

Dorset Council

Purbeck Local Plan (2018-2034)

Response to Inspector's Matters, Issues and Questions

Matter A: Legal Compliance and Procedural Requirements

7 June 2019

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Matter A

Issue 1: Duty to Co-operate

Question 1

Did the Council comply with the Duty to Co-operate as required by section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) having regard to the advice contained in the National Planning Policy Framework (the Framework) and the Planning Practice Guidance (PPG)?

1. Yes. The Council has pro-actively and constructively engaged on strategic cross-boundary matters with other Councils on an ongoing basis. Throughout the drafting of the Purbeck Local Plan joint working has taken place between the following councils:
 - a) Bournemouth Borough Council;
 - b) Christchurch Borough Council;
 - c) Dorset County Council;
 - d) East Dorset District Council;
 - e) North Dorset District Council;
 - f) Borough of Poole;
 - g) Purbeck District Council; and
 - h) West Dorset District Council and Weymouth & Portland Borough Council.

This is evidenced in the Dorset Statement of Common Ground [SD10a]. The statement has been prepared to demonstrate engagement between councils (as stipulated in section 33A of Planning and Compulsory Purchase Act 2004) and in order to specifically comply with the requirements of paragraph 27 of National Planning Policy Framework (NPPF) (2019).

2. The form and content of the initial statement of common ground prepared by the councils, and then finalised in March 2019 (prior to local government reorganisation in Dorset), is consistent with the guidance provided in Planning Practice Guidance. In particular the statement of common ground:
 - a) identifies the administrative area that it relates to (paragraph 8, SD10a);
 - b) identifies the key strategic cross boundary matters addressed, or to be addressed, through joint working (including: housing need, unmet housing needs from areas adjoining Dorset, housing mix, green belt, accommodation for gypsies, travellers and travelling show people, economy and employment land requirements, retail/leisure/commercial development, infrastructure, health/security/community and cultural infrastructure and climate change/conservation and enhancement of the natural and historic environment);

- c) identifies the relevant plan making bodies who are signatories (pages 31 and 32, SD10a);
- d) describes governance arrangements for the statement (paragraphs 3 – 7, SD10a);
- e) identifies housing requirements for the area covered by the statement ('Table 2: Comparison of current adopted local plan housing targets and published figures resulting from the new standard methodology (2017)', SD10a);
- f) describes the councils' approach to addressing housing requirements across the area (paragraphs 22-23, SD10a);
- g) records agreed approaches to strategic matters (i.e. approach to addressing any unmet housing need; need for particular house types within the same housing market areas, jointly preparing evidence relating to economy/employment land and retail needs/flood risk, preparing minerals/waste plans for the area, jointly preparing strategies for green infrastructure and jointly preparing and adopting planning frameworks for addressing the effects of development on European sites).

Question 2

a) What strategic matters have been identified through the preparation of the Local Plan and what co-operation took place to resolve them? b) Has the co-operation between authorities been constructive and proactive?

3. The following four main strategic matters have been identified through the preparation of the Purbeck Local Plan:
 - a) identifying and planning to meet the area's housing requirements (including plots and pitches for gypsies, travellers and travelling show people and unmet need from neighbouring areas);
 - b) supporting economic growth across Purbeck and the wider area;
 - c) allocating land for retail needs, and encouraging retail development at key housing sites that will support sustainable patterns of development in Purbeck; and
 - d) conserving the natural environment (specifically Dorset's lowland heathland and Poole Harbour).
4. Dorset councils created the Strategic Planning Forum (SPF) in 2015 (paragraph 1.18, 'SD09-Duty to co-operate statement') to allow councils, and prescribed bodies/persons, to proactively and constructively engage with on strategic matters across Dorset. The SPF has met regularly and on an ongoing basis since 2015. (Review of the adopted Purbeck Local Plan Part 1 started in 2013).
5. *Housing requirements* - Purbeck forms part of the Eastern Dorset Housing Market Area, that also included the district councils of East Dorset and North Dorset and the Borough Councils of Bournemouth, Christchurch and Poole ('Map 1: Dorset housing market areas', 'SD-10a Dorset statement of common ground'). These councils constructively co-operated with one another to prepare a joint Strategic Housing Market Assessment

(SHMA), published in 2015, in order to assess housing requirements across the housing market area. This jointly prepared assessment provided the basis for taking decisions about the distribution of housing development across the housing market area. (In the light of changing circumstances, the SHMA assessments relating to Borough of Poole and Purbeck District Council areas have subsequently been updated to support the preparation of local plans in these areas). As a starting point each council has sought to meet the housing requirements within their housing areas – Table 4 of the statement of common ground summarises which of the councils are likely to meet their requirements. Most councils have indicated that their housing requirements can be addressed within their boundaries, but there are still uncertainties over the distribution of any un-meet housing need. As a consequence there is no formal agreement between councils on the distribution of any un-met housing requirement across Dorset. The SPF, the preparation of new plans for the newly formed Dorset and Bournemouth, Christchurch and Poole Councils and further evidence (relating to the performance of the south east Dorset green belt) will allow constructive joint working on the distribution of housing development (including development needed to address any unmet need) to continue.

6. The Dorset councils have also worked constructively around identifying need for pitches and plots for gypsies, travellers and travelling showpeople (Bournemouth, Christchurch, East Dorset, North Dorset, Poole, Purbeck, West Dorset and Weymouth & Portland, Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Final Report October 2017). As part of work on a joint development plan document the councils have also completed a Regulation 18 'issues and options' consultation (2011-2012), and a further consultation on 'additional sites' (2014-2015), for gypsy, traveller and travelling showpeople site allocations. The Council has outlined an appropriate strategy for meeting the limited need identified in the 2017 accommodation assessment for pitches and plots in the Purbeck area. The Council expects that constructive work on meeting the need for pitches and plots for gypsies, travellers and travelling showpeople will continue. Dorset Council's Cabinet is due to consider a new Local Development Scheme for the Council's area on 25 June 2019, and this is likely to include consideration of how best to take forward work to identify sites for gypsies, travellers and travelling showpeople.
7. *Supporting economic growth across Purbeck and the wider area* - Councils have worked together, in conjunction with the Local Enterprise Partnership (LEP), to identify and allocate the land needed to support economic growth across Dorset. This collaboration has involved jointly preparing evidence (The Bournemouth, Dorset and Poole Workspace Strategy, 2016, SD26) to inform the employment strategies in their local plans and supporting delivery of the objectives described in the LEP's strategic economic plan 'Transforming Dorset'. In Purbeck the allocation, and safeguarding, of employment land at Dorset Innovation Park (to the west of Wool) and Holton Heath is recognised in the LEP's strategic economic plan as significant in unlocking growth in Purbeck and the surrounding areas.
8. *Allocating land for retail needs, and encouraging retail development at key housing sites that will support sustainable patterns of development in Purbeck* - Purbeck District Council and Borough of Poole constructively worked together on analysing and identifying the needs for retail/leisure development in the 'Poole and Purbeck Town Centres, Retail and Leisure Study Final Report, November 2014'. This evidence

allowed the councils to prepare appropriate strategies relating to town centres, and allocations for retail development, in the adopted Poole Local Plan (November 2018), Swanage Local Plan (2017) and the submission draft Purbeck Local Plan (2018-2034).

9. *Conserving the natural environment* – the Boroughs of Bournemouth, Christchurch and Poole and the District Councils of East Dorset and Purbeck have worked actively and constructively to develop planning frameworks to avoid/mitigate the adverse effects of development on Dorset Heathlands through the Dorset Heathlands Planning Framework 2015 to 2020 Supplementary Planning Document. The Borough of Poole, North Dorset District Council¹, Purbeck District Council and West Dorset District Council have also worked jointly to develop a planning framework to avoid/mitigate the effects of nitrogen emissions and recreational pressures, connected with further development, on Poole Harbour through the Nitrogen Reduction in Poole Harbour Supplementary Planning Document 2017. Borough of Poole and Purbeck District Council have also worked jointly on preparing The Poole Harbour Recreation Planning Framework 2019-2034 Supplementary Planning Document Consultation Draft (published for consultation between February and March 2019). Ongoing monitoring of the effectiveness of avoidance/mitigation and measures allows councils to review and update the jointly prepared planning frameworks.

Question 3

Does the Council's Duty to Co-operate Compliance Statement [SD09] and the Statement of Common Ground (SoCG) [SD10a] demonstrate that the duty to co-operate has been met?

10. Yes - SD09 and SD10a demonstrate that the Council has engaged actively (as a member of the Strategic Planning Forum) and on an ongoing basis to constructively address strategic cross boundary matters by:
- jointly preparing evidence which relates to at least two planning areas to inform strategies and policies (relating to housing, gypsies, travellers and travelling showpeople, employment and retail/leisure) in their local plans; and
 - jointly preparing supplementary planning documents (relating to Dorset Heathlands and Poole Harbour) to avoid/mitigate the adverse effects of development on European sites which form part of network extending over two planning areas or which overlap two planning areas.

Question 4

In relation to housing, the Purbeck Local Plan states that it is seeking to meet the housing need for the area it covers in full. The SoCG [SD10a] indicates that at present the extent to which other areas in Dorset can meet their own needs is not fully understood, as the work on assessing potential development options in each area is at different stages. It indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs (Table 4 page 11) and that should this

¹ North Dorset District Council did not adopt the Nitrogen Reduction SPD as they have not implemented the Community Infrastructure Levy.

prove to be the case the local planning authorities are committed to work together to assess the potential for some or all of this need to be met within other authorities' areas and that this work will need to be informed by an appraisal of all reasonable options for the distribution of growth across Dorset, taking account of issues such as land availability, infrastructure capacity and development constraints.

The SoCG [SD10a] also indicates that in relation to local authority areas adjoining Dorset the principal issue of unmet housing need is likely to arise from New Forest District.

What are the implications of the above when considering whether or not the Council has met the duty to co-operate?

11. The Council has pro-actively sought co-operation with neighbouring councils on strategic housing matters on an ongoing basis. This engagement has necessarily been based on the information provided by other councils on their housing requirements, their ability to address these requirements and in Purbeck's case in progressing the Purbeck Local Plan to the submission stage has focused on those surrounding councils with shared boundaries (including the (former) district councils of: East Dorset, North Dorset and West Dorset, and Borough of Poole Council).
12. While the Dorset councils have not reached agreement over the distribution of any unmet housing need from Bournemouth or Christchurch areas the Dorset SPF provides the mechanism for constructive and effective future co-operation once the extent of any un-met need has been precisely quantified. Therefore, the Council considers that it would be most appropriate for this co-operation to take place as part of the preparation of local plans for the newly formed unitary authorities: Dorset Council and Bournemouth, Christchurch and Poole Council, which share common administrative boundaries.
13. The published evidence at the time of preparing the Purbeck Local Plan indicates that there is no un-met housing need in New Forest District. New Forest District Council submitted a local plan for examination in November 2018, stating that the submitted local plan addresses local housing need (as defined in the JGC Objectively Assessed Housing Need Study, 2017) of 10,500 new homes in full through: existing commitments, strategic housing site allocations in the emerging plan, rural exceptions sites for affordable homes and committing to prepare Local Plan Part Two to identify sites for a further 800 new homes ('Policy 5: Meeting our housing needs', Local Plan Review 2016 – 2036 Part One: Planning Strategy, submission document for regulation 19 public consultation, 29th June 2018 – 12th August 2018, New Forest District outside the New Forest National Park).
14. Assuming that this local plan is adopted, there is likely to be a need for work on reviewing the plan's strategic housing policies to begin promptly in response to updated housing requirements calculated using the government's latest methodology. The review is likely to coincide with the preparation of local plans in the newly formed Dorset unitary authorities which share boundaries with New Forest District Council. This provides an opportunity for councils to effectively co-operate in addressing any un-met housing need.

Issue 2: Local Development Scheme

Question 1

Has the Plan been prepared in accordance with the Local Development Scheme (LDS) (February 2018 [SD11], including in terms of timing and content?

15. *Timings for preparation of the Purbeck Local Plan* - Timings on the consultation, publication and submission of the local plan correspond with the schedule presented in Appendix 1 of the Local Development Scheme [SD11]. Consultation to inform the preparation of the Purbeck Local Plan (2018-2034) took place between 29th January and 12th March 2018 (SD06d –New homes for Purbeck consultation report 2018). The pre-submission draft Purbeck Local Plan (2018-2034), submission documents and supporting evidence were published for six weeks on the 22nd October 2018 (the publication period ended on 3rd December 2018). The Council submitted The Purbeck Local Plan (2018-2034) for examination on 28th January 2019.
16. *Content of the Purbeck Local Plan* – Paragraph 4 of the Council’s Local Development Scheme [SD11] sets out that the Purbeck Local Plan Review will “explore the potential for an appropriate level of additional housing growth” as compared to that set out in the adopted Purbeck Local Plan Part 1. It states that the plan will include detailed site allocations, and will include a review of settlement boundaries, employment sites, retail needs, heathland mitigation and town and local centres. The Council has considered all these issues during the preparation of the Local Plan, as evidenced by the submitted plan [SD01a], and the consultation documents which helped inform this plan (2015 Issues and Options consultation², 2016 Options consultation³, and 2018 New homes for Purbeck consultation⁴). The Council has taken account of the responses and evidence presented in earlier consultations when preparing the development strategies and policies relating to these matters in the Purbeck Local Plan (2018-2034).

² Issues and Options Consultation document (2015) Available from: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/consultations/issues-and-options/reviewing-the-plan-for-purbecks-future-issues-and-options-consultation-document.pdf>

³ Options consultation document (2016) Available from: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/consultations/options/options-consultation-document-2016.pdf>

⁴ New Homes for Purbeck consultation document (2018) Available from: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/consultations/new-homes-for-purbeck-consultation-document-january-2018.pdf>

Issue 3: Public Consultation

Question 1

Has consultation on the Plan been carried out in accordance with the Council's Statement of Community Involvement [SD05] and the requirements of the 2004 Act and the 2012 Regulations?

17. Yes. The Council's Regulation 22 Consultation Statement [SD07] describes:
- a) earlier Regulation 18 consultations (that took place in 2015 between 29th January and 13th March, 2016 between 9th June and 12th August and 2018 between 29th January and 12th March); and
 - b) Regulation 19 publication period (that also took place in 2018 between 22nd October and 3rd December 2018).
18. Copies of/descriptions of the notifications, for the Regulation 18 consultation, that were drafted and then sent to relevant people/consultation bodies are presented or described in:
- a) Appendix 3 of SD06a - Regulation 18 consultation 2015;
 - b) Paragraphs 13 to 20 of SD06b - Regulation 18 consultation 2016; and
 - c) Appendix 1 and 2 of SD06d - Regulation 18 consultation 2018.
19. In accordance with the Statement of Community Involvement, notice of the consultations were publicised in local newspapers, online (using social media and the Council's website), at drop-in events, on posters and (in the case of the Regulation 18 consultations) in leaflets sent to householders (as summarised in paragraphs 19 to 21, 29 to 37, 52 to 56 and 74 to 77 of the Council's Regulation 22 consultation statement – SD07).
20. The 6 to 9 week consultation and publication periods which the Council undertook are consistent, or exceed, the requirements in the Statement of Community Involvement and the Regulations. In accordance with the regulations the Council has notified: relevant general and specific consultation bodies (as listed Appendix 8 – SD07) and residents/other persons carrying on a business in the Council area. This included:
- a) specific consultation bodies that it considered may have an interest in the new local plan (including: parish councils within the District, neighbouring district/borough councils, Dorset County Council, Natural England, Historic England and the Environment Agency);
 - b) general consultation bodies which it considered were appropriate (including: local health care providers, Sport England, Woodland Trust, Police, Ministry of Defence and providers of social housing); and
 - c) residents / people carrying on a business in the local plan area which it considered were appropriate (including: notifying every household in the District and all

households in the neighbouring village of Crossways formerly within West Dorset District Council).

21. A copy of the statement of representations procedure for the pre-submission Purbeck Local Plan is presented in Appendix 1 of the Council's Regulation 22 consultation statement [SD07]. Appendix 4 of the consultation statement [SD07] includes a table which identifies where the Council made pre-submission documents available for public inspection between 22 October and 3 December 2018. The Council also made a statement describing the procedure for making a response on the local plan available in accordance with the requirements of the regulations. The representation procedure was also published on the Council's website 'Dorset for You'.
22. Consultation reports [SD06a, SD06b, SD06c and SD06d] and the Council's Regulation 22 consultation statement [SD07] describe the key issues and matters raised in Regulation 18 consultations and how the Council took these issues and matters into consideration when preparing its local plan. Copies of the representations made in accordance with Regulation 20 were submitted with the Council's local plan.

Question 2

Were adequate opportunities made available for participants to access and make comments on the Local Plan and other relevant documents?

23. Yes. At each stage of the Purbeck Local Plan preparation the Council made documents available electronically on its website as well as physically at the locations described in Appendix 4 of its Regulation 22 consultation statement [SD07]. The Council has accepted and taken account of responses which were made both electronically (through the portals that were created for the consultation and/or e-mails) and in writing.
24. The Council organised and widely advertised in advance drop in events (at selected locations across the Purbeck area) at key points throughout the preparation of its local plan. During these events officers informally responded to questions relating to published evidence and emerging planning policies. These events also allowed officers to support people in engaging in the plan making process by explaining how the local plan is being prepared, next steps and how to make a response. This included publication stage when, in a response to a specific request to do so, the Council attended a session held in November 2018 arranged to assist people living in Wool in making responses on the local plan (paragraph 74 Regulation 22 consultation statement SD07 refers).
25. The total number of responses received (over 3,300 responses to the 2016 Regulation 18 consultation, 6,762 households (28% response rate) responded to the 2018 Regulation 18 consultation and 195 responses to the pre-submission publication draft plan) over the consultation/publication of the draft local plan is evidence demonstrating that the Council has successfully engaged with the local community.

Question 3

Were representations adequately considered?

26. Yes. The Council has prepared detailed and comprehensive reports which summarise the planning matters and issues raised during each of the Regulation 18 consultations [SD06a – d and SD07]. The Council has continuously adjusted its approach to the process of gathering and reviewing evidence, and drafting strategies and planning policies for its local plan, to take account of relevant responses made in the course of the consultations in addition to informal guidance provided by third parties. For example:
- a) In response to representations relating to the area's housing requirements, and the way the Council calculated these requirements, the Council sought an updated Strategic Housing Market Assessment (SHMA) in response to representations received during the 2016 Regulation 18 consultation and a 'critical friend' review conducted by the Planning Advisory Service in 2016⁵. The updated SHMA was published as part of the 2018 Regulation 18 consultation.
 - b) In response to representations received during the 2016 Regulation 18 consultation, which related to the identification and selection of suitable land to meet the area's needs and conserve and enhance its natural environment, the Council prepared a district wide 'environmental capacity and infrastructure study'. The study was also published in support of the 2018 Regulation 18 consultation, and has been used by the Council in the preparation of the alternative development strategies presented in the 2018 'New homes for Purbeck' consultation and the appropriate strategy that has been selected for its plan [SD16].
 - c) The Council took account of householders' preferences (expressed in responses to the 2018 Regulation 18 consultation) on a strategy for meeting the area's housing requirements. The housing strategy that the Council has selected for its local plan broadly reflects the option which received the greatest level of acceptance during the consultation.
 - d) In response to representations concerning its housing development strategy (and the inclusion of green belt sites within this strategy) the Council has reviewed and updated evidence relating to the green belt land in Purbeck (SD24 and 51).
 - e) In response to representations relating to the effectiveness of its plan the Council has prepared and reviewed assessment on the viability of development being considered as part of the strategies in its emerging local plan throughout the consultation/ publication processes (SD31 – 37).
 - f) The Council considered whether there were likely to be exceptional circumstances for major development (including new homes) at selected sites in the Dorset Area of Outstanding Natural Beauty. Its assessments were published in a background

⁵ The Planning Advisory Service Review report can be accessed via: www.dorsetcouncil.gov.uk/purbeck-local-plan-consultations

paper during the 2018 Regulation 18 consultation (this evidence has not been submitted for examination as it relates to 'omission sites').

- g) In response to representations relating to the accuracy of the information in its Strategic Flood Risk Assessment, the Council prepared and published an updated assessment (which takes account of updated evidence and current planning guidance) for the 2018 Regulation 18 consultation. It ensured that this updated information was taken into consideration when assessing the suitability of land made available for development.
- h) In response to representations relating to second homes, and their social/economic effects on local communities, the Council gathered evidence [SD23] and prepared a bespoke second homes policy (H14) for inclusion in its local plan.

Issue 4: Sustainability Appraisal

Question 1

Has the Plan been subject to an appropriate Sustainability Appraisal (SA) as required by section 19(5) of the 2004 Act having regard to the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance?

27. Yes. A Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) has been prepared and is compliant with the European Directive 2001/42/EC and paragraph 32 of the National Planning Policy Framework 2019.
28. The iterative SA/SEA was prepared alongside the development of the Purbeck Local Plan 2018-2034 comprising of; an SA/SEA scoping report in 2013⁶, SA/SEA report for the Issues and Options consultation in 2015⁷, SA/SEA report for the options consultation in 2016 [SD50], SA/SEA report for the options for the New Homes for Purbeck consultation 2018 [SD52], and SA/SEA report assessing the suitability of the proposals in the draft plan [SD02].

Question 2

Have the likely environmental, social and economic effects of the Plan been adequately assessed?

29. Yes. All options and their reasonable alternatives were assessed against SA objectives that encompass the likely environmental, social and economic effects of the plan. The SA objectives are as follows:
- Meet as much of Purbeck's housing need as possible;
 - Promote services and facilities where need is identified;
 - Harness the economic potential of tourism and widen employment opportunities in Purbeck;
 - Help everyone access basic services, reduce the need to travel by car and encourage cycling, walking and use of public transport;
 - Reduce vulnerability to flooding and coastal change, and adapt to climatic changes;
 - Protect and enhance habitats and species and local geodiversity;
 - Protect and enhance Purbeck's unique landscape and townscape and cultural and historical assets; and lastly

⁶ Sustainability Appraisal scoping report (2013). Available from: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/evidence-library/pdfs/purbeck-sa-scoping-for-partial-review-2013.pdf>

⁷ Sustainability Appraisal report (2015). Available from: www.dorsetcouncil.gov.uk/purbeck-local-plan-consultations

- Minimise all forms of pollution and consumption of natural resources.
30. Sustainability strengths and weaknesses, secondary, cumulative and synergistic effects and short, medium and long term effects were considered for each proposal during the iterations of the SA.

Question 3

Has the submitted Plan been tested against all reasonable alternatives where these exist, such as different options for the spatial strategy including the removal of land from the Green Belt and the distribution of development, particularly housing development?

31. Yes. All reasonable alternatives, where they exist, (and conceivably would have a realistic prospect of delivery during the plan period) have been tested. Appendix 1 shows details of the options assessed.
32. The Purbeck Local Plan Policy V1 focusses on housing delivery as one of the most pertinent issues the plan must address for the area. Extensive exploration of the possible options for the delivery of this housing has involved assessments ranging from releasing green belt for development, using small sites in the AONB to focussing development on larger sites in the less constrained areas of the district.
33. Appendix 1 provides detail of what was assessed at which stage, but to summarise, the following strategies were assessed during the preparation of the plan:
- disperse housing in accordance with the settlement hierarchy;
 - focus housing on larger sites within the green belt;
 - focus housing on larger sites in less constrained areas, avoiding housing in the green belt or AONB;
 - release of varying amounts of green belt for housing;
 - delivery of housing in the AONB; and
 - delivery of varying amounts of housing through neighbourhood plans.
34. The Council acknowledges there are other options for development but in light of evidence and national policy, considers them to be unreasonable alternatives and therefore they have not been assessed in any level of detail. Below is a list of these options and an explanation of why they were not considered to be reasonable alternatives:
- **Spread development as much as possible (e.g. through a proportionate increase in the size of each settlement):** This option would not be deliverable due to constraints and land availability.
 - **Focus development at a new settlement (Bere Farm):** This option would involve release of a significant amount of green belt land. This is likely to be unjustifiable as

other options exist. There are also concerns about the deliverability / viability of this option as all facilities and supporting infrastructure would need to be provided on site.

- **Use land at Holton Heath to provide all the required housing:** This option has not been considered as the harm to protected species that development here would cause is unable to be mitigated for.
- **Provide approximately 650 new homes at Lytchett Minster:** This option was considered as part of the SA report for the 2015 issues and options consultation. This option is no longer considered to be a reasonable alternative in light of the reduction in the overall housing need for the district, and the Government's statements about green belt in the Housing White Paper. Having reviewed the evidence, the Council has concluded that there are no exceptional circumstances to alter green belt boundaries in this area. There is also evidence of flood risk exacerbated by the A35 causeway.
- **Provide approximately 500 homes at West of Wareham:** This option was considered as part of the SA report for the 2015 issues and options consultation. This option is no longer considered to be a reasonable alternative in light of the reduction in the overall housing need for the district. The site is entirely located within the AONB, and other sites are available to provide for the district's housing need outside the AONB.

Issue 5: Habitats Regulations

Question 1

Is the Plan legally compliant with respect to the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations)?

36. The plan is legally compliant with respect to the Conservation of Habitats and Species Regulations 2010 (as amended) (Habitats Regulations).
37. The Habitats Regulations Assessment (HRA) has been updated as the plan has developed from the Issues and Options stage in 2015, Preferred Options in 2016, the New Homes for Purbeck specific housing consultation in 2018 and through to Pre-Submission in late 2018 (see SD03 for the pre-submission HRA report).
38. The current Purbeck Local Plan has a range of mitigation measures embedded within policy, which protect the European sites. A number of strategic level mitigation schemes have been developed, providing a robust mechanism to ensure that development does not adversely affect the European sites, primarily focussed on the Dorset Heathlands and Poole Harbour.
39. The latest HRA [SD03] has assessed the implications for European sites of the Pre-submission Local Plan document at both screening for likely significant effects and appropriate assessment stage. The screening for likely significant effects screened all housing and employment allocations as likely to have a significant effect on European sites due to their proximity to the sites and the need for effective mitigation in line with the established strategic approaches for the heaths and Poole Harbour. The appropriate assessment sections have concluded that the mitigation adequately provides protection of the European sites, but that there remain some risks that should be resolved at the development project HRA level, in relation to preventing impacts in close proximity to European sites, particularly in relation to employment sites (see further explanation in response to Question 2 below). The HRA report concludes that “the Pre-submission version of the Purbeck Local Plan is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects on European site integrity can be drawn” (paragraph 8.7 of SD03).
40. The Council as Competent Authority in accordance with the Conservation and Species Act (2017) has undertaken Habitats Regulations Assessment of the pre-submission draft Purbeck Local Plan (2018-2034) and will publish a statement that subject to mitigation measures included in the Purbeck Local Plan (2018-34), no significant adverse effects are likely upon the integrity of internationally and European protected sites, as part of the adoption statement.

Question 2

Is the Habitats Regulation Appropriate Assessment included within the Habitats Regulation Assessment (HRA) [SD03] sufficiently robust at a plan level?

41. Yes, the HRA Appropriate Assessment is sufficiently robust at plan level.

42. The HRA highlights that for the housing sites, it is anticipated that adherence to the strategic mitigation approaches will provide adequate protection for the European sites, but it will be important for site specific considerations to be taken into account for each mitigation package.
43. SANGs provision is critical to securing the necessary mitigation to prevent adverse effects on the European sites in terms of recreation pressure. Natural England has been advising the Council since those proposals were published in 2016, and there is now a good level of progression with SANGS to be able to conclude that the allocations have viable options for SANGS mitigation.
44. The Council continues to jointly fund Strategic Access Management and Monitoring with appropriate neighbouring authorities to influence behaviour on Dorset Heathlands and ensure the mitigation is effective.
45. There are identified uncertainties and need for development project level HRA in relation to some employment sites. The HRA identifies risks from the proximity and/or particular uses on existing employment allocations, proposed new employment allocations and conversions for employment use. The potential risks from additional capacity considered at Corfe Castle and Sandford Lane have been removed as the sites were surplus to capacity and removed from the submission version of the plan. Natural England has been working with the promoter/developer for both larger existing allocated sites to put in place measures to minimise, mitigate and enhance the heathlands in their localities. The HRA states that progression of these previously agreed employment allocations can be undertaken without adverse effects on the nearby Dorset Heathlands and project level HRA should secure any detailed mitigation measures.
46. At the plan level, it is concluded that adverse effects on European sites can be prevented with adequate safeguards at the project level.

Question 3

The conclusions of the HRA [SD03] indicates that the implications for European sites of the Pre-submission Local Plan have been assessed at both screening for likely significant effects and appropriate assessment stages. It indicates that the screening for likely significant effects screened all housing and employment allocations as likely to have a significant effect on European sites due to their proximity to the sites and the need for effective mitigation in line with the established strategic approaches for the Heaths and Poole Harbour. It also indicates that the appropriate assessment sections conclude that the mitigation adequately provides protection of the European sites but that there remain some risks that should be resolved at the development project HRA level in relation to preventing impacts in close proximity to European sites, particularly in relation to employment sites.

The Council is asked to confirm whether or not Natural England has indicated that it is content with the approach set out above and the overall conclusions and recommendations of the HRA?

47. Natural England has worked positively with the Council over a number of years advising on the various iterations of the plan and the HRA. The Council's consultants, Footprint Ecology, who carried out the HRA consulted Natural England at each iteration of the document to ensure it was content with the finding and conclusions. Natural England has written to the Council (copy included at appendix 2) to confirm that it "concur with the HRA conclusions set out at 8.7 that the Local Plan is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects on European site integrity can be drawn". Natural England has also made some detailed comments on the HRA, which are included at appendix 2.

Issue 6: Other Legal and Procedural Requirements

Question 1

The Purbeck Local Plan was submitted for examination on 28 January 2019. What are the implications, if any, for the Plan of the February 2019 revisions to the Framework and PPG resulting from the Government response to the Technical Consultation on updates to national planning policy and guidance?

48. The Council does not consider that the February 2019 changes to national planning policy and guidance have any significant implications for the Purbeck Local Plan. The revisions included confirmation that 2014-based household projections should be used to provide the demographic baseline when applying the standard method for calculating housing need. The Purbeck Local Plan provides for an identified local housing need of 168 homes per year. This local housing need was calculated using 2014-based household projections, as set out in the Strategic Housing Market Assessment (SHMA) Update for Purbeck [SD20]. As such, the Council considers that the calculation of the local housing need is in line with updated planning guidance.
49. Minor updates have also been made to national planning policy in relation to housing land supply, the definition of deliverable sites, and appropriate assessment for habitats sites. The Council has taken account of these updates on housing land supply and the definition of deliverable sites in its updated five year housing land supply assessment for Purbeck (now published and submitted as part of the examination SD38a).
50. The change in national policy in relation to habitats sites clarifies those circumstances where the presumption of sustainable development does not apply, and this does not have any implications for the Purbeck Local Plan.

Question 2

The Local Plan indicates that all its policies are strategic. Is this justified and consistent with national policy?

51. Yes. After taking account of the character (natural and built), the challenges and issues around meeting its requirements for homes/infrastructure and needs of existing and new businesses, the Council is satisfied that all of the policies in its local plan are necessary to in order to:
 - i. address strategic priorities for the area (including land use planning matters that extend across administrative boundaries); and
 - ii. provide a clear starting point for non-strategic policies that are needed⁸.
52. The Council's vision and objectives summarise the key land use planning issues/matters that the local plan has been prepared to address. These include objectives relating to:

⁸ NPPF para 28 advises that non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development. It then gives examples of what these policies might include.

- a) environment;
 - b) housing;
 - c) economy; and
 - d) infrastructure.
53. The spatial strategy (Policy V1), green belt policy (Policy V2) and all of the planning policies in the environment, housing, economy, infrastructure and implementation chapters of the Council's local plan either: address one or more key priorities, look ahead over 15 years, are an integral part of a planned strategy over the plan's lifetime or make a significant contribution towards meeting one of the Council's overall objectives.
54. The policies in the 'environment' chapter individually, and in some instances collectively, contribute to the strategic objectives of: conserving the area's natural environment, securing development/land uses that will contribute toward mitigating and adapting to the effects of climate change across the area and contributing toward achieving high quality/sustainable design across the area.
55. The policies in the 'housing' chapter also form a central part of the Council's overall strategy by: setting out a pattern and scale of new homes across the area to meet its housing needs, bringing land forward for housing at a sufficient rate, providing a framework for delivering the types of residential development needed in the area, delivering high quality development across the area and seeking to address social issues arising from availability and cost of new homes across the area.
56. The policies in the 'economy' chapter similarly form a central part of the Council's overall strategy by: setting out a pattern and scale of employment/retail/leisure/tourism uses across the area. The policies in the 'infrastructure' chapter outline the Council's approach to delivering the infrastructure needed to support the development in its strategies. These infrastructure requirements (including: the need for affordable homes, conservation of protected habitats, transport infrastructure, green infrastructure, education infrastructure, community facilities/services and health infrastructure) relate to development across the area.
57. The strategic policies in the Council's local plan provide a clear starting point for the 'more detailed'⁹ non-strategic policies included in, for example, neighbourhood plans. The Council has collaborated with local communities in Arne, Bere Regis, Lytchett Matravers, Wareham, and Wool on their neighbourhood plans. These emerging and adopted plans include detailed policies which reflect key local issues and the locally distinctive characteristics of these areas.

⁹ NPPF para 28 refers

Question 3

Does the Local Plan propose any policy that will supersede a policy in a made neighbourhood plan? If so has this been clearly identified?

58. No. At the time of submitting the local plan there was a single made neighbourhood plan for Lytchett Matravers (13th June 2017) (<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/neighbourhood-planning-purbeck/neighbourhood-planning-purbeck.aspx>). The neighbourhood plan includes development management policies relating to:
- a) Development principles/vision/objectives – Policy 1;
 - b) Local design principles – Policy 2;
 - c) Design of estate roads – Policy 3;
 - d) Green infrastructure with new development – Policy 4;
 - e) Encouraging employment uses/safeguarding employment development – Policies 5 and 6;
 - f) Shopping facilities – Policy 7.
59. The policies in the respective plans are consistent with one another and therefore complementary.

Question 4

Is the Local Plan in compliance with section 19(1A) of the Planning and Compulsory Purchase Act 2004 which requires development plan documents (taken as a whole) to include policies designed to secure the development and use of land in a local planning authority's area to contribute to the mitigation of, and adaptation to, climate change?

60. Yes. The Council's approach to securing mitigation of, and adaptation to the effects of, climate change is summarised in paragraph 63 to 67 of the local plan.
61. The policies in the local plan relating to: flood risk (Policy E4), sustainable drainage systems (Policy E5), coastal change management areas (Policy E6) and housing development (Policies H3, H4, H5, H6 and H7) all contribute towards securing adaptations through development/land uses to the impacts of climate change. For example:
- a) *Avoiding development in inappropriate locations which are, or are likely to be risk from the impacts of climate change* - When applied with the data presented in the Council's Strategic Flood Risk Assessment, and published shoreline management plans, policies E4 and E6 support the requirements in national planning policy to avoid inappropriate development on land that is likely to be at risk from flooding/coastal change (taking account of the potential impacts of climate change

on these risks). Policy E6 makes an allowance for re-location of development, to a more suitable location, which may be threatened by coastal change.

- b) *Securing high quality design to ensure that development does not contribute to the adverse impacts of climate change* - The requirement for sustainable drainage systems in Policy E5 (for development identified a. – c.) is likely to contribute towards reducing the risks from flooding by ensuring that surface water run-off from development sites is controlled to mimic natural drainage as closely as possible.
- c) *Providing green infrastructure as part of new development* - The Council's housing policies for allocations at Moreton Station/Redbridge Pit, Lytchett Matravers, Upton and Wool (Policies H3, H4, H5, H6 and H7) require delivery of green infrastructure (in the form of Suitable Alternative Natural Green Spaces and suitably designed green spaces following the Fields in Trust Guidelines) – this infrastructure will help communities adapt to the impacts of climate change by managing drainage on the sites and safeguarding land for flood risk management purposes. (The indicative layouts prepared by the planning agents for the housing sites in Lytchett Matravers, Upton and Wool all identify undeveloped green spaces for this purpose). The Council's green infrastructure policy (Policy I3) also requires new development to ensure that future green space is planned for.

62. The policies in the local plan relating to: spatial strategy (Policy V1), renewable energy (Policy E3), design (Policy E12), housing (Policies H3, H4, H5, H6 and H7) and improving accessibility and transport (Policy I2) will all contribute towards mitigating the effects of climate change through securing appropriate land use and development. For example:

- a) *Providing the opportunity to reduce carbon emissions through sustainable travel* - The Council's spatial strategy encourages a sustainable pattern of housing development across Purbeck by allocating land for new homes in Moreton Station/Redbridge Pit and Wool. Occupants of homes in these locations will have the opportunity of rail travel rather than private motor vehicles.
- b) *Reducing carbon emissions through sustainable construction* – The Council's design policy (E12) encourages high quality design which is energy efficient.
- c) *Encouraging the use and supply of renewable and low carbon energy* - The Council's renewable energy policy (Policy E3) and design policy supports development that will supply renewable and low carbon energy provided that any adverse impacts can be satisfactorily addressed.

Question 5

Several policies of the Local Plan refer to a Supplementary Planning Document or other standalone document thereby apparently seeking to give development plan status to documents which have not been subject to the same process of preparation, consultation and Examination. Would this comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations)?

63. A number of policies in the Local Plan include references to Supplementary Planning Documents and other documents where these will help aid and guide the interpretation of the policies. These references are summarised in table 1 (overleaf).
64. The Council accepts that the other documents referred to in some of its planning policies do not have the form or content of a development plan and therefore cannot be accorded development plan status (as prescribed in Parts 4 and 5 of The Town and Country Planning (Local Planning) (England) Regulations 2012). As shown in table 1, the policy references to other documents use wording such as “in accordance with”; “as defined in the SPD”; “following ... guidelines”; “generally expect”; and “in line with”. It is the Council’s view that these references to other documents are appropriate, and are a useful aid to decision makers, to guide the interpretation of the relevant policies.

Policy	Reference to other document (emphasis added)
E7: Conservation of protected sites	“The Council will determine applications adversely affecting these sites <i>in accordance with</i> the recommendation of the relevant assessments under the Habitats Regulations and Supplementary Planning Documents as appropriate”.
E8: Dorset heathlands	“b. between 400 metres and 5km of heathland such development will provide mitigation <i>in accordance with</i> the advice set out in the Dorset Heathlands Supplementary Planning Framework 2015-2020 SPD or appropriate to the adverse effects identified”.
E9: Poole Harbour	<p>“Nitrogen neutrality Development proposals for any net increase in homes, tourist accommodation or a tourist attraction, will provide mitigation <i>in accordance with</i> the advice set out in The Nitrogen Reduction in Poole Harbour SPD, if the sewerage drains into the Poole Harbour catchment.</p> <p>Recreational effects The Council is working with the Borough of Poole to develop a Recreation in Poole Harbour SPD. Development proposals for any net increase in homes, tourist accommodation or a tourist attraction around the edges of the harbour (<i>as defined in the SPD</i>) will need to avoid or mitigate adverse impacts arising from recreational activity on Poole Harbour”.</p>
H3: New housing development requirements	<p>“c. deliver appropriately designed suitable alternative natural greenspaces (SANGs) to avoid / mitigate the adverse effects from the new homes on European sites (<i>in accordance with</i> The Dorset Heathlands Planning Framework 2015-2020 Supplementary Planning Document, 2016), provide details for phased implementation of development / access to the SANG and details of site access management and monitoring to demonstrate that adverse effects can be avoided / mitigated over the lifetime of the development;</p> <p>d. mitigate the effects of nitrogen from the new homes on Poole Harbour (<i>in accordance with</i> the Nitrogen Reduction in Poole Harbour Supplementary Planning Document, 2017); [...]</p> <p>f. provide suitably designed green space <i>following the</i> Fields in Trust 'Guidance for Outdoor Sport and Play Beyond the Six Acre Standard England”.</p>
H9: Housing mix	“In order to achieve mixed and balanced communities, the Council will <i>generally expect</i> new market housing to support delivery of the household requirements identified through the Strategic Housing Market Assessment”.
I2: Improving accessibility and transport	“i. provide for adequate parking levels <i>in line with</i> the Bournemouth, Poole and Dorset Residential Car Parking Strategy, and non-residential parking guidelines”.
I4: Recreation, sport and open space	“Residential development will be required to make provision for formal and informal recreation, sport and/or open space facilities on-site to achieve the identified <i>following</i> Fields in Trust benchmark guidelines ¹⁰ ”.

Table 1: Policy references to other documents

¹⁰ The extract from Policy I4 is shown including the possible change (MM17) identified in the Schedule of possible modifications [SD14].

Question 6

(a) Having regard to the provisions of the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008, when is the wider plan for the new unitary authority, within which the area covered by the Purbeck Local Plan falls, intended to be brought forward? (b) What, if any, are the implications of this for the examination of the Purbeck Local Plan and should the Purbeck Local Plan explain this?

65. *Time table for preparing a new local plan for Dorset Council* - Local councils in Dorset re-organised on the 1st April 2019. Regulation 19(4) of the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008 requires newly formed councils to adopt a new local (which applies to the whole of the new council area) within a period of five years commencing from the re-organisation date. The shadow executive for Dorset Council resolved on 11th February 2019 to adopt a new local plan before 1st April 2023¹¹ to avoid any overlap between local government elections and consultation/adoption of the Council's new local plan. Officers at Dorset Council are therefore currently preparing a local development scheme for its new local plan that meets this timetable. The local development scheme is scheduled to be considered by Dorset Council's Cabinet at a meeting on the 25th June 2019.
66. *Implications of a new local plan for Dorset Council for the Purbeck Local Plan* - National policy (paragraph 33 of National Planning Policy Framework, 2019) outlines councils' responsibilities to regularly review their plans taking account of changes in planning policy and local circumstance. The Council will need to consider which strategies and policies from Purbeck Local Plan (2018-2034) are taken forward into the Dorset Council Plan as part of its responsibilities for maintaining up-to-date local planning policies and to reflect changes in local circumstances. The Council does not consider that it needs to explicitly refer to this process as the requirement to review local planning policy is described in national policy.

¹¹ The report (<https://moderngov.dorsetcouncil.gov.uk/documents/s2677/local-plan-shadow-executive-report.pdf>) and shadow executive's decision (<https://moderngov.dorsetcouncil.gov.uk/ieListDocuments.aspx?CId=136&MIId=130&Ver=4>) are published on Dorset Council's website.

Appendix 1: Sustainability appraisal consideration of alternatives

Matter A: Legal Compliance and Procedural Requirements

Policy	Assessed in SA	Alternatives Assessed	Reasoning
<p>Policy V1: Spatial Strategy for sustainable communities</p>	<p>Issues and Options 2015</p>	<p>Issue 1: length of plan period:</p> <ul style="list-style-type: none"> • 2017-2031 (14 years); and • more than 14 years <p>Issue 3: where should the Council focus new settlement extensions:</p> <ul style="list-style-type: none"> • disperse proportionately in line with existing Policy LD; • disperse settlement extensions around the towns (Swanage, Upton and Wareham); • disperse settlement extensions around the key service villages (Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford and Wool); • disperse settlement extensions around the local service villages (Langton Matravers, Stoborough, West Lulworth and Winfrith Newburgh); • disperse settlement extensions around other villages with a settlement boundary (Briantspuddle, Chaldon Herring, Church Knowle, East Burton, East Lulworth, Harmans Cross, Kimmeridge, Kingston, Lytchett Minster, Moreton Station, Studland, Ridge and Worth Matravers); and 	<p>A wide range of possible reasonable alternative options were considered throughout the SA process.</p> <p>The following options were considered unreasonable alternatives and were not assessed:</p> <p>West Lulworth Neighbourhood Plan: West Lulworth Parish Council are no longer working towards producing a Neighbourhood Plan.</p> <p>Arne Neighbourhood Plan: Arne Parish is composed of constraints making it difficult for the Neighbourhood Planning group to allocate sites. Additionally they were drafting their final plan when the NPPF requirements changed and allowed for LPA's to delegate housing numbers to Neighbourhood Planning groups. To allocate the plan a housing figure would have considerably hampered their progress.</p> <p>Possible Alternative Option: Set out the scope for suitable settlement boundaries to be 'rounded off' thereby enabling some additional windfall development across the district.</p> <p>Possible alternative site: provide a new village to the south of Lytchett Minster.</p> <p>Spread development as much as possible (e.g. through a proportionate increase in the size of each settlement):</p> <p>This option would not be deliverable due to constraints and land availability</p>

Matter A: Legal Compliance and Procedural Requirements

		<ul style="list-style-type: none"> new criteria-based addition to Policy CO: Countryside to allow growth at other villages without a settlement boundary (Affpuddle, Bloxworth, Coombe Keynes, East Knighton, East Stoke, Holton Heath, Morden (East and West), Moreton, Organford and Worgret). 	<p>Focus development at a new settlement (Bere Farm): This option would involve release of a significant amount of greenbelt land. This is likely to be unjustifiable as other options exist. There are also concerns about the deliverability / viability of this option as all facilities would need to be provided on site.</p>
Options consultation 2016	<p>Preferred Option 1 – Partial Review to cover to 2033. Policy LD: direct development towards the most sustainable locations in the district, in accordance with a clearly defined hierarchy.</p> <p>Preferred Option 3: A new infrastructure led approach with a focus on sustainable locations, wherever possible.</p> <p>Alternative Option 2: Maximise housing in south-west Purbeck, with any shortfall of the housing target being met in line with Policy LD of the adopted Purbeck District Local Plan.</p> <p>Alternative Option 3: Maximise housing in north-east Purbeck, with any shortfall of the housing target being met in line with Policy LD of the adopted Purbeck District Local Plan.</p>	<p>Use land at Holton Heath to provide all the required housing: This option has not been considered as the harm to protected species that development here would cause is unable to be mitigated for.</p>	
New Homes for Purbeck 2018	<p>Bere Regis Neighbourhood Plan</p> <ul style="list-style-type: none"> Continue using PLP1 Policy NW: North west Purbeck. 		

Matter A: Legal Compliance and Procedural Requirements

		<ul style="list-style-type: none"> • Allocate development sites for around 105 units to Bere Regis Neighbourhood Plan • Allocate development sites for 218 units to Bere Regis Neighbourhood Plan. <p>Wareham Neighbourhood Plan</p> <ul style="list-style-type: none"> • Allocate Land in SHLAA sites 6/23/0166 and 6/23/1314 for around 200 homes in North Wareham to Wareham Neighbourhood Plan. • Allocate land in SHLAA sites 6/23/1314 and 6/23/0167 to Wareham Neighbourhood Plan. <p>Option A: proposed to spread development as much as possible by releasing areas of green belt for homes and providing houses in the less constrained west of the district. This option also included the use of smaller sites spread across the district.</p> <p>Option B: proposed to focus the majority of development on two main sites in the less constrained west of the district and included the use of smaller sites to meet the housing need.</p> <p>Option C: focussed development entirely on two main locations in the west of Purbeck.</p>	
	Pre-submission SA 2018	No.	All reasonable alternatives were assessed in previous iterations of the SA.

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Policy V2: Green belt	Issues and Options consultation 2015	Issue 5: green belt <ul style="list-style-type: none"> objectively reassess the boundaries to make sure that they follow logical boundaries on the ground and identify land that is suitable for release from the green belt for strategic development; objectively reassess the boundaries to make sure they are logical on the ground, but do not release land for strategic development; and no changes to the green belt and direct development towards non green belt locations. 	All reasonable alternatives were assessed.
	Pre-submission SA 2018	No.	All reasonable alternatives were assessed in previous iterations of the SA. The protection of the green belt is in accordance with the NPPF, for which there is no reasonable alternative.
Policy E1: Landscape	Pre-submission SA 2018	No.	Protection of landscapes, including the World Heritage Site, is in accordance with the NPPF. There is no reasonable alternative.
Policy E2: Historic Environment	Pre-submission SA 2018	No.	The conservation of the historic environment is in accordance with the NPPF. There is no reasonable alternative.
Policy E3: Renewable energy	Options consultation 2016	Policy REN: Renewable Energy from PLP1	No reasonable alternatives were assessed as it was considered the current policy was sufficient and was assessed as part of the development of PLP1.
	Pre-submission SA 2018	No.	This approach is in accordance with the NPPF for which there is no reasonable alternative.

Matter A: Legal Compliance and Procedural Requirements

Policy E4: Assessing flood risk	Options consultation 2016	Policy FR: Flood Risk from PLP1	No reasonable alternatives were assessed as it was considered the current policy was sufficient and was assessed as part of the development of PLP1.
	Pre- submission SA 2018	No.	There are no reasonable alternatives than to protect the district from potential flood risk.
Policy E5: Sustainable drainage systems	Options consultation 2016	Policy SuDs: Sustainable Drainage Systems: A new policy will set out the circumstances where particular sustainable drainage systems would not be appropriate.	The policy’s approach to incorporating SuDS is in accordance with the NPPF. There is no reasonable alternative.
	Pre- submission SA 2018	No.	
Policy E6: Coastal change management areas	Options consultation 2016	Policy CCMA: Coastal Change Management Areas A new policy will identify Coastal Change Management Areas (CCMAs) to take account of the predicted rates of shoreline change and make clear what development will be allowed in them.	This policy is in accordance with the NPPF. There is no reasonable alternative.
	Pre- submission SA 2018	No.	
Policy E7: Conservation of protected sites	Pre- submission SA 2018	No.	There are no reasonable alternatives than to protect internationally protected sites in accordance with national policy and legislation.

Matter A: Legal Compliance and Procedural Requirements

Policy E8: Dorset heathlands	Options consultation 2016	Preferred Option 6: Residential, tourist and some equestrian-related development will not be allowed within 400m of an internationally-protected heath but development will be allowed between 400m and 5km of a heath as long as impacts can be mitigated.	There are no reasonable alternatives than to use the Dorset Heathlands Supplementary Planning Framework 2015-2020 SPD which enables protection of internationally protected heathland in accordance with national policy and legislation.
	Pre-submission SA 2018	No.	
Policy E9: Poole harbour	Pre-submission SA 2018	No.	There are no reasonable alternatives than using the Nitrogen Reduction in Poole Harbour SPD and the soon to be adopted Recreation in Poole Harbour SPD to protect the internationally protected sites in Poole Harbour in accordance with national policy and legislation
Policy E10: Biodiversity and geodiversity	Pre-submission SA 2018	No.	This policy is in accordance with the NPPF. There is no reasonable alternative.
Policy E11: Development next to sewage treatment works and pumping stations	Pre-submission SA 2018	No.	The policy takes a proactive approach to protecting against pollution which is in accordance with the NPPF. There is no reasonable alternative.
Policy E12: design	Options consultation 2016	Policy D: Design from PLP1	No reasonable alternatives were assessed as it was considered the current policy was sufficient and was assessed as part of the development of PLP1.

Matter A: Legal Compliance and Procedural Requirements

	Pre-submission SA 2018	No.	This policy is in accordance with the NPPF. There is no reasonable alternative.
Policy H1: Local housing requirement	Issues and Options 2015	Issue 2: Meeting objectively assessed housing needs: <ul style="list-style-type: none"> • deliver around 2,244 additional homes between 2013 and 2031; and • deliver more than an additional 2,244 homes between 2013 and 2031 	<p>These options were considered the only reasonable options.</p> <p>The option to deliver more than the housing need was considered unreasonable as there is currently no evidence to suggest that a higher number of homes is needed in the District.</p>
	Options consultation 2016	<p>Preferred Option 2: deliver approximately 3080 additional new homes between 2013 and 2033 to meet the district's objectively assessed housing need.</p> <p>Alternative Option 1: deliver more than approximately 3080 additional new homes between 2013 and 2033 if unmet need is identified from a neighbouring council.</p>	<p>To deliver less than the housing need was considered unreasonable because this approach would not meet the requirements of the National Planning Policy Framework 2019 (NPPF) that states 'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs...including planning for and allocating sufficient sites to deliver the strategic priorities' (para 23, NPPF).</p>
	New Homes for Purbeck 2018	No.	
	Pre-submission SA 2018	No.	Both the SHMA and the LHN provided the same number of homes needed. It was considered unreasonable to suggest an alternative number for the same reasons discussed above.

<p>Policy H2: The housing land supply</p>	<p>Issues and Options consultation 2015</p>	<p>Issue 3: where should the Council focus new settlement extensions:</p> <ul style="list-style-type: none"> ● disperse proportionately in line with existing Policy LD; ● disperse settlement extensions around the towns (Swanage, Upton and Wareham); ● disperse settlement extensions around the key service villages (Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford and Wool); ● disperse settlement extensions around the local service villages (Langton Matravers, Stoborough, West Lulworth and Winfrith Newburgh); ● disperse settlement extensions around other villages with a settlement boundary (Briantspuddle, Chaldon Herring, Church Knowle, East Burton, East Lulworth, Harmans Cross, Kimmeridge, Kingston, Lytchett Minster, Moreton Station, Studland, Ridge and Worth Matravers); and ● new criteria-based addition to Policy CO: Countryside to allow growth at other villages without a settlement boundary (Affpuddle, Bloxworth, Coombe Keynes, East Knighton, 	<p>A wide range of possible reasonable alternative options were considered throughout the SA process.</p> <p>Several options for housing development were explored using the sustainability of the settlements as the key element in the development of the options. New development in the more sustainable locations of Wareham scored the highest in terms of sustainability objectives.</p> <p>In addition to this, reasonable alternatives to reviewing the green belt for release of sites for housing were also assessed.</p> <p>Preferred Option 3 produced the least significantly negative environmental affects (see page 12 https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/submission-documents/sd49-sa-non-technical-summary-june-2016.pdf). Although the option could have significant short-term negative effects in relation to pollution and consumption of natural resources, this was mainly due to the construction process. Negative effects arising from the development of greenfield sites was considered mitigatable and concluded that negative effects could be reduced over the medium to long-term. The spread of development this option brought with it would have helped to alleviate the need to travel, though it was recognised that extra cars due to this development would have negative influences, particularly on pollution and resource consumption, that could not be completely offset.</p>
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Matter A: Legal Compliance and Procedural Requirements

		<p>East Stoke, Holton Heath, Morden (East and West), Moreton, Organford and Worgret).</p> <p>Issue 4: Potential large housing sites</p> <ul style="list-style-type: none"> • consider new development to the north and west of North Wareham; • consider new development to the west of Wareham; • consider new development to the south-east of Sandford; • consider new development around Lytchett Minster; • consider new development around Moreton Station (including Redbridge Pit); • consider new development west of Wool; and • consider new development to the north of Langton Matravers. 	
	<p>Options consultation 2016</p>	<p>Policy LD: direct development towards the most sustainable locations in the district, in accordance with a clearly defined hierarchy.</p> <p>Possible Alternative Option: Set out the scope for suitable settlement boundaries to be 'rounded off' thereby enabling some additional windfall development across the district.</p>	

		<p>Possible alternative site: provide a new village to the south of Lytchett Minster.</p> <p>Preferred Option 3 proposed the delivery of more than the objectively assessed housing need organised around infrastructure provision of large housing developments in accordance with the settlement hierarchy in order to fund new infrastructure provision. This option would have led to the loss of 74ha of green belt and 24ha of AONB land. It would have also opened up 142ha of AONB to the public in the form of open space;</p> <p>Alternative Option 2 proposed the delivery of more than the objectively assessed housing need in the south west of Purbeck. This option would have led to the loss of 33ha of green belt whilst opening up 74ha of green belt to the public in the form of open space. This option would also have lost 24ha of AONB land whilst opening up 142ha to the public in the form of open space; or</p> <p>Alternative Option 3 proposed to focus development in the north east of Purbeck impacting the AONB less. This option would have led to the loss of 48ha of green belt land whilst opening up around 74ha of green belt for public use through open space. This option lost less AONB land at</p>	
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		<p>21.5ha whilst opening up around 142ha to the public in the form of open space.</p> <p>Specific sites</p> <p>Wool</p> <ul style="list-style-type: none"> • Land south of Dorchester Road; • Land west of Purbeck Gate; • Land off Sandhills Crescent, East Burton; • Land at Giddy Green, East Burton; • Land adjoining Winfrith Technology Centre; • Site south of Wool; • Lower Hillside; • Land off the A352; and • Land at Portland House, East Burton. <p>Lytchett Minster</p> <ul style="list-style-type: none"> • Land west of Lytchett Minster; and • Land south-east of Lytchett Minster School. <p>Wareham</p> <ul style="list-style-type: none"> • Land at Worgret Manor <p>North Wareham</p> <ul style="list-style-type: none"> • Land adjacent to Tantinoby Farm • Land west of Westminster Industrial Estate, Bere Regis Rd. <p>Moreton</p> <ul style="list-style-type: none"> • Moreton Pit, Redbridge Road 	
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		<p>Lytchett Matravers</p> <ul style="list-style-type: none">• Land at Flowers Drove;• Land at Blaney’s Corner;• Field off Burbidge Close;• Land east of Wareham Road;• Land behind 36 & 38 Wareham Road;• Land adjacent to Primary School;• Land adjacent to 47 Wareham Road;• Land at Foxhills Cottage, Lytchett Matravers• Adjacent to Peach Cottage, Foxhills Lane, Lytchett Matravers;• Land adj. The Rectory, Jenny’s Lane, Lytchett Matravers;• Adjacent Sunnyside Farm, Wimborne Road, Lytchett Matravers;• Adj. Middle Road, Lytchett Matravers;• Land to read of 28-34 Wareham Road, Lytchett Matravers;• Land adjacent Willowbrook. <p>Upton</p> <ul style="list-style-type: none">• Land at Policeman’s Lane. <p>Langton Matravers</p>	
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		<ul style="list-style-type: none"> • Land adjacent to Durnford Drove; and • South of the Hyde. <p>Harman’s Cross</p> <ul style="list-style-type: none"> • Land rear of Eventide 	
	<p>New homes for Purbeck 2018</p>	<p>Bere Regis Neighbourhood Plan</p> <ul style="list-style-type: none"> • Continue using PLP1 Policy NW: North west Purbeck. • Allocate development sites for around 105 units to Bere Regis Neighbourhood Plan • Allocate development sites for 218 units to Bere Regis Neighbourhood Plan. <p>Wareham Neighbourhood Plan</p> <ul style="list-style-type: none"> • Allocate Land in SHLAA sites 6/23/0166 and 6/23/1314 for around 200 homes in North Wareham to Wareham Neighbourhood Plan. • Allocate land in SHLAA sites 6/23/1314 and 6/23/0167 to Wareham Neighbourhood Plan. <p>Site allocations:</p> <ul style="list-style-type: none"> • Option A: Together with neighbourhood plan potential allocation sites, provide 1,400 	<p>Once again a wide range of possible reasonable alternative options were considered throughout the SA process.</p> <p>Between 2016 and 2018 the housing need for Purbeck reduced quite significantly, from 268pa to 168pa. The Council felt it best to consult once more on housing allocations due to significant changes in housing need. Therefore the sustainability appraisal carried out for the New Homes for Purbeck considered a further 3 different housing scenarios including a spread of development, focussed development and one scenario somewhere in between. Options also discussed the possibility of allocating more homes to two Neighbourhood Plan groups.</p> <p>The following options were considered unreasonable alternatives and were not assessed:</p> <p>West Lulworth Neighbourhood Plan: West Lulworth Parish Council are no longer working towards producing a Neighbourhood Plan.</p>

		<p>homes comprising of 470 homes at Wool and 440 homes at Redbridge Pit/Moreton Station, 150 homes at Lytchett Matravers, 90 homes at Upton and 250 homes on smaller sites including 30 homes at Sandford.</p> <ul style="list-style-type: none"> • Option B: Together with neighbourhood plan potential allocation sites, provide 1,400 homes comprising of 650 at Wool and 500 at Redbridge Pit/Moreton Station, and 250 homes on smaller sites including 30 homes at Sandford. • Option C: Together with neighbourhood plan potential allocation sites, provide 1,400 homes comprising of 800 homes at Wool and 600 homes at Redbridge Pit/Moreton Station. 	<p>Arne Neighbourhood Plan: Arne Parish is composed of constraints making it difficult for the Neighbourhood Planning group to allocate sites. Additionally they were drafting their final plan when the NPPF requirements changed and allowed for LPA's to delegate housing numbers to Neighbourhood Planning groups. To allocate the plan a housing figure would have considerably hampered their progress.</p> <p>Spread development as much as possible (e.g. through a proportionate increase in the size of each settlement): This option would not be deliverable due to constraints and land availability</p> <p>Focus development at a new settlement (Bere Farm): This option would involve release of a significant amount of greenbelt land. This is likely to be unjustifiable as other options exist. There are also concerns about the deliverability / viability of this option as all facilities would need to be provided on site.</p> <p>Use land at Holton Heath to provide all the required housing: This option has not been considered as the harm to protected species that development here would cause is unable to be mitigated for.</p> <p>Provide approximately 650 new homes at Lytchett Minster: This option was considered as part of the SA report for the 2015 issues and options consultation. This option is no longer considered a reasonable</p>
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			<p>alternative in light of the reduction in the overall housing need for the district, and the Government’s statements about Green Belt in the Housing White Paper. Having reviewed the evidence, the Council has concluded that there are no exceptional circumstances to alter Green Belt boundaries at this area. There is also evidence of flood risk exacerbated by the A35 causeway.</p> <p>Provide approximately 500 homes at West of Wareham:</p> <p>This option was considered as part of the SA report for the 2015 issues and options consultation. This option is no longer considered a reasonable alternative in light of the reduction in the overall housing need for the district. The site is entirely located within the AONB, and other sites are available to provide for the district’s housing need outside the AONB.</p>
	<p>Pre-submission 2018</p>	<p>The following sites were assessed:</p> <ul style="list-style-type: none"> • Land to the east of Wareham Road, Lytchett Matravers; • Land at Blaney’s Corner to the south of Wimborne Road; • Lytchett Matravers, Land to the east of Flower’s Drove, Lytchett Matravers; • Land at Bere Farm, near Lytchett Minster and Lytchett Matravers; • Land to west of Lytchett Minster; • Moreton Pit, Redbridge Road, Moreton; 	<p>Once again a wide range of possible reasonable alternative options were considered throughout the SA process. All other reasonable alternatives were considered in earlier iterations of the SA.</p>

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		<ul style="list-style-type: none"> • Land to north of Moreton Station, Moreton; • Land at Policeman’s Lane, Upton; • French’s Farm, Policeman’s Lane, Upton; • Land to the west of Chalk Pit Lane and Oakdene Road, Wool; • Land to the north east of Burton Cross Roundabout, Portland House, Wool; • Land to the north west of Burton Cross Roundabout, Wool; • Land to east of Lower Hillside Road, Wool; • Land to south of Wool; • Land off A352, Wool; and • Land to the north of the railway line off Sandhills Crescent, Wool. 	
Policy H3: New housing development requirements	Pre-submission SA 2018	No.	To not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.
Policy H4: Moreton Station / Redbridge Pit	Options consultation 2016	<p>Care home: Preferred Option 9 – Sites 19 & 20</p> <p>Allied to the policy on Housing Mix, there is an identified need for new institutional housing (residential care) in Purbeck so, 2 potential sites are being advanced for consideration as part of the Preferred Option. These sites are Bovington Middle</p>	All reasonable alternatives have been assessed. To not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.

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		School and Keyworth Drive / Camp Farm, Sandford. See also Policy H2: The housing land supply	
	New Homes for Purbeck 2018	Two options for Moreton Station / Redbridge Pit.	
	Pre-submission SA 2018	Yes see Policy H2: The housing land supply	
Policy H5: Wool	Options consultation 2016	Care home: Preferred Option 9 – Sites 19 & 20 Allied to the policy on Housing Mix, there is an identified need for new institutional housing (residential care) in Purbeck so, 2 potential sites are being advanced for consideration as part of the Preferred Option. These sites are Bovington Middle School and Keyworth Drive / Camp Farm, Sandford. See also Policy H2: The housing land supply	All reasonable alternatives have been assessed. To not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.
	New Homes for Purbeck 2018	Three options for sites at Wool.	
	Pre-submission SA 2018	Yes see Policy H2: The housing land supply	
Policy H6: Lytchett Matravers	Options consultation 2016	See Policy H2: The housing land supply	All reasonable alternatives have been assessed. To not include this policy or to take a different approach would not respond to the available evidence and

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	New Homes for Purbeck 2018	One option for sites at Lytchett Matravers.	could result in less sustainable development, which would not be considered a reasonable approach.
	Pre-submission SA 2018	Yes see Policy H2: The housing land supply	
Policy H7: Upton	Options consultation 2016	See also Policy H2: The housing land supply	All reasonable alternatives have been assessed. To not include this policy or to take a different approach would not respond to the available evidence and could result in less sustainable development, which would not be considered a reasonable approach.
	New Homes for Purbeck 2018	One option for sites at Lytchett Matravers.	
	Pre-submission SA 2018	Yes see Policy H2: The housing land supply	
Policy H8: Small sites next to existing settlements	New Homes for Purbeck 2018 Pre-submission SA 2019	<ul style="list-style-type: none"> • Small sites policy: Allow small sites (not more than 30 homes) to be considered outside existing town and village boundaries where certain conditions are met. • Remove Policy CO Countryside and Policy LD General Location of Development: Allow development anywhere 	All reasonable alternatives were assessed.
	Pre-submission SA 2018	No.	There are alternative options than to including this policy. All of which have been considered through the New Homes for Purbeck SA when assessing more concentrated development. It is concluded that this option is the most suitable as it provides more sustainability to smaller settlements and reduces the impact on larger allocated sites than would be the case if more homes were allocated to them.

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Policy H9: Housing mix	Issues and Options 2015	Issue 14: self/custom build housing <ul style="list-style-type: none"> • allocate sites specifically for self-build projects • allocate a portion of settlement extension sites for self-build projects • use development contributions • allocate Council-owned land for self-build projects • do nothing and let those in need of a home buy from a developer or the existing housing stock 	All reasonable alternatives were assessed.
	Options consultation 2016	Policy HM: Self Build Housing <ul style="list-style-type: none"> • a new policy on housing mix will be added to provide for families with children and older people, and to provide an allowance for 5% self-build housing. 	All reasonable alternatives were assessed.
	Pre-submission SA 2018	No.	This policy is based on the relevant evidence. There is no reasonable alternative.
Policy H10: Part M of Building Regulations	Pre-submission SA 2018	No.	To not take this approach would lessen the ability to deliver homes to meet local needs. This would not be in accordance with the NPPF and would not be reasonable.
Policy H11: Affordable housing	Issues and Options 2015	Issue 13: affordable housing delivery: <ul style="list-style-type: none"> • increase the percentages of affordable housing on sites of 6 or more dwellings across the district and 11 or more in Upton and Wareham Town; 	All reasonable alternatives were assessed.

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		<ul style="list-style-type: none"> • leave the current percentages as they are; and • allocate more settlement extension sites that would deliver affordable housing. 	
	Options consultation 2016	Policy AH: Affordable Housing Updates to percentage requirements and thresholds in Policy AH will be made in accord with new viability evidence a successful government appeal in 2016.	All reasonable alternatives were assessed in previous iterations of the SA.
	New Homes for Purbeck 2018	Update PLP1 Policy AHT Affordable Housing Tenure: Encourage 10% of all affordable housing provided on eligible sites to be social rented. Do not update PLP1 Policy AHT Affordable Housing Tenure: Do not specify that 10% of all affordable housing provided on eligible sites will be encouraged to be social rented.	The following options were considered unreasonable alternatives and were not assessed: Remove an affordable housing policy: The District needs affordable homes. Make affordable more affordable: Unachievable in planning terms.
	Pre-submission SA 2018	No.	The NPPF requires plans to address local affordable home needs. This policy does that based on the relevant evidence. There is no reasonable alternative.
Policy H12: Rural exception sites	Options consultation 2016	Policy RES: updates to the market housing and affordable housing split allowed on rural exception sites in Policy RES will be made to reflect new viability evidence. Policy OD: Occupational dwellings in the countryside: a new policy will set out the criteria against which applications for rural workers' dwellings will be considered.	All reasonable alternatives were assessed.

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	Pre-submission SA 2018	No.	The policy’s general approach to considering rural exception sites is in accordance with the NPPF. There is no reasonable alternative
Policy H13: Rural workers homes in the countryside	Pre-submission SA 2018	No.	The policy’s approach to considering rural workers’ homes is in accordance with the NPPF. There is no reasonable alternative.
Policy H14: Second homes	New Homes for Purbeck 2018	<p>Policy PRH: Principal Residence Housing: Restricts ownership of new build homes within the AONB areas of the District to those who use it as their primary residence.</p> <p>District Wide policy: Restricts ownership of new build homes within the District to those who use it as their primary residence.</p> <p>No policy restricting second homes: No restriction of second home ownership.</p> <p>Build more market value homes: Builds more homes to try and offset the effect of second home ownership within the District.</p>	<p>The following options were considered unreasonable alternatives and were not assessed:</p> <p>Policy E: Restriction of a percentage of stock of new homes for locals only: Unachievable in planning terms.</p> <p>Policy F: Tariff on second homes: Unachievable in planning terms.</p> <p>Policy G: Restricting stock as per Section 157 of the Housing Act 1985: Unachievable in planning terms.</p>
	Pre-submission SA 2018	No.	All reasonable alternatives were assessed in previous iterations of the SA.

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<p>Policy H15: Gypsy, traveller and travelling showpeople</p>	<p>Issues and Options 2015</p>	<p>Issue 15: Gypsies, Travellers and Travelling Showpeople</p> <ul style="list-style-type: none"> • allocate a proportion of settlement extensions as Gypsies, Travellers and Travelling Showpeople sites; • allocate new sites exclusively for Gypsies, travellers and Travelling showpeople. 	<p>All reasonable alternatives were assessed.</p>
	<p>Options consultation 2016</p>	<p>Preferred Option 10: Gypsies, travellers and travelling show people</p> <p>The Council has a statutory duty to meet the accommodation needs of gypsies, travellers and travelling showpeople. The Council is working jointly with other Dorset councils to update evidence and address identified need through a joint plan. Whilst extensive work has been undertaken to identify deliverable sites in the district, this had not yet led to identification of any sites. The Council will continue to investigate potential options. In the meantime, the Council’s preferred option is to prepare a criteria-based policy to allow sites for gypsies, travellers and travelling show people to come forward, subject to fulfilling certain criteria. The preferred option welcomes views on criteria that could be included in the policy but does not put forward any draft policy wording.</p>	<p>All reasonable alternatives were assessed in previous iterations of the SA.</p>

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	Pre-submission SA 2018	No.	The policy's criteria-based approach to considering sites for gypsies, travellers and travelling showpeople is in accordance with the NPPF. There is no reasonable alternative.
Policy EE1: Employment land supply	Issues and Options 2016	<p>Issue 6: meeting employment needs</p> <ul style="list-style-type: none"> • focus employment development at Dorset Green Technology Park (now known as Dorset Innovation Park); • focus employment development at Holton Heath; • focus employment development at Novington Middle School; • provide around 3ha of additional employment land at Upton; • provide around 1ha of additional employment land at Sandford Lane in North Wareham; • provide additional employment development at Sandford First School; • provide additional employment development at Botany Bay Farm at Bloxworth; and • provide additional employment development at Dorset County Council – owned depot off the B3351 at Corfe Castle. 	All reasonable alternatives were assessed.
	Options consultation 2016	Preferred Option 4: Assessed allocations of additional employment land at Upton, Holton Heath Trading Park, Sandford Lane Industrial Estate and Corfe Castle Depot.	The full range of safeguarded sites and sites suitable for future safeguarding were assessed.

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		Amending the employment area at Dorset Innovation Park (then known as Dorset Green).	
	Pre-submission SA 2018	The following sites were assessed: ES1: Holton Heath Trading Park, ES2: Dorset Innovation Park, ES3: Townsend Business Park, North Street, ES4: Old Milk Depot, ES5: Freeland Business Park, ES6: Factory Road Trading Estate, ES7: Axiom Centre, ES8: Romany Works Estate, ES9: Prospect Business Park, ES10: Victoria Avenue Estate, ES11: Sandford Lane Estate, ES12: Admiralty Park, Westminster Road, Wareham and Johns Road, Wareham.	
Policy EE2: Planning for employment	Pre-submission SA 2018	No.	The policy's approach to considering proposals for new employment uses and for redevelopment or change of use of employment land is in accordance with the NPPF. There is no reasonable alternative.
Policy EE3: Vibrant town and local centres	Issues and Options 2015	<p>Issue 12: Local Centres</p> <ul style="list-style-type: none"> • use specific zones to identify local centres; • identify individual buildings to safeguard; and • use a criteria-based planning policy to assess planning permissions. <p>Issue 7: meeting retail needs</p> <ul style="list-style-type: none"> • deliver an additional 600sqm (net) food retail floor space; and • deliver more than 600sqm (net) food retail floor space. 	All reasonable alternatives were assessed.

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	Options consultation 2016	Preferred Option 5: Support the delivery of up to 600sqm (net) additional floor space through small-scale local food shops provided as part of proposed housing allocations at Wool, Lytchett Minster and Wareham.	There are no reasonable alternatives to this option due to a lack of suitable and available sites at the district's towns and the negative impacts of out-of-town-supermarkets.
	Pre-submission SA 2018	No.	The policy's approach to considering proposals for new retail uses and for loss of retail provision is in accordance with the NPPF. The plan could look at removing town / local centre status from some of the retail sites but this would be considered detrimental. The plan could also look at allocating more land for retail but this is considered unnecessary and will be reconsidered upon review of the plan in 5 years' time. This is due to the fluctuating retail climate that the UK is currently, and has in recent years, experienced.
Policy EE4: Supporting vibrant and attractive tourism	Options consultation 2016	Policy TA: Tourism Accommodation and Attractions from PLP1	No reasonable alternatives were assessed as it was considered the current policy was sufficient and was assessed as part of the development of PLP1.
	Pre-submission SA 2018	No.	Supporting and protecting tourism uses is in line with the requirements of the NPPF. There is no reasonable alternative to this approach.
Policy I1: Developer contributions to deliver Purbeck's infrastructure	Pre-submission SA 2018	No.	The policy sets out the developer contribution requirements, as advised by the NPPF. There is no reasonable alternative.

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Policy I2: Improving accessibility and transport	Pre-submission SA 2018	No.	The policy's approach to improving transport networks and considering proposals and their accessibility requirements is in accordance with the NPPF. There is no reasonable alternative.
Policy I3: Green infrastructure, trees and hedgerows	Pre-submission SA 2018	No.	The policy aims to protect and enhance green infrastructure. This is in accordance with the NPPF. There is no reasonable alternative.
Policy I4: Recreation, sport and open space	Options consultation 2016	Preferred Option 12: This option seeks to consider open space and green infrastructure provision on each of the proposed housing sites on a case by case basis.	All reasonable alternatives were assessed.
	Pre-submission SA 2018	No.	The policy's approach to ensuring sufficient recreation, sport facilities and open space is delivered and protected alongside development is in accordance with the NPPF. There is no reasonable alternative.
Policy I5: Morden Park strategic suitable alternative natural green space and holiday park	Issues and Options 2015	Issue 16: country park and tourist accommodation at Morden <ul style="list-style-type: none"> • develop land at Morden for public open space and around 80 – 100 holiday chalets; and • do not develop land at Morden for public open space and holiday chalets. 	All reasonable alternatives were assessed.
	Options Consultation 2016	Preferred Option 11: Morden Country Park Allocate land at Morden for public open space and around 80-100 holiday chalets	All reasonable alternatives were assessed.

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		subject to agreement of a delivery mechanism for the strategic Suitable Alternative Natural Greenspace (SANG)	
	Pre-submission SA 2018	No.	Evidence gathered by the Council indicates that a strategic SANG is required in the north of Purbeck to mitigate for infill and windfall homes unable by virtue of their size to provide bespoke heathland mitigation measures. The site has been identified as capable of accommodating a SANG and would be deliverable. To not deliver a SANG in this area of the district would either result in harm to the integrity of the heathlands or small sites being refused planning permission, harming the District's ability to deliver the homes it needs. This is not seen as a reasonable option.
Policy I6: Wareham integrated health and social care	Pre-submission SA 2018	No.	Evidence gathered by the Council indicates that new healthcare facilities are required in the District to meet future needs. The Middle School is an available site that could accommodate the facilities. To not identify the need for a new facility and available site would lower the ability for such a facility to be delivered. This is not considered a reasonable option.
Policy I7: Community facilities and services	Options consultation 2016	Policy CF: Community Facilities as per PLP1	No reasonable alternatives were assessed as it was considered the current policy was sufficient and was assessed as part of the development of PLP1.
	Pre-submission SA 2018	No.	The policy aims to deliver and protect community facilities and services. This is in accordance with the NPPF. There is no reasonable alternative.

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Policy IM1: Tools for delivery – The Purbeck Local Plan implementation strategy	Pre- submission SA 2018	No.	To not monitor could see the Plan being unresponsive and ineffective; this is not a reasonable alternative.
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Appendix 2

Date: 05 June 2019
Our ref: [Click here to enter text.](#)
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BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sue,

Pre-submission Purbeck Local Plan Habitats Regulations Assessment

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Overall Natural England advises the authority that the HRA as drafted sets out a detailed and comprehensive assessment of the effects likely to arise from the Pre-submission Local Plan.

Natural England concurs with the HRA conclusions set out at 8.7 that the Local Plan is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects on European site integrity can be drawn.

Detailed comments

Natural England supports the proposed modifications recommended in the HRA as set out in Table 2.

New Forest

Natural England is working closely with authorities in Hampshire to update and review the adverse effects from additional housing developments on the designated sites. The studies are as yet not concluded however Natural England can confirm that adverse effects are consistent with those on the Dorset Heathlands and that the likely avoidance/mitigation measures will also be analogous with the measures being implemented for Dorset residents. Therefore Natural England's view is that positive modifications to visitor behaviour on heaths in Dorset are likely to be transferable to positive behaviour when residents visit the New Forest.

Draft Poole Harbour Recreation SPD, since the HRA was written in September 2018 the authority has worked with Natural England and the Borough of Poole to develop a strategic mitigation approach to deal with increased recreation related impacts both in and around the Harbour arising from increased residential development. This document is as yet un-adopted, in part due to recent Local Government Review. The proposed measures and overall approach are supported by Natural England and the neighbouring competent authority. The HRA should be updated to show a consideration of this positive approach on avoiding harm within the part of the authority area where harmful effects are most likely to arise.

Lytchett Matravers, Wareham and Upton allocations screening

These sites are now identified as falling within the draft Poole Harbour Recreation SPD and so the HRA needs to be updated to ensure appropriate screening consideration.

Upton allocation screening

This has omitted to screen in nutrient neutrality.

Discussions with the authority regarding housing allocations

Natural England and the authority have worked with promoters for the allocated, in all cases the SANGs identified are consistent with the advice set out in the Dorset Heathlands Planning Framework 2015 - 2020 SPD and in Natural Englands professional opinion will secure appropriate avoidance and mitigation if allocated.

I trust this advice will assist you and the authority in considering the application further.

Yours sincerely

Nick Squirrell
Conservation and Planning Lead Advisor
Dorset and Hampshire Team
Dorset, Hampshire and Isle of Wight Area Team
Natural England
Mob: 07766 133697
Email nick.squirrell@naturalengland.org.uk