (‘AHO’) properties appear to have been assessed at 65% of market value, which we regard as appropriate, but no assessment of AHO values is provided within the UVS.

Details of the calculation of affordable housing values must be provided to enable stakeholder’s review.

Self-build Plots

In line with DLP Policy H9, UVS Appendix I states that “*Sites of 20+ dwellings require 5% to be provided as self-build plots*”.

UVS paragraph 2.6.12 states “*From DSP’s experience of considering custom / self-build to date (albeit limited to early stages exploratory work on viability) we consider that the provision of plots for custom-build has the potential to be a sufficiently profitable activity so as not to prove a significant drag on overall site viability*”.

The strategic site appraisals at UVS Appendix IIc include no reference to self-build plots and it appears that they have been included as market sale units, with values and costs applied in line with all other units. This appears to be a shortcut approach to the assessment of a specialist product which, in our opinion, holds the potential to negatively impact upon viability.

At a 5% provision, the strategic sites will be required to provide between 5-20 self-build plots depending on the size of the draft allocation.

No evidence is provided to prove that market demand is sufficient to sell the plots at an equivalent rate of sale to the market houses.

The provision of self-build plots will require the developer to incur certain costs of external works in respect of provision of roads, sewers and landscaping. The sale value will reflect the value of the land to the self-build market, which we regard as a specialist purchaser. Due diligent research, evidence and reasoning should be provided to support the approach to the assessment of self-build plots, rather than the adoption of a shortcut approach, which generates excessive values, costs and profit levels, potentially skewing the viability assessment in a positive or negative direction.

General Build Cost and Sales Value Inflation

UVS paragraph 2.5.1 states that RICS BCIS data shows that build costs have increased by circa 18% since the previous Purbeck viability assessment was completed. Paragraph 2.3.2 states that market sales prices have decreased by circa 13% in the same period, and it must be implied that viability has decreased in the period.

Garages

The UVS makes no reference to construction of garages.

It is to be expected that all 3 and 4 bed detached units will be provided with a single garage, mostly detached, and most semi-detached units are likely to have an attached or detached garage. The inclusion of garages is essential to reflect market expectations, yet no costs are included within the UVS appraisals.

Total costs relating to garages will be considerable – notably construction (including base build, contingency and professional fees) and S106 payments, which will be calculated on the garage gross floor area. The absence of garage construction within the UVS will result in the UVS overstating the financial viability of development sites tested.

Adopted Levels of CIL

The UVS states that rates of CIL adopted within all appraisals are in line with recommendations made to PBC in the 2016 Preliminary Draft Charging Schedule.

Therefore, CIL rates are prescribed and the appropriate level of CIL is not tested within the UVS. The level of viable CIL and viability buffer is not discussed, rather, the levels found to be viable in 2016 are adopted.

The UVS does not provide robust testing of the appropriate level of CIL to ensure viability, ensuring that scheme viability is assessed with an appropriate CIL buffer (e.g. 50%) adopted to ensure that schemes are not assessed at the margins of viability

The adopted approach is regarded as a short-cut, which is not CIL Regulation compliant.

DLP Policy Costs

Full DLP policy costs do not appear to have been fully accommodated within the draft allocation site appraisals.

For example, Policy H7 proposes that housing development on the draft allocated site at Upton will be expected to “include details of mitigation measures to avoid the adverse effects of traffic noise from the adjoining A35 on the occupants of new homes”.

The DLP policies will have a financial impact upon the proposed scheme and it is essential that viability modelling takes into account all costs.

The absence of full proposed policy cost within the UVS will result in the UVS overstating the financial viability of development sites tested.

Market and Affordable Housing Sales Rates

No details of the market housing sales rate applied in viability testing are provided in the UVS. In line with standard industry practice, it must be anticipated that the construction period of a development will fall in line with the rate of sale of the completed units. For the strategic sites, the build period is stated at 48 months for the 466-490 unit schemes and 24 months for the 90-150 unit schemes. Assuming a minimum of 6 months of construction prior to first unit sale, the remaining construction/sales period is reduced to 42 months and 18 months. On this basis, the sales rate applied appears to be between 5 units and 11.67 units per month, which is at the upper end of market expectations, even if the larger schemes are undertaken simultaneously by two developers.

No details are provided in respect of the rate of affordable housing sales assumed within any of the viability appraisals. Transparency in viability modelling is essential and details must be provided for stakeholder’s review.

The adoption of a reduced development timeframe will produce an excessive viability assessment, as finance costs will be lower than would be generated with a more appropriate development timeframe. Details of the adopted development and sales timeframe assumptions must be provided for consultation review.

[1] Department for Communities and Local Government: Tackling unfair practices in the leasehold market - Summary of consultation responses and Government response December 2017.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

In order to resolve the stated concerns, Wyatt Homes requests that PDC:

- 1 Reviews all representations submitted with respect to the UVS and produces a detailed Report on Consultation that addresses each issue raised by each party on a clear and transparent basis.
- 2 Re-tests the financial viability of planned development as set out within the UVS by adopting all of the recommendations set out by Wyatt Homes in this representation document. Sensitivity testing of isolated aspects independently will not provide a robust and holistic basis for formulating conclusions on the impact of refinements upon the viability of development within the district.
- 3 Instructs DSP, as PDC's advisors, to produce for consultation a more detailed, transparent and complete assessment of viability for consultation (taking into account the above points) so that consultees have the opportunity to assess both the inputs and proposed outputs from a fully informed position in accordance with both NPPF and PPG. It is essential that any re-testing is supported by detailed conclusions which clearly explain the results of the viability testing. The UVS includes numerous tables of results based on a wide range of BLVs, or EUVs, with minimal explanation or reasoned conclusions provided on the meaning of their results, which is regarded as lacking transparency and potentially misleading.
- 4 Refine Policies H9 Housing Mix and H11 Affordable Housing within the DLP such that the policies are directly representative of the refined viability evidence base, and are therefore realistic, achievable and deliverable from the outset.

It is Wyatt Homes' considered view that, in conducting the above due diligence, it will be necessary for PDC to exercise considerable flexibility in the application of draft Local Plan policies. Notably, with respect to:

- 1 reducing the proportion of affordable housing sought from the percentages set in draft Policy H11;
- 2 adjustment of the affordable housing tenure mix sought via draft Policy H11 in favour of low cost home ownership tenures, whilst reducing the proportion of rented affordable tenures; and
- 3 reducing the Policy H9 requirement for 20% specialist purpose built accommodation for the elderly, the provision of self-build plots or single storey homes; or
- 4 a combination of all the above mechanisms.

Should Wyatt Homes' stated concerns remain unresolved by PDC, then further technical feasibility testing will be undertaken by Wyatt Homes in advance of the Examination in Public of the draft Local Plan, and evidence submitted to PDC and the Planning Inspectorate accordingly.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Wyatt Homes has a range of interests across the north east of the district, a number of which are being proposed for allocation by the Pre-Submission Purbeck Local Plan. Whilst our client is generally supportive of the Local Plan, there are a number of areas where there is concern that the Local Plan, as drafted, is not yet 'sound' but can be made so through a range of plan modification that we have

proposed. Our client considers it important to attend the hearing sessions to assist the Council in exploring the areas where the plan is not yet sound and reaching a position whereby it may become so.