

# Dorset Council

Purbeck Local Plan (2018-2034)

Response to Inspector's Matters, Issues and Questions

Matter D: The strategy for development

7 June 2019

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## Matter D: The strategy for development

### Issue 1: Spatial Strategy

#### Question 1

Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- the identification and assessment of reasonable alternatives; and
- the overall scale and distribution of development?

#### *Identification and assessment of reasonable alternatives*

1. The Council has assessed reasonable options for the spatial strategy, as set out in the Sustainability Appraisals (SA) which accompanied the three Regulation 18 consultations: Issues and Options (2015); Options (2016); and New homes for Purbeck (2018). The preparation of the Purbeck Local Plan has been an iterative process, with a significant reduction in the overall number of homes sought between the 2016 Options consultation and the 2018 New homes for Purbeck consultation. As such, the 2018 SA report [SD54] is the most relevant in terms of assessing reasonable alternatives for the spatial strategy. The 2018 SA report was prepared in the context of a local housing need of around 170 homes per year.
2. The Council's spatial strategy is largely focussed on housing provision, as one of the most significant issues that the Purbeck Local Plan must address. The 2018 SA report [SD54] includes the assessment of the following options for the distribution of housing growth, which are relevant to the spatial strategy of the plan:
  - **Three options for the distribution of housing site allocations across the plan area:** Options A, B and C, ranging from spreading development as far as possible, to focussing development at Wool and Redbridge Pit / Moreton Station, and with one option in-between the two.
  - **Three options for Bere Regis Neighbourhood Plan potential site allocations:** With options to provide a total of 50, 105 or 218 homes.
  - **Two options for Wareham Neighbourhood Plan potential site allocations:** Each option would provide a total of 200 homes, with one option involving Green Belt release; and the other option involving a different area of Green Belt release and the redevelopment of existing industrial estates for housing.
3. The Council considers that the above options are reasonable alternatives for delivering a housing requirement of around 170 homes per year, in the context of the environmental and policy constraints in Purbeck. The following options were not considered to be viable options and were therefore not assessed in any level of detail:
  - **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 in detail 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<sup>1</sup>. 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.

### *Rationale for the overall scale and distribution of development*

4. The Council considers that the overall scale and distribution of development, as set out in policy V1, is justified, effective and consistent with national policy. Purbeck has an exceptional natural, built and historic environment. Half of the plan area lies within the Dorset Area of Outstanding Natural Beauty (AONB). Nearly a quarter of the plan area is covered by national and international nature conservation designations, and a 400m buffer is in place around protected heathlands, where no residential development is permitted. A large part of Purbeck's coastline is designated as part of the Jurassic Coast World Heritage Sites. The Rivers Frome and Piddle run across Purbeck, discharging into Poole Harbour, and land around these rivers, as well as other land in the plan area, is at risk from flooding. Purbeck has a rich historic environment that includes over 1,400 listed buildings, over 250 scheduled monuments, 25 conservation area and 6 registered parks and gardens. In addition, approximately 19% of the plan area lies within the South East Dorset Green Belt.
5. The spatial strategy has necessarily been guided by national planning policies relating to these areas and assets of particular importance. The strategy has also necessarily focussed on housing provision, as meeting the need for homes is one of the most significant issues that the Purbeck Local Plan must address. The largest settlements in

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<sup>1</sup> The 2015 Issues and Options SA report can be accessed via: [www.dorsetcouncil.gov.uk/purbeck-local-plan-consultations](http://www.dorsetcouncil.gov.uk/purbeck-local-plan-consultations)

Purbeck (Swanage, Upton and Wareham) are all subject to significant constraints to development, as summarised below.

6. Swanage is located entirely within the AONB and is affected by areas of flood risk along the Swan Brook and Ulwell Stream and along the sea front. The Swanage Local Plan allocates sites for 200 homes on the edge of the town (161 of which have planning permission). The Strategic Housing Land Availability Assessment (SHLAA) [SD22] concludes that all other available large sites on the edge of Swanage are unsuitable for residential development. This is for a variety of reasons including flood risk, potential impact on the AONB, and uncertainty about how adverse impact on European sites could be avoided or mitigated.
7. Wareham is surrounded by either AONB (to the east and south of the town) or Green Belt (to the north, east and west, and between the northern and southern parts of the town). Wareham is also affected by significant areas of flood risk along the rivers Frome and Piddle. Land to the east of the town is within 400m of protected heathlands. The SHLAA identifies two available large sites in the Green Belt to the north of Wareham which could be suitable for residential development (SHLAA/0059 and SHLAA/0058), subject to there being exceptional circumstances for Green Belt release. In both cases, appropriate heathland mitigation would be required, and one of the sites (SHLAA/0058) is located in particularly close proximity to protected heaths. Sites to the south and west of Wareham have also been considered through the SHLAA (SHLAA/0097, SHLAA/0092, SHLAA/0090, SHLAA/0089, SHLAA/0088, and SHLAA/0087). These sites are identified as unsuitable for residential development for a variety of reasons, including flood risk, sites not being closely related to Wareham, potential adverse impact on the AONB and a lack of exceptional circumstances for large scale development in the AONB, and uncertainty about how adverse effects on European sites could be avoided or mitigated.
8. Upton is almost entirely surrounded by Green Belt. The town is contained to the north and west by the A35 and large areas of land to the south of Upton (adjoining Lytchett Bay) are at risk of coastal and tidal flooding. Large parts of the town are within 400m of protected heaths. The Poole Local Plan identifies land at Turlin Moor, adjacent to Blandford Road and to the south of Upton, to provide approximately 400 homes (Policy PP9 of the Poole Local Plan). The Purbeck SHLAA identifies two sites to the south of Upton which could be suitable for development, subject to there being exceptional circumstances for Green Belt release. One of the sites (SHLAA/0098) is located within 400m of protected heathlands, and is being promoted for a care home and employment units. The other site (SHLAA/0039) is being promoted for housing, and would essentially extend the recently completed Policeman's Lane development.
9. Given the significant constraints to growth affecting the three towns, the Council needed to consider opportunities elsewhere in Purbeck, and particularly in the west of the plan area, where land is less environmentally constrained. The SHLAA identifies opportunities for development at Wool and Moreton Station / Redbridge Pit in the west of the plan area, and (to a lesser extent) at Bere Regis in the north west of the plan area. The SHLAA also identifies sites which could potentially be suitable for development near Lytchett Matravers and Lytchett Minster, subject to there being exceptional circumstances for Green Belt release. The Green Belt Study [SD24]

identifies exceptional circumstances for Green Belt release at Upton, Wareham and Lytchett Matravers.

10. This led to the identification of three options for the Council's overall strategy, which were included in the 2018 'New homes for Purbeck' consultation. The three options all included a focus on growth at Wool and Moreton Station / Redbridge Pit, in the less environmentally constrained west of the district, and some growth at Bere Regis and Wareham, with specific sites to be identified through neighbourhood plans. The options can be summarised as follows:
  - Option A: spread development as much as possible. This option included Green Belt release at Upton and Lytchett Matravers, as well as providing homes in the less environmentally constrained parts of the plan area (at Wool and Redbridge Pit / Moreton Station). This option would also include the use of smaller sites across the plan area, through the introduction of a small sites policy. Homes would also be provided at Wareham (including limited Green Belt release) and Bere Regis, through the respective neighbourhood plans.
  - Option B: focus the majority of development on two main sites but also include the use of smaller sites across the district. This option would provide homes at Wool and Redbridge Pit / Moreton Station, and would also include the use of smaller sites across the plan area, through the introduction of a small sites policy. Homes would also be provided at Wareham (including limited Green Belt release) and Bere Regis, through the respective neighbourhood plans.
  - Option C: focus development on two main locations. This option would provide a large number of homes at Wool and Redbridge Pit / Moreton Station. Homes would also be provided at Wareham (including limited Green Belt release) and Bere Regis through the respective neighbourhood plans.
11. Each of the options offered an opportunity to achieve sustainable development, was consistent with national policy and does not have significant impact that outweighs the benefits of development (as guided by the Environmental and Infrastructure Capacity Study [SD16] and the Sustainability Appraisal [SD52]).
12. The Council received over 6,700 responses to the consultation, representing almost 30% of households. There was most support for Option A (42% of respondents), with Options B and C receiving less support (26% and 25% respectively). This gave a clear indication to the Council that the local population favoured a spread of development as far as possible.
13. Taking account of responses to the consultation, the Council's preferred spatial strategy is to spread development as much as possible, including releasing some areas of the Green Belt for homes as well as providing homes in the less environmentally constrained west of the District. It also includes homes to be provided at Wareham (including limited Green Belt release) and Bere Regis through the respective neighbourhood plans, and includes the use of smaller sites geographically spread across the district subject to the criteria outlined in the small sites policy (H8).
14. In summary, the Council considers that the overall scale and distribution of growth is justified, effective and consistent with national policy, for the following reasons:

- It has been prepared taking account of environmental constraints;
- It will deliver a spread of new homes across the plan area, where they are needed;
- It will deliver a resilient supply of land for new homes;
- It limits the impacts of new homes on existing infrastructure; and
- It provides an opportunity to maintain and enhance rural communities.

### Question 2

**Is the scale, type and distribution of development as set out in policy V1 (*Spatial strategy for sustainable communities*) justified, effective and consistent with the overarching vision and spatial strategy of the Plan?**

*Consistent with overarching vision and spatial strategy*

15. The Council considers that the scale, type and distribution of development as set out in policy V1 is consistent with the overarching vision and spatial strategy of the plan.
16. The vision of the plan includes an aspiration to spread development across the plan area, with the majority of new homes being in the less environmentally constrained areas in the west. The vision also includes an aspiration for development to continue to be supported in the towns and key service villages, proportionate to the size and character of the settlement. The distribution of housing development set out in policy V1 is consistent with this vision: it provides for the majority of new housing allocations in the less environmentally constrained parts of the plan area, including Wool, Redbridge Station / Moreton Pit and Bere Regis. It provides for some growth at the towns of Wareham and Upton, whilst some growth is already planned at Swanage through the Swanage Local Plan. It provides for housing allocations at the key service villages where these are appropriate taking account of environmental and policy constraints (Bere Regis, Lytchett Matravers, Redbridge Pit / Moreton Station, and Wool).
17. The vision of the plan includes an aspiration to provide an appropriate mix of housing sizes and tenures, including supported housing for the elderly and other groups with special needs. The provision in policy V1 for two 65 bed care homes at Wool and Redbridge Pit / Moreton Station is consistent with this vision, and with the focus within the overall spatial strategy on the less environmentally constrained parts of the plan area.
18. The vision of the plan includes an aspiration to support employment opportunities within the towns and key villages, as well as supporting the continued development of Holton Heath and Dorset Innovation Park. The overall strategy for employment development set out in policy V1 is consistent with this vision.

*Justified and effective*

19. The Council considers that the scale, type and distribution of development set out in policy V1 is justified and effective. The justification for the scale and distribution of housing is summarised above in response to Question 1. The provision of two 65 bed



care homes will contribute towards meeting the need for specialist housing for older people, as identified in the Strategic Housing Market Assessment [SD21] (see also the Council's response to Matter E, Issue 1, Q2).

20. Policy V1 sets out that employment development will be directed to the strategic employment sites at Dorset Innovation Park and Holton Heath and other identified employment sites, as identified in policy EE1. The Council considers that this approach is justified when considered against the reasonable alternatives, as assessed through the iterative SA process which has accompanied plan preparation (see Appendix 1 of the Council's response to Matter A for a summary of alternatives considered). The Economy Background Paper [SD25] identifies that there is a surplus of employment land available at existing employment sites in the plan area, and therefore no additional land needs to be allocated for development.

### Question 3

#### **Should policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?**

21. Small sites and windfall development form a key part of the Council's overall strategy for development, as highlighted by policy H2 (housing land supply). As such, the Council would support the addition of text to part 1 of policy V1 to refer to the role of these sites in achieving the overarching vision for development in Purbeck. This would also necessitate a consequential change to the first sentence of policy V1, as small sites and windfall sites are not allocations. The Council suggests that part 1 of policy V1 could be amended as follows:

#### **Policy V1: Spatial strategy for sustainable communities**

1. To deliver the Council's vision for Purbeck, the Purbeck Local Plan makes provision for new allocates sites for housing as follows:

a. Allocated sites:

- Moreton Station / Redbridge Pit – 490 new homes
- Wool – 470 new homes
- Lytchett Matravers – 150 new homes
- Upton – 90 new homes.

See policies H4, H5, H6 and H7 for more detail about these allocated sites.

b. Neighbourhood plan sites at:

- Wareham – 300 new homes including windfall
- Bere Regis – 104 new homes.

c. Small sites next to existing settlements and windfall within existing settlements, where these meet the requirements of all relevant development plan policies.

22. The Council has included the above suggested change (reference MM23) in the updated 'Schedule of possible modifications' (June 2019) which has been submitted to the Inspector alongside the Council's responses to the Matters, Issues and Questions.



### Question 4

**Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council's vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?**

23. Yes, the Council considers that this approach is consistent with national policy. Paragraph 23 of the Framework states that "Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)".
24. Policy V1 identifies site allocations at Moreton Station / Redbridge Pit, Wool, Lytchett Matravers and Upton, to help meet the overall housing requirement. In the case of Wareham and Bere Regis, it is more appropriate for sites to be allocated through the emerging neighbourhood plans. In both cases, the neighbourhood plans are well-advanced: the Wareham Neighbourhood Plan is currently at examination; and the Bere Regis Neighbourhood Plan has passed referendum, and is due to be 'made' shortly. Both plans identify sites to meet the housing numbers specified in policy V1, albeit that the Wareham neighbourhood plan cannot allocate one site (for 60 homes) at this stage, as the land is currently within the Green Belt. As explained in response to question 5 below, the Purbeck Local Plan proposes to release land from the Green Belt at Wareham, which would facilitate the allocation of land for 60 homes through a revision of the Wareham Neighbourhood Plan.
25. Paragraph 29 of the Framework highlights the role of neighbourhood planning in enabling communities to develop a shared vision for their area. It is the Council's view that the approach taken in policy V1 is fully in the spirit of neighbourhood planning. This approach has enabled the local communities in Bere Regis and Wareham to directly shape the future of their areas, by identifying where future homes should be provided through the neighbourhood plans.

### Question 5

**How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?**

26. The Wareham Neighbourhood Plan is currently at examination. The Submission Draft Neighbourhood Plan (dated October 2018)<sup>2</sup> identifies a total of seven sites for potential housing delivery, as summarised in the table 1 of the Neighbourhood Plan (copied below, policies referred to are proposed neighbourhood plan policies). In addition, the

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<sup>2</sup> The Wareham Neighbourhood Plan submission draft can be accessed via:  
<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/neighbourhood-planning-purbeck/wareham-neighbourhood-plan.aspx>

Neighbourhood Plan estimates that 100 dwellings will come forward as windfall over the period 2019 to 2034.

Potential Housing Delivery		
Site	Dwellings	Notes
West of Westminster Road (H4)	60	Subject to change in Green Belt boundary in Purbeck Local Plan
Westminster Rd Industrial Estate (H5)	30	Whole site may not come forward in Plan period - assume 33% of 90 dwell.
Johns Road (H6)	15	Whole site may not come forward in Plan period - assume 50% of 30 dwell.
Hospital/Health Centre site (H8)	40	Subject to relocation of health facilities
Former Middle School site (GS2)	35	Extra care housing / keyworker housing / care home in association with proposed health hub
Cottees site (H9)	10	
Former Gasworks site (H7)	10	
Windfall	100	Assume 66% of average small sites windfall development of 10 dwellings p.a. over 2003-17
<b>Total</b>	<b>300</b>	

27. One of the sites identified above (land West of Westminster Road) is currently in the Green Belt, and the site cannot therefore be allocated for development in the neighbourhood plan in advance of adoption of the Purbeck Local Plan. The Neighbourhood Plan Policies Map identifies land in this location as an “area for future consideration”, and the neighbourhood plan text states the following in relation to land in this area:

“Consideration be given to adding a Policy when the Neighbourhood Plan is revised following adoption of the revised Purbeck Local Plan” (p.18 of the Submission Draft Neighbourhood Plan).

28. The Purbeck Local Plan proposes to remove a smaller area of land from the Green Belt at Wareham, as compared to the “area for future consideration” identified in the neighbourhood plan. This is because the Council has identified that the land immediately to the south of Bere Road is not currently available for housing. Both areas are shown in Appendix 1. The land proposed for release from the Green Belt through the Purbeck Local Plan has a total area of 2.78 ha, and is therefore of sufficient size to accommodate 60 dwellings. The removal of this land from the Green Belt will facilitate allocation of land in this area for housing through a revision of the Neighbourhood Plan.

**Question 6**

**Is the change to policy V1 (MM1) indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is effective?**

29. As currently drafted, part 4 of policy V1 could imply that all planning applications for small sites next to existing settlements will be granted. The Council has therefore identified a possible change to policy V1 (MM1) to remove reference to the small sites policy (H8). This change would improve the clarity of the policy, and hence would ensure that the policy is effective. The Council supports this clarification to the policy.

## Appendix 1: Comparison of Wareham Neighbourhood Plan and Purbeck Local Plan areas identified (west of Westminster Road)

