

# Dorset Council

Purbeck Local Plan (2018-2034)

Response to Inspector's Matters, Issues and Questions

Matter E: Housing

7 June 2019

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## Matter E Housing

### Issue 1: Housing Allocations (Policy H4, Policy H5, Policy H6 and Policy H7)

#### Question 1

**(a) Having regard to the fact that the issue of whether exceptional circumstances have been demonstrated to justify the alterations to the boundary of the Green Belt as proposed in the Plan to provide for housing development at Lytchett Matravers (Policy H6) and Upton (Policy H7) has been addressed above, are these allocations otherwise soundly based and are the allocations at Moreton Station/Redbridge Pit (Policy H4) and Wool (Policy H5) soundly based?**

1. Yes, the Council's proposed housing allocations:
  - a) *have been positively prepared* – the Council considers that the land identified at Lytchett Matravers, Moreton Station/Redbridge Pit, Upton and Wool is likely to deliver 1,200 new homes. These homes will make a significant contribution to the total number of new homes that the Council has assessed are required in Purbeck between 2018 and 2034, and an important contribution to its strategy for meeting this requirement;
  - b) *have been justified with appropriate evidence* – the Council's evidence (including i. sustainability appraisals [SD02, SD49, SD50, SD51 and SD52], ii. its environmental and infrastructure capacity study [SD16], iii. its positive and ongoing engagement with consultees as documented in [SD06a, SD06b, SD06c, SD06d and SD07], and iv. its selection of an appropriate housing strategy [SD19]) demonstrates that it has considered alternative strategies for addressing the area's housing requirements, engaged with consultation bodies/local people on the key housing sites and taken key planning considerations (including legislation and planning policies relating to areas and assets of particular importance, as defined in paragraph 11 and footnote 6 of the National Planning Policy Framework 2019 (NPPF)) into account when selecting sites and drafting the requirements in policies H4 to H7;
  - c) *are effective* – the Council has identified the infrastructure needed to support new homes around Lytchett Matravers, Moreton Station/Redbridge Pit, Upton and Wool (infrastructure delivery plan SD28) and made provision for this to be delivered through the requirements in planning policies (H4 to H7). The Council is satisfied that it has addressed the duty to co-operate through active and ongoing engagement with neighbouring councils (see responses to Questions 1 to 4, Matter A, Issue 1 of the Planning Inspector's Matters, Issues and questions). The collaboration between councils has been constructive, but has not yet clearly and precisely quantified an 'unmet' housing need. The Council is committed to ongoing joint working to address any unmet housing need. The Council has outlined an implementation, delivery and monitoring strategy so that the effectiveness of its housing allocations policies can be reviewed. The Council has also undertaken a series of viability appraisals [SD31 to SD37], which demonstrate that the allocated

housing development is achievable whilst meeting the requirements of policies (including policies H9, H10, H11 and I1) in the local plan; and

- d) *are consistent with national policy* – the Council’s housing allocations take account, and are consistent with the objectives and requirements, of national policy (in particular: i) the objective of seeking to achieve sustainable development, ii) delivering a sufficient supply of homes, iii) promoting healthy and safe communities, iv) promoting sustainable transport, v) making effective use of land, vi) achieving well-designed places and vii) conserving and enhancing the natural environment).

**(b) Was the identification process of the allocations at Moreton Station/Redbridge Pit (Policy H4), Wool (Policy H5), Lytchett Matravers (Policy H6) and Upton (Policy H7) robust, what factors were taken into account in the assessment process to determine the sites for allocation and was the assessment robust?**

- 2. Yes, the Council’s process for identifying suitable housing sites for policy allocations was robust. The site selection process is described in the Housing Background Paper [SD19]. The Council has taken the following factors into consideration when selecting sites for housing allocations in its local plan:
  - a) seeking a balanced pattern of development – the Council selected a range of housing sites across Purbeck (following consultation of alternatives in the ‘New Homes for Purbeck’ consultation in spring 2018 [SD06d] and after engaging with local communities on neighbourhood plans) in order to encourage a balanced pattern of development that would meet the area’s housing requirements;
  - b) availability/resilient supply of land for homes – the Council sought confirmation that all the land presented in the Strategic Housing Land Availability Assessment was available for housing at the same time as meeting its responsibilities in regard to the General Data Protection Regulation in the summer of 2018. The Council considers that the variations in the size, location and expected delivery rates on the allocated housing sites creates resilience and contributes toward meeting Purbeck’s housing requirement over the local plan period;
  - c) promoting sustainable patterns of development– for example taking account of the opportunities to access facilities / services / employers / sustainable modes of travel and physical connectivity between the site and services / facilities / infrastructure / employers (paragraph 65 housing background paper SD19);
  - d) the opportunities for meeting Purbeck’s housing requirements on previously developed land – paragraph 75 of the Council’s housing background paper [SD19] describes how the Council explored the opportunities to meet the area’s housing requirements on previously developed land;
  - e) flood risk (avoiding sites where all/most of the site is at moderate or high risk from flooding – for example not including land to the east of the allocated site at Policeman’s Lane (SHLAA/0039) because of tidal and surface water flood risks);
  - f) habitats and biodiversity (avoiding sites where all/most of the site is positioned close to a Dorset Heathland or where it was not clear that appropriate avoidance or mitigation measures could be delivered) – for example sites close to Dorset

Heathland at land off Keysworth Drive Sandford (SHLAA/0060) and land at Camp Farm, Sandford (SHLAA/0141). And sites where it was not clear that appropriate/avoidance measures could be delivered at Belle Vue Farm, Swanage (SHLAA/0057) and Junction of Ulwell Road and Whitecliffe Road, Swanage (SHLAA/0053);

- g) green belt (fully examining alternatives for delivery of homes on sites outside the green belt as part of developing its housing strategy and ruling out sites where it did not find exceptional circumstances – for example land to the west of Lytchett Minster (SHLAA/0035) and land at Bere Farm near Lytchett Minster and Lytchett Matravers (SHLAA/0041));
  - h) Area of Outstanding Natural Beauty (avoiding sites where assessment suggested there were unlikely to be exceptional circumstances for major development – for example Belle Vue Farm Swanage (SHLAA/0057) and land to the north-west of Worgret Junction Worgret (SHLAA/0090));
  - i) tree preservation orders – for example land adjacent to Peach Cottage, Foxhills Road, Lytchett Matravers (SHLAA/0027);
  - j) conservation areas (avoiding sites where development is likely to adversely affect the character or appearance of the conservation area – for example land adjacent The Red Lion, Winfrith (SHLAA/0077));
  - k) listed buildings (avoiding sites where development is likely to have an adverse effect on the significance of a listed building – for example adjacent to Hunters Cottage East Chaldon (SHLAA/0015));
  - l) registered parks and gardens;
  - m) scheduled monuments;
  - n) groundwater source zone;
  - o) Purbeck Heritage Coast;
  - p) local nature reserves;
  - q) Sites of Nature Conservation Interest (SNCI);
  - r) regionally important geological sites; and
  - s) landscape and townscape – for example housing sites (SHLAA/0082, SHLAA/0100, SHLAA/0101 and SHLAA/0102 around Wool described in table 2 in the housing background paper [SD19]).
3. The Council considers that the assessments presented in the Strategic Housing Land Availability Assessment [SD22], and the other evidence which have informed the selection of sites for its housing strategy (including: habitats regulation assessment [SD03], strategic flood risk assessment [SD17], and green belt study [SD24/51]), have

been prepared in accordance with national planning policy and up-to-date/accurate<sup>1</sup> evidence on the nature and characteristics of the local area. For these reasons the Council considers that its assessments are robust.

### Question 2

#### **Is there robust evidence to support the inclusion of two 65 bed care homes in the Plan (Moreton Station/Redbridge Pit (*Policy H4*) and Wool (*Policy H5*))?**

4. A key driver of change in the future housing market is the expected growth in the population of older people. The Strategic Housing Market Assessment 2015 [SD21] includes consideration of the need for nursing and residential care homes (see paragraphs 9.36 and 9.37 of SD21). The SHMA identifies a need for 131 nursing and residential care bedspaces (use class C2) in the Purbeck area over the period 2013 to 2033 (table 86 of SD21).
5. The allocated sites at Wool and Moreton Station / Redbridge Pit are considered the most sustainable locations to incorporate the need for C2 accommodation. The Council considered two alternative sites (at Bovington Middle School and Keyworth Drive / Camp Farm, Sandford) for the provision of care homes through the Purbeck Local Plan Review Options SA Report [SD50]. The site at Bovington Middle School is no-longer available, and land at Keyworth Drive / Camp Farm is located within the green belt. An additional site (at Frenches Farm, Upton) has been promoted through the SHLAA [SD22] (SHLAA/0098) for a 65 bed care home. This site is also within the green belt. In line with national policy, the Council considers that it is appropriate to maximise opportunities for care home provision outside the green belt in the first instance
6. In addition to this, the Council recognises the needs to promote balanced and mixed communities that can help promote social interaction and inclusion. Providing care homes within the two largest housing allocation sites will help ensure there are opportunities for integration and inclusion.

### Question 3

#### **Is the requirement to explore opportunities for a community hub at Wool (*Policy H5*) justified?**

7. Yes. The requirement to explore opportunities for a community hub to serve the extra population in Wool is justified.
8. Policy H5: Wool proposes that developers should explore opportunities to provide a community hub that includes community and shopping facilities, on the Land to the west of Chalk Pit Lane and Oakdene Road. Policy I7 reinforces the expectation that where a development creates its own pressures provision will be provided on-site, but also

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<sup>1</sup> Following submission of the Purbeck Local Plan the Council received correspondence (relating to updated information on flood risk prepared by the Lead Local Flood Authority) from a land owner who has made land to the west of Lytchett Minster available for homes. The Council has considered the suitability of this land through the SHLAA/0035 – the site is omitted from the Council's housing strategy because the housing requirement could be addressed on other sites outside the green belt and it did not find that there were exceptional circumstances for changes to green belt boundaries.

provides opportunities for alternatives to on-site provision if an applicant provides robust justification.

9. The Wool Neighbourhood Plan group's primary objective at present is to enable connections between the existing residents of Wool and future residents of Wool. This will entail providing links between areas of the village and ensuring the community has a focal point. The current village hall is located approximately 800m from the land to the west of Chalk Pit Lane and Oakdene Road. Discussions with the Parish Council/Neighbourhood Plan group (including Reg. 19 comments PLPP550, PLPP567) indicate a lack of funds for maintaining this hall.
10. It may therefore be appropriate for the developers to provide reasonable and appropriate contributions towards the existing D'Urberville Hall to ensure that is fit for purpose, rather than providing a new community hall. The Council is in conversation with the Trustees of the D'Urberville Hall to determine whether this approach would be suitable and appropriate. Subject to agreement with the Trustees of D'Urberville Hall, the Council is supportive of the principle of securing contributions towards the existing hall. The Council considers that this can be considered in detail at the planning application stage.

### Question 4

#### **Are the assumptions regarding capacity of each of the allocations justified and based on available evidence?**

11. The Council considers that the assumptions relating to capacity of the allocated housing sites are justified. The Council has based its assessments on indicative layouts prepared by the planning agents representing land owners/promoters and informal meetings.
12. *Moreton Station/Redbridge Pit* - The Council assessed the site's capacity after reviewing initial drawings prepared by the planning agent in 2016 (presented in the relevant memorandum of understanding). In considering these initial drawings, the Council took into account the exclusion of the land to the north of the railway line (leading to a reduction in the overall capacity). The Council also noted that land shown on the initial drawings for provision of a school was no longer needed for this use, and hence could contribute to the overall site capacity for housing. The Council considers that the site's housing capacity is justified having regard to: delivering Suitable Alternative Natural Green Space within the site, the desirability of maintaining the character of the areas around the site, retaining specimen trees and those trees which contribute to the character of the area, securing well designed/attractive/healthy places and delivering undeveloped green spaces (which provide an opportunity to enhance biodiversity and an opportunity for recreation).
13. *Lytchett Matravers and Upton* - In the case of the housing sites at Lytchett Matravers and Upton the planning agents have prepared indicative layouts for proposed development in what they have described as 'delivery framework documents'. These documents explain how a series of key planning considerations (including: landscape character, heritage assets, biodiversity, flood risk/drainage and access), together with an assessment of each individual sites physical characteristics, context and setting, have been used to develop 'concept' masterplans. The masterplans include indicative



layouts showing a possible point of access into each site, an estate road layout, the position and number of new homes and land set aside for open green space.

14. The Council has reviewed the indicative layouts and supporting delivery documents and it considers that the densities of housing development in policies H6 and H7 are appropriate having regard to: the desirability of maintaining the character of the areas around the sites, securing well designed/attractive/healthy places and undeveloped green spaces (which will form part of drainage/flood management scheme and provide an opportunity to enhance biodiversity and for recreation).
15. *Wool* – The planning agent has prepared an indicative layout, (presented in the Wool memorandum of understanding endorsed by relevant parties) for proposed development on the allocated sites around Wool. The layouts prepared by the planning agent take account of: the site's landscape context (including its setting with the Dorset Area of Outstanding Natural Beauty to the south), the need to manage flood risk (this involves avoiding development in part as part of flood management), the historic environment, (including adjacent scheduled monument to the south of the sites and listed buildings), avoiding impacts on existing infrastructure, (the land to the west of Chalk Pit Lane and Oakdene Road is affected by this constraint), and land set aside for supporting infrastructure, (including green space, a local centre and a site reserved for a possible school site).
16. The capacity for the Wool housing allocations are based on the indicative masterplan for 470 homes prepared by Savills. The Council has reviewed the indicative layouts alongside other supporting evidence, and considers that the capacity of the housing site in policy H5 is appropriate having regard to: the desirability of maintaining the character of the areas around the sites, securing well designed/attractive/healthy places and delivering undeveloped green spaces, (which will form part of drainage/flood management scheme and provide an opportunity to enhance biodiversity and for recreation).

### Question 5

#### **Is there robust evidence that the development of the allocations is viable and deliverable?**

17. The Council considers the allocations at Wool, Upton and Lytchett Matravers to be viable and deliverable, with all sites starting to deliver homes in the first 5 years of the plan. The Moreton Station/Redbridge Pit site is in the local plan trajectory for year 6 (2023/24) onwards and is considered by the Council to be developable, with a reasonable prospect that it can be viably developed.
18. A full viability appraisal was carried out to support the Purbeck Local Plan Options consultation and Preliminary Draft CIL Charging Schedule in 2016 which included national standards and local policies. The Purbeck District Partial Review of Purbeck Local Plan Part 1 and revised Community Infrastructure Levy Economic Viability Assessment report sets out the methodology and findings [SD31].
19. The appendices of The Purbeck District Partial Review of Purbeck Local Plan Part 1 and revised Community Infrastructure Levy Economic Viability Assessment [SD32] set out:

- a) I The development appraisal assumptions;
  - b) IIa Residential Results Summary and Example Appraisal Summaries;
  - c) IIb Commercial Results Summary and Examples Appraisal Summaries;
  - d) III Market and Values Research, followed by EGi reporting extract and set out the results of the residential testing; and
  - e) IV Glossary of Terms
20. In 2017 a Viability Update and Sensitivity Testing [SD33] was commissioned to consider any changes in the market and the impact of self build homes and a requirement for some of the affordable homes to be social rented. The appendices to the update [SD34] set out:
- a) Appendix I - Development Appraisal Assumptions
  - b) Appendix II- Results of sensitivity testing
  - c) Appendix III- Values and other updated information review
21. In October 2018 the Council published a further viability study update [SD35-SD37] building on the original study from 2016 and the sensitivity Addendum in 2017, to inform the Purbeck Local Plan Pre-Submission Draft in accordance with the NPPF 2018.
22. The NPPF was also updated and supplemented in 2018. The previously established principles and good practice were addressed through the earlier viability work, and consistent also with the new guidance, have continued to be reflected appropriately.
23. The study considered representative development typologies and the larger sites which are proposed for allocation including sensitivity analysis of the allocations to show how variations in market values will impact on residual land value.
24. The viability appraisal states that, by and large, the policies, with some adjustments, are capable of informing and supporting a suitable balance between the commercial drivers of development, development quality and the residents' and wider community needs (through a re-set CIL charging schedule and the use of Section 106).
25. The main adjustments proposed in the viability study, relevant to allocated sites, are
- the removal of a 50% affordable housing policy in the south of the District (and some green field sites in the north), leaving a maximum 40% affordable housing on sites of 10 or more on green field land (as reflected in policy H11 of the submitted Local Plan); and
  - setting a zero CIL rate for strategic allocations of 200 or more dwellings as set out in the Draft CIL Charging Schedule and Priorities for Spending, January 2019 which has been submitted for examination
26. The most recent viability study [SD35-37] includes consideration of allocated sites. Given that the appraisals are, necessarily, of one moment in time, the study tested a

range of scenarios including variation in market profit levels and inclusion of 20% sheltered housing. The appraisals also included an increase in build costs of 10%. appendix 11a sets out two sets of RLV and EUV figures for the allocated sites to indicate point of appraisal (2018) figures (Table 3a) and results assuming a 10% increase in sales values.

27. Tables 3a and 3b set out residual land values, EUV and uplift from EUV for both the lower value scenario and an improved market value scenario. Using the lower values the results for most of the sites are around or above the recommended benchmark of £250,000 per ha with an uplift from EUV of between 857% and 3435%.
28. When the higher values are applied then all sites deliver more than £250,000/ha, with uplift on EUV ranging from (972% to 4960%).
29. Moreton Station/Redbridge Pit presents the most challenging viability at the lower values, mainly due to site infrastructure, the costs of which haven't been confirmed. This site is an active quarry coming towards the end of its life. It is in the housing delivery trajectory for year 6 onwards and is likely to benefit from an increase in market values over the first few years of the plan. The Council consider this site to be developable, with a reasonable prospect that it can be viably developed, and will continue to work with the Moreton Estate on the deliverability of the site as part of the new Dorset-wide local plan.

### Question 6

#### **(a) What are the assumptions about the scale and timing of supply and the rates of delivery?**

30. The Council expects new homes to start to be delivered on the housing sites around Lytchett Matravers, Upton and Wool in the first five years of the local plan period. Following submission of the local plan in January 2019 updated trajectories have been prepared to show when the Council and land owners/site promoters expect new homes to be delivered on all allocated sites up to 2034. The expected delivery rates over the next five years (commencing April 2019) are presented in Appendices B – D of the Council's latest five year housing supply statement (published May 2019 [SD38a]). The table below summarises expected delivery rates from allocated sites over the plan period.

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Allocations	2018/ 2019	2019/ 2020	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026	2026/ 2027	2027/ 2028	2028/ 2029	2029/ 2030	2030/ 2031	2031/ 2032	2032/ 2033	2033/ 2034
Lytchett Matravers / Upton			15	85	85	55										
Moreton Station / Redbridge Pit						50	50	50	50	50	50	50	50	50	40	
Wool			20	65	65	65	65	65	65	60						

Table 1: Summary of housing trajectory for allocated housing sites in the Purbeck Local Plan (2018-2034).

31. The Council has indicated in the Schedule of possible modifications [SD14] that it proposes to update the housing trajectory presented in the submission draft local plan to reflect the latest information on delivery and phasing supplied by the site owners and developers for allocated sites (MM4). An updated trajectory is presented later in this document, in response to Issue 2, Question 8. The updated trajectory reflects the updated information on the housing allocation sites presented in table 1 above.

**(b) Are the assumptions realistic?**

32. Yes. The Council's assumptions on deliverability have been guided by:

- a) Statements from the planning agents representing the land owners/site promoters about when they expect new homes to be delivered - these include confirmation from planning agents acting on behalf of land owners/site promoters that developers own or have an option to develop on all of the allocated housing sites and that there are no legal or ownership issues that are likely to delay delivery of homes on any of the sites<sup>2</sup>.
- b) Supporting statements and studies prepared by the planning agents representing the land owners/site promoters which indicate that the sites are suitable for development – the planning agents representing the land owners/site promoters at Lytchett Matravers, Upton and Wool have carried out significant preparatory work in order to demonstrate the suitability of the allocated housing sites. For Wool this includes preliminary archaeological investigations, character appraisals (taking account of heritage assets and landscape character), preliminary ecological surveys, reports relating to flood risk and other site constraints, (including those relating to a pipeline running through one of the housing sites). For Lytchett Matravers and Upton this includes character appraisals, (taking account of landscape character), ecological surveys, preliminary work on drainage scheme, (including managing flood risks from ordinary water courses/surface water), noise mitigation, (which relates to the Upton site), and accessibility/interconnectivity with neighbouring settlements.
- c) *The characteristics and nature of the housing sites* – the Council has visited all of the allocated sites and not identified any significant physical constraints, (i.e. steeply sloping landform, physical accessibility or connection to infrastructure/utilities), that could act as a barrier to delivering homes.
- d) *Preparatory ground work/work on drainage infrastructure/noise attenuation for the allocated housing site at Upton* – the developer on the adjacent housing site, (allocated for development through the Purbeck Local Plan Part 1), has completed preparatory ground works for the further allocated site, erected fencing along the western edge of the site with the A35 which would act as noise attenuation for both the completed/allocated homes and formed a surface water drainage scheme

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<sup>2</sup> Some of these statements are qualified, for instance the planning agent representing the land owner of Moreton Station/Redbridge Pit has stated that 'as long as two developers are present on site (which is not unrealistic for a site capable of accommodating 490 units), Terence O'Rourke envisages that the construction of the first dwellings would commence in the summer of 2023 and that 50 dwellings (including affordable housing units) would be completed by 31 March 2024.'

which, subject to adaptations, is capable of serving both the completed homes/allocated homes.

- e) *Delivery of homes on allocated sites in the Purbeck Local Plan Part 1 (2012)* – the Council has granted planning permission for all the allocated housing sites in the Purbeck Local Plan Part 1: this includes sites around Lytchett Matravers, Upton and Wareham. Housing development is completed on the allocated site at Upton (for 70 homes) and Wareham (for 153 homes). The Council granted planning permission for 46 homes at the allocation at Huntick Road, Lytchett Matravers on 9 May 2019 and delivery of these homes is expected within 5 years.
- f) Evidence relating to the housing market in Dorset<sup>3</sup>; and
- g) *The existing use of Redbridge Pit* – Redbridge Pit is an active mineral site coming to the end of its life and considered developable. The planning agents considers that the first six months (January 2023-June 2023) after remaining minerals have been extracted would be spent providing infrastructure to the site in the form of roads/utility connections and ensuring that the SANG is available for public use. Existing commitments to master planning this site with other sites in the area are anticipated to be carried forward into the new Dorset Local Plan.

### **(c) What evidence is there to support the assumptions?**

33. The Council has worked on preparing memorandums of understanding endorsed by planning agents/land owners/site promoters and statutory consultees and which confirm the delivery rates outlined in Table 2. The Council has also received supporting documentation which demonstrates suitability of allocated housing sites.

## **Question 7**

### **(a) Are the policy criteria set out in the relevant policies justified and effective?**

34. Yes, the criteria outlined in the Council's policies are justified. The Council considers that the criteria set out in the policies are:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - proportionately reflect the scale and type of development.

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<sup>3</sup> 'Last year most property sales in Dorset involved detached properties which sold for on average £460,331. Flats sold for an average price of £218,200, while semi-detached properties fetched £292,613. Dorset, with an overall average price of £327,091, was similar in terms of sold prices to nearby Bristol (County) (£314,474), but was more expensive than Somerset (£295,534) and Wiltshire (£290,671). The priciest area within Dorset was Sandbanks (£1,313,159) and the least expensive was Portland (£196,972). During the last year, sold prices in Dorset were 3% up on the previous year and 10% up on 2016 when the average house price was £298,557.' (<https://www.rightmove.co.uk/house-prices-in-Dorset.html> ).

35. The policies have been prepared taking account of relevant evidence and the Council has informally consulted with key consultation bodies (including infrastructure providers) and the planning agents acting on behalf of land owners/site promoters.
36. *Policy H4* – The transport modelling carried out for the Moreton/Crossways area indicates varying levels of impact on the road network, depending on the overall level of development but even the maximum levels of development tested did not result in a severe impact on the road network system. To mitigate such impact, the Council, working with other colleagues has identified infrastructure improvements to encourage and enable walking, cycling and the use of public transport, particularly the railway. These are identified in the Infrastructure Development Plan and meet the requirements of the NPPF paragraph 102. The Council is satisfied that the requirements in this part of the policy will allow the planning issues around promoting sustainable transport modes, providing safe/suitable access and addressing the effects of development on transport network to be satisfactorily addressed.
37. The requirements in Clause c. are justified by the spatial relationship between the housing site and a noise source, (the railway line which adjoins its northern boundary), and because of its current use, (minerals are currently being extracted from the site – the Council understands that the minerals planning permission allows material to be deposited in the excavations and for the site to be restored). The Council is satisfied that these clauses of the Policy will allow these considerations to be satisfactorily addressed.
38. The requirements in Clause d. are justified by the physical characteristics of the site – the Council has noted that there are a number of mature specimen oak trees growing along the site’s boundaries with Redbridge Road and B3390 and that the northern part of the site, (currently used as a caravan site), is heavily wooded. The trees growing within and around the site contribute to the appearance and character of its surroundings. Clause d. requires that ‘important’ trees growing on the site are taken into consideration when designing the layout for development/proposed buildings. Subject to appropriate supporting information, that the Council expects would be submitted as part of a planning application, it is satisfied that this clause will allow these matters to be satisfactorily addressed.
39. Clause e. relates to financial contributions to support health/education infrastructure. The Councils infrastructure delivery plan (page 11 SD28) indicates that the capacity in existing schools (at both primary and secondary levels) will need to be increased to support the demands arising from the allocated 490 new homes. Table 1 on page 13 [SD28] also indicates that the existing general practitioners surgery will need to be extended in order to supply the services needed to support the housing allocation. The Council is satisfied that this clause, and Policy I1, will allow the infrastructure needed to deliver these services to be delivered.
40. The Council considers that the allocation of 490 new homes is likely to generate significant amounts of ‘movement’. The Council considers that Clause f. is justified by the requirement in paragraph 111 of the NPPF. The Council is satisfied that this clause will allow this matter to be satisfactorily addressed.
41. *Policy H5* – The Purbeck Modelling Spatial Model Report, 2016 concluded impacts would not be severe and confirmed no in principle objection to the potential for 1000

dwelling at Wool (well beyond the 470 units now specified in Policy H5 Wool), plus growth of employment land at the Dorset Innovation Park. It did however recommend mitigation to offset adverse effects arising from the development 'such as improving walking, cycling and public transport links to and from the development site' should be provided.

42. The policy requires improvements to bicycle/pedestrian connectivity between employers, services and facilities in Clauses a., m. and q. of Policy H5 is justified by the requirements of national policy (paragraphs 102 (c) and 108 (a) NPPF) and the objective (listed as 'essential' on page 6 of the Council's Infrastructure Delivery Plan [SD28]) of improving linkages between the development and key sites, (including village centre, railway station and Dorset Innovation Park), in the surrounding area. The requirements in Clause b. are also justified by national policy, (paragraphs 102 (c) and 108 (a) NPPF), and in mitigating the effects of development on the transport network (the station improvements are listed as an 'essential' requirement on page 6 of the Council's Infrastructure Delivery Plan [SD28]).
43. The Council considers that the allocation of 470 new homes are likely to generate significant amounts of 'movement'. The Council considers that Clauses c. and d. are justified by the requirement in paragraph 111 of the NPPF and the relationship between the site and a nearby railway crossing and volumes of traffic on the local highway network. The Council is satisfied that this clause will allow this matter to be satisfactorily addressed.
44. The Council considers that Clause f., i., l., n. and q. are justified because of the relationship between the housing sites and heritage assets. These include a Scheduled Monument to the south of the site, (former Romano British settlement), and listed buildings in East Burton. After considering the relationship between the site and these assets, taking guidance from Historic England as part of preparation of memorandums of understanding, the Council is satisfied that these clauses will allow this matter to be satisfactorily addressed.
45. There is a potential source of contamination on the allocated housing site to the west of Chalk Pit Lane/Oakdene Road. Further investigation through a desktop study is needed to ascertain whether the site is likely to be contaminated or whether remediation is needed. The Council is satisfied that clause g. will allow this matter to be satisfactorily addressed.
46. The Council has explained the justification for including Clause h. as part of its response to Matter E, Issue 1, Question 3.
47. The requirements in Clause j. and o. are justified by the spatial relationship between the housing sites and a noise source, (the nearby railway line). The Council is satisfied that this clause will allow this matter to be satisfactorily addressed.
48. Parts of the site, (specifically the northern part of the site near to the railway line/embankment), allocated for housing to the north east of Burton Cross Roundabout are at risk from flooding. Land owners/site promoters have prepared a flood risk assessment and details of flood risk management/mitigation scheme to demonstrate the suitability of their site. The Council considers that the requirement in Clause k. to explore opportunities for delivering open space, is justified by the objective of seeking to



manage risks from flooding and creating an opportunity for sport/recreation. The Council is satisfied that this clause will allow this matter to be satisfactorily addressed.

49. *Policy H6* – The requirement to improve bicycle/pedestrian connectivity between Lytchett Matravers and Lytchett Minster in Clause a. of Policy H6 is justified by relevant evidence on the impacts of the development on local road networks and the requirements of national policy (paragraph 102 (c) NPPF 2019). Improving connectivity between the villages is also identified as an objective (listed as ‘desirable’) on page 7 of the Council’s Infrastructure Delivery Plan, [SD28]. Improving the opportunities for sustainable travel between the villages may reduce trips on the local road network, increasing its capacity. Since submitting its plan for examination the Council has identified a number of potential issues in delivering the infrastructure works it anticipated would improve connectivity between the villages. The Council is seeking to clarify the issues around this matter in advance of the hearings scheduled in August 2019.
50. Appendices 1 and 2 of the Council’s Infrastructure Delivery Plan indicates how it calculated the financial tariffs for contributions toward health and education infrastructure. The IDP indicates that there is a need for infrastructure in both primary (Lytchett Matravers) and secondary schools (Lytchett Minster) around the allocated housing site (page 11, IDP 2019 [SD28]). The Council’s IDP indicates that the number of new homes on the allocated site[s] (including the nearby site of Upton) is not sufficient to trigger the need for a new school. It indicates that there is a need for contributions toward a primary school site and playing fields (to support delivery of education services in primary and secondary schools). The Council is satisfied that clause b. will allow these matters to be satisfactorily addressed.
51. Table 1 in the Council’s IDP (page 13 SD28) indicates that both existing doctors surgeries in Upton and Lytchett Matravers require enlargement in order to meet the increased demand connected with the proposed development. The table in the Council’s IDP has been prepared in consultation with Dorset Clinical Commissioning Group. Policy I1 ‘Developer contributions to deliver Purbeck’s infrastructure’ describes the tariff that the Council will collect from new homes as contribution toward delivering necessary infrastructure (this calculation is based on the costs of building further treatment rooms/ancillary space in general practitioner surgeries as a proportion of the number of people expected to inhabit each new home). The Council is satisfied that clause b. will allow these matters to be satisfactorily addressed.
52. *Policy H7* –The allocated housing site is positioned close to the A35, a busy dual carriage way which bypasses Upton and provides access into Poole/Bournemouth. Clause a. of the policy requires applicants to address traffic noise from the A35. The Council considers that it is likely that traffic noise from the road will have an ‘observed adverse effect’, (based in part on noise survey work undertaken on an adjoining housing site at Policeman’s Lane), on the new homes – mitigation measures will be required to reduce adverse effects. The Council is satisfied that this clause will allow these matters to be satisfactorily addressed.
53. The justification for seeking financial contributions for health and education (as required by clause b. of Policy H7) has been outlined in paragraphs 18 and 19 above.

54. The Council has assessed whether development can viably meet the full costs arising from requirements in policies of the Purbeck Local Plan. The Council's viability assessments [SD31 to SD37] have specifically considered whether new homes can be delivered on the allocated sites (the most recent assessment [SD35] indicates that there is a reasonable 'prospects for viability' with the potential to meet costs arising from policies in the Council's emerging plan and infrastructure).

**(b) Is the change to policy H4 (Moreton Station/Redbridge Pit) (MM6) indicated in the schedule of possible modifications [SD14] necessary for the Plan to be sound?**

55. The Council considers Policy H4 to be sound, but the amendment would reduce the pressure on the viability of the site.

56. Moreton Station/Redbridge Pit is expected to be delivered from year 6 of the plan onwards. It is anticipated that it will be master planned alongside other sites under consideration in the Crossways area as part of the new Dorset Local Plan. These sites will have impact on the same transport network and improvement to station facilities would serve as mitigation for development in the Crossways/Moreton Station area as a whole. It is anticipated that station improvements would be part of a larger mitigation package.

### Question 8

**(a) Is there sufficient certainty that the necessary and suitable SANGs for the site allocations at Moreton Station/Redbridge Pit (Policy H4), Wool (Policy H5), Lytchett Matravers (Policy H6) and Upton (Policy H7) would be delivered?**

57. Yes, see responses for each of the allocated housing sites below:

- a) *Policy H4 (Moreton Station / Redbridge Pit)* – A possible SANG has been highlighted to the east of the site. As part of the Memorandum of Understanding, Natural England had confirmed that the SANG, details of which are to be agreed, will provide suitable mitigation for the homes identified.
- b) *Policy H5 (Wool)* – All parties, including Natural England, agree upon the suitability and deliverability of the proposed SANG, as confirmed in the memorandum of understanding between the Council, Savills (planning agents acting for the land owner/site promoters) and Natural England.
- c) *Policy H6 (Lytchett Matravers)* - The planning agent representing the land owner/site promoter of the allocated sites in Lytchett Matravers has entered into a memorandum of understanding with the Council and Natural England confirming that the Lytchett Matravers SANG can be delivered. As part of the memorandum, Natural England have confirmed that the size and position of the SANG is appropriate for addressing the effects from the allocated housing sites around Lytchett Matravers.
- d) *Policy H7 (Upton)* – An existing SANG that has already been delivered for housing development in Upton, (reference planning application 6/2017/0308), has capacity for addressing the effects of the new homes on the allocated site. Natural England

have confirmed that the existing SANG has capacity to address the adverse effects from both housing developments in the relevant memorandum of understanding.

**(b) Would the use of the site referred to in the Habitats Regulation Assessment [SD03] as suitable as a SANG to serve the site allocations at Wool (Policy H5) be consistent with national policy in relation to Ancient Woodlands?**

58. The proposed SANG immediately adjoins the H5 allocation (specifically the 'land to the west of Chalk Pit Lane') and will incorporate an existing cultivated agricultural field (which is designated as a Scheduled Ancient Monument) of 17 hectares and the adjoining northern component of Coombe Wood of 15.7 hectares (of which Replanted Ancient Woodland is 12.2 hectares).
59. Paragraph 175 of the NPPF requires that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused'. The SANG proposed to serve the site allocations at Wool is partly ancient woodland however will not result in the *loss of ancient woodland*, but will provide greater opportunity to increase biodiversity and enhancements to Coombe Wood than the current commercial forestry use.
60. Natural England are supportive of this site for a SANG to provide a greater opportunity to increase biodiversity and deliver other enhancements to Coombe Wood (including the replanted ancient woodland) than the current commercial forestry use, subject to the agreement of an appropriate management plan which will be submitted when a planning application is submitted. Please see memorandum of understanding for detailed plans.

### Question 9

**Is there an inconsistency between the wording of policy H1 (Local housing requirement) which indicates that 'Over the plan period of 2018 to 2034, at least 2,688 homes will be required .....**' and the wording of policies V1, H4, H5, H6 and H7 when referring to the number of homes to be provided on each site?

61. The Council considers that these policies are compatible with each other. Policy H1 refers to the overall housing requirement for the plan period, and indicates that '*at least* 2,688 homes will be required...' (emphasis added). This is in line with the PPG which states that the standard method 'identifies a minimum annual housing need figure' (Reference ID: 2a-002-20190220). The wording of policy H1 allows for additional homes to come forward (i.e. more than 2,688) through windfall development and small sites, where these meet all relevant planning policy requirements.
62. Policy V1 identifies the number of new homes to be provided on each of the local plan housing allocations. Policies H4, H5, H6 and H7 use the wording 'up to' to indicate that the number of homes to be provided on each site is effectively a maximum figure. The Council considers that this approach is appropriate for the site allocations. The housing numbers set out for each allocation have been informed by an assessment of site constraints and masterplanning work undertaken by site promoters. The proposed housing densities on the sites are optimal for their locations and represent an effective use of land. Higher densities would be likely to:

- a) harm the appearance of the surrounding areas;
- b) harm the setting of designated landscapes and heritage assets;
- c) jeopardise the delivery of important undeveloped land (necessary for flood risk management, recreation and wildlife);
- d) add excessive strain to supporting infrastructure (e.g. community facilities and SANGs); and
- e) undermine the Council's development strategy which aims to deliver balanced growth across the District.

### Question 10

**Is the wording in relation to the requirements of policies H4, H5, H6 and H7 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?**

63. Yes. The Council considers that the wording of these policies is sufficiently clear and effective for development management purposes. All policies in the plan have been prepared in consultation with development management officers, in order to ensure that they are effective for the purposes of determining planning applications. Policies H4, H5, H6 and H7 each clearly set out the type and scale of development expected on each site, (i.e. number of homes and size of care home where relevant), and include a clear list of requirements that development on each site will be expected to meet. Policy H5 (Wool) includes some requirements to 'explore opportunities' to provide infrastructure improvements. This wording provides some flexibility in terms of precisely how developers may provide the infrastructure required. Where this wording is used, the Council will expect developers to clearly demonstrate how they have explored opportunities, and why they are proposing a particular solution, at the planning application stage.

## Issue 2: Housing Land Supply (Policy H2)

### Question 1

**Is the distribution of housing as set out in policy H2 (The housing land supply) consistent with the overall spatial strategy?**

64. Yes. The Council's overall spatial strategy is to spread development across Purbeck as much as possible, whilst recognising that development will necessarily be focussed on the west of the plan area, where there are fewer environmental constraints. The housing land supply identified in policy H2 reflects this strategy. The provision of new homes is focussed on the less environmentally constrained areas of the district, particularly at Wool and Moreton, and also to a lesser extent at Bere Regis, (through the neighbourhood plan). The supply also provides for a spread of development through smaller site allocations, (identified either in local or neighbourhood plans), at Lytchett Matravers, Upton, Swanage and Wareham, and through windfall development and small sites next to existing settlements, which may come forward in line with policy H8.

### Question 2

**Is the housing land supply as set out in policy H2 likely to achieve delivery of the types of housing identified as being necessary in the SHMA [SD20 and SD21] and to be provided for through policy H9?**

65. Yes. The Council considers that there are no significant constraints to prevent delivery of the proposed housing mix, as set out in policy H9.
66. Policy H9 sets out that the Council will generally expect new market housing to support delivery of the household requirements identified through the SHMA [SD20 and SD21], as summarised in table 2 below.

	<b>1-bedroom</b>	<b>2-bedrooms</b>	<b>3-bedrooms</b>	<b>4+ bedrooms</b>
<b>Market Housing</b>	0-5%	30-35%	40-45%	20-25%
<b>Private rented</b>	10-15%	35-40%	35-40%	10-15%

Table 2: Recommended mix for market housing, as identified in the SHMA

67. Policy H9 also includes further requirements for the housing mix at larger sites, as summarised in table 3 below.

	Self-build plots	Single storey	Specialist accommodation for elderly
<b>Sites delivering 20 or more units</b>	5% of market homes	10% of market homes	n/a
<b>Purbeck Local Plan housing allocations (at Wool, Moreton Station / Redbridge Pit, Lytchett Matravers and Upton)</b>	5% of market homes	10% of market homes	20% of market and affordable mix – which could also contribute to single storey requirement

Table 3: Requirements for mix of market homes, as set out in policy H9

68. The housing land supply identified in policy H2 includes a range of site sizes, from very small proposals for a single dwelling which may come forward as windfall or small sites on the edge of existing settlements, to large local plan allocations at Wool and Moreton Station / Redbridge Pit. The Viability Study (2018 update) [SD35-SD37] tests a range of site typologies (Figure 2, page 13 of SD35) and also tests the proposed site allocations (Figure 3, page 14 of SD35).

*Delivering a range of dwelling sizes*

69. The Viability Study (2018 update) [SD35] uses the dwelling size mixes identified in the SHMA [SD20 and SD21] for the purposes of building up assumptions for viability testing<sup>4</sup>. The overall conclusions of the Viability Study are that the proposals in the Purbeck Local Plan “can be expected to continue to have reasonable prospects of viability while supporting a mix of development contributions” (paragraph 5 of SD35). The Council therefore considers that the provision of the mix identified in table 2 above for market housing is viable.

*Self-build plots*

70. The Viability Study (2018 update) [SD35] considers self-build plots at paragraph 2.6.12, stating that “the provision of plots for custom-build has the potential to be a sufficiently profitable activity so as not to prove a significant drag on overall site viability” and that it would be expected to be “at least neutral in viability terms, with the exact outcomes dependent on site-specific details”. As such, the Council considers that it is reasonable to assume that sites of 20 or more units (including local plan allocations) can provide 5% of the market homes as self-build plots.

*Single storey homes*

71. Policy H9 requires 10% of the market homes provided on sites delivering 20 or more units to be single storey homes. The 2016 Viability Study [SD31] includes testing of the impact of providing bungalows on a 20-unit scheme (paragraphs 3.11.8 to 3.11.11 of SD31). This test considered provision of 9 bungalows (6 private and 3 affordable rent) on a scheme of 20 units. The Viability Study [SD31] concludes that, whilst the scheme

<sup>4</sup> The Viability Study [SD35] considers market housing, affordable rented, and intermediate housing, and does not include specific consideration of private rented housing.

including bungalows results in a slightly lower residual land value, as compared to an 'all housing' scheme, the impact is relatively marginal (paragraph 3.11.10 of SD31).

72. The Viability Study [SD31] goes on to say that, in the view of the authors, the question of providing bungalows, "is going to be more about demand / need and therefore market support ... than the viability indications per se" (paragraph 3.11.11 of SD31). The 2015 SHMA [SD21] identifies a demand for bungalows, stating at paragraph 9.35 that "where developments including bungalows are found it is clear that these are very popular to older people downsizing". It also states at paragraph 10.80 that a growing older population will increase the demand for bungalows.
73. The Viability Study [SD31] raises the point that bungalows would lead to an increased land take, and hence may lead to a reduced capacity on a given land area. In relation to the latter point, the single storey homes referred to in policy H9 could be delivered as apartments as well as bungalows, thus reducing the land take.

### *Specialist accommodation for the elderly (use class C3)*

74. Policy H9 distinguishes between specialist purpose-built accommodation for the elderly (use class C3) and institutional housing such as care homes (use class C2). Specialist housing for older people is intended to enable people to remain living in their own homes independently for as long as possible, but is designed so that support can be provided. The 2015 SHMA [SD21] defines specialist retirement housing as "a form of congregate housing designed exclusively for older people, which usually offers some form of communal space, community alarm service and access to support and care if required" (paragraph 9.34 of SD21). Policy H9 requires 20% of the market and affordable housing mix on the Local Plan allocations to provide specialist purpose built accommodation for the elderly.
75. The Viability Study (2018 update) [SD35] considers specialist accommodation for the elderly at paragraphs 3.2.29 to 3.2.33. The study states that such accommodation "may or may not include an element of accommodation available for or supporting "assisted living" or similar, but in our view should be no less viable than market housing where they are commercial developments offering apartments or similar for market sale as the primary driver. In those cases the apartments would very often command premium level values as new-builds and they form part of the wide ranging provision within the spectrum of market housing" (paragraph 3.2.30 of SD35). Notwithstanding this, the study goes on to state that "there is no real experience to date of how the inclusion of such a mix works within sites other than the larger allocated sites of a few hundred homes or more" and the authors "suspect that viability and workability in a wider sense would be highly dependent on a range of factors starting with local demand / need for a particular type of specialist housing and / or care related provision and this may come down to a combination of practical matters rather than viability alone" (paragraph 3.2.32 of SD35).
76. Taking account of the Viability Study, the Council considers it is likely that the provision of 20% of the market and affordable housing mix on the Local Plan allocations as specialist purpose built accommodation for the elderly will be viable. The Viability Study does however cast some doubt (on the basis of a lack of experience of similar schemes to date) on whether such a mix would be practical on the smaller allocation sites at

Lytchett Matravers and Upton, and the smaller sites that form part of the Wool allocation.

77. Given the strong evidence of the need to provide appropriate accommodation for the elderly in Purbeck (as set out in the SHMA SD21), the Council considers it is appropriate to include the requirement for 20% specialist accommodation for the elderly in policy H8. The Viability Study indicates that such provision would be viable, but does raise some concerns about the practicality of such a requirement on the smaller allocated sites. Any issues of practicality can be dealt with at the planning application stage.

**Question 3**

**Are the Wareham and Bere Regis Neighbourhood Plans capable of making the allocations relied upon by policy V1 and H2 of the Local Plan?**

*Wareham Neighbourhood Plan*

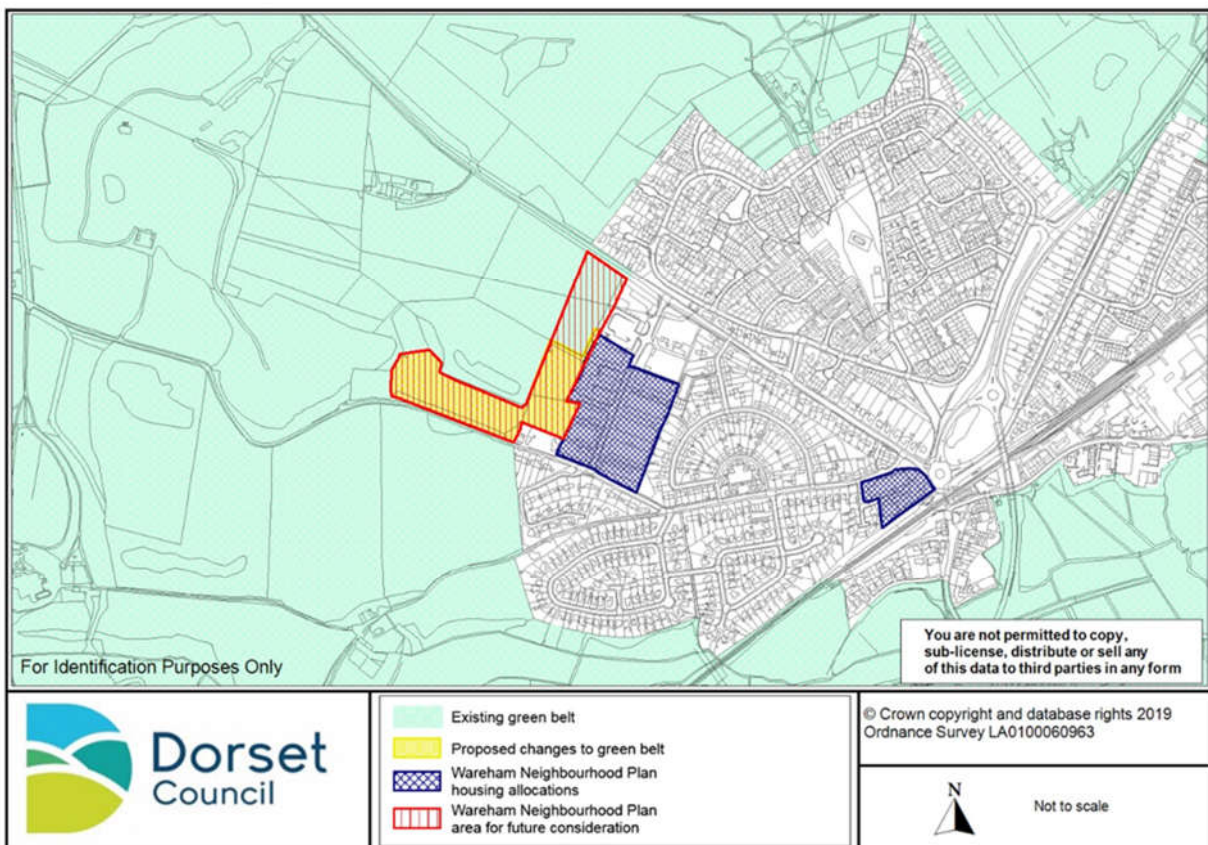
78. The Wareham Neighbourhood Plan is currently at examination. The submitted draft plan includes provision for 300 homes to come forward in Wareham over the period up to 2034, as summarised in table 4 below.

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
Cottes 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>	

Table 4: Potential housing delivery as identified in the draft Wareham Neighbourhood Plan



79. The draft Wareham Neighbourhood Plan includes proposed housing or mixed use site allocations for Westminster Road Industrial Estate, Johns Road Industrial Estate, the Hospital / Health Centre site, the Former Middle School site, the Cottes site (which now has planning permission for 9 homes<sup>5</sup>) and the Former Gasworks site.
80. The draft neighbourhood plan also identifies the potential for housing delivery in an area which is currently located in the Green Belt (West of Westminster Road, reference H4 in table 1 above). In accordance with paragraph 136 of the Framework, land in this area cannot be allocated for development in the neighbourhood plan unless the principle of changing Green Belt boundaries is established through strategic policies in the local plan. The Purbeck Local Plan is proposing to remove land from the Green Belt in this area, which will enable land to be allocated for housing in a future revision of the Wareham Neighbourhood Plan. It is worth noting that the area proposed for Green Belt release in the Purbeck Local Plan is smaller than the area identified as having potential for housing in the draft Wareham Neighbourhood Plan (Map 1) (see also Dorset Council’s response to Matter D). Dorset Council is confident that the land proposed for Green Belt release in the Purbeck Local Plan is of a sufficient size to accommodate 60 homes.



Map 1: Comparison of Wareham Neighbourhood Plan and Purbeck Local Plan areas identified on land west of Westminster Road.

<sup>5</sup> Planning application reference 6/2018/0611

81. During the course of the Wareham Neighbourhood Plan examination, it has emerged that there is currently some uncertainty about SANG provision to mitigate for homes to the north of the railway line (105 homes). The Council is committed to working with the Neighbourhood Plan group to resolve this matter. As a precaution, the Council is proposing to update the Purbeck Local Plan housing trajectory, so that homes to be provided through the Wareham Neighbourhood Plan allocations (other than the Cottes site which already has planning permission) are included from 2024/25 onwards, allowing time for the matter of SANG provision to be resolved (see the Council's response to Question 8 below).

### *Bere Regis Neighbourhood Plan*

82. The Bere Regis Neighbourhood Plan has passed referendum and is due to be 'made' by the Council in June 2019. Policy BR7 (Residential development) of the neighbourhood plan identifies sites to deliver 105 homes, as follows:
- a) Back Lane: Land extending to about 1.8 hectares (4.7 acres) to deliver approximately 55 homes;
  - b) North Street Housing: Land extending to about 0.6 hectares (1.48 acres) to deliver approximately 12 homes;
  - c) Tower Hill: Land extending to about 0.1 hectares (0.25 acres) to deliver 3 homes;
  - d) White Lovington: Land extending to about 1.0 hectares (2.5 acres) to deliver approximately 12 homes; and
  - e) Former School Site: Land extending to about 0.7 hectares (1.73 acres) to deliver approximately 23 homes.

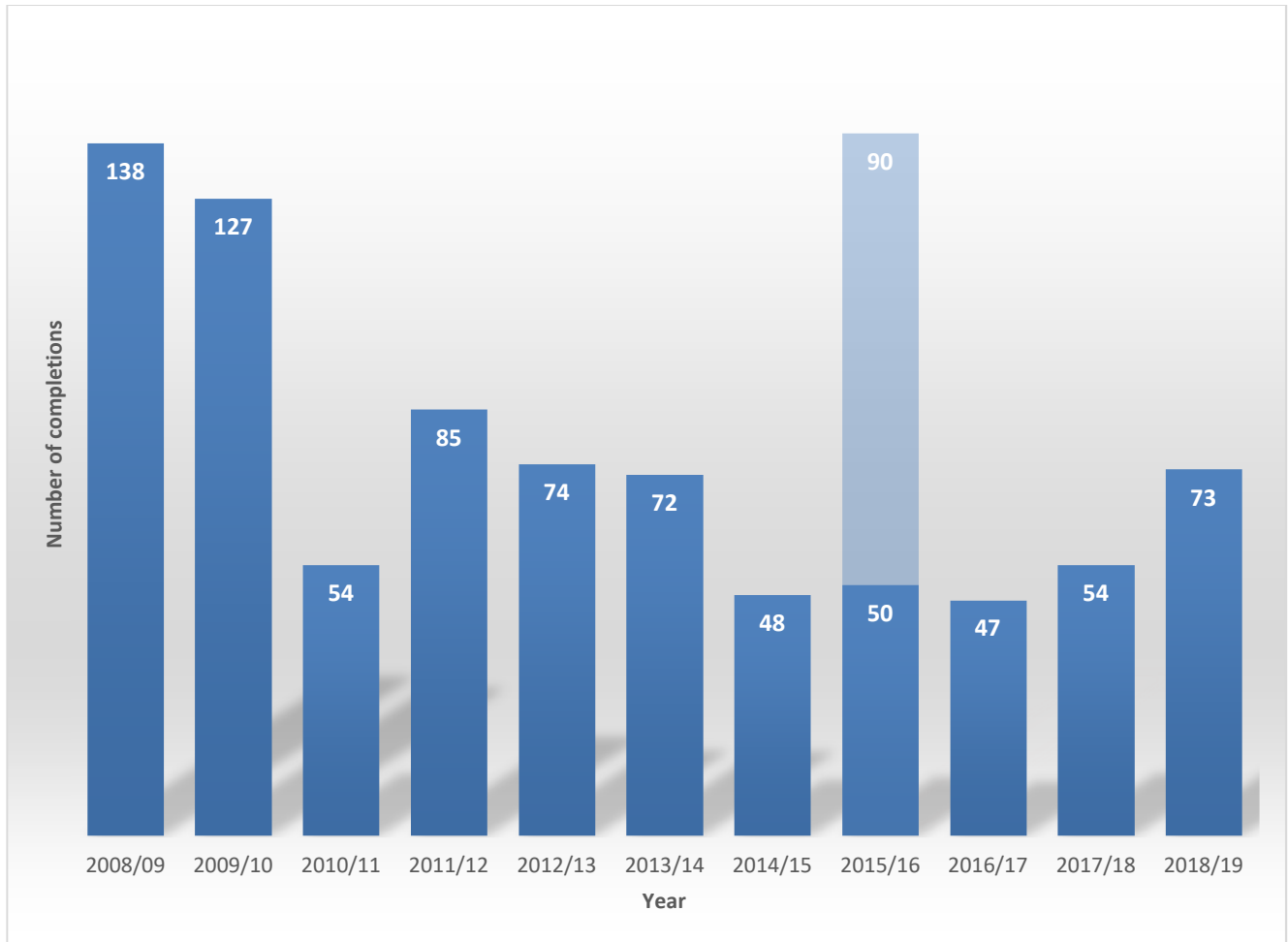
### **Question 4**

**Is there compelling evidence to indicate that 933 dwellings (35% of the housing land supply) will come forward from small sites next to existing settlements and windfall sites within existing settlements (except Wareham)?**

83. Yes. The Council considers that there is compelling evidence for this based on past windfall rates and the current availability of small sites next to existing settlements. The Housing Background Paper [SD19] sets out the Council's justification for this approach. In summary, the allowance for 933 homes to come forward through small sites and windfall (excluding Wareham) has been calculated as follows:
- a) Windfall allowance including Wareham: 46 homes per year x 16 years = 736 homes
  - b) Minus anticipated windfall in Wareham (75 homes) = 661 homes
  - c) Plus anticipated small sites development (17 homes per year x 16 = 272) = 933 homes

Windfall

84. The housing land supply identified in policy H2 includes an allowance for 46 dwellings per year to come forward as windfall (unplanned) development within existing settlements, including Wareham. As outlined in the Housing Background Paper [SD19], there is a long standing pattern of land becoming available for windfall development in Purbeck, which has led to relatively high and consistent levels of new planning permission being granted. Graph 1 below shows windfall completions in Purbeck between 2008 and 2019 (this has been updated since publication of the Housing Background Paper to include completions for 2018-19).



Graph 1: Windfall housing completions in Purbeck between 2008 and 2019<sup>6</sup>

85. Between April 2008 and March 2019, 912 homes have been completed on windfall sites. As shown in the graph above, there was a spike in 2015/16 due to a number of larger developments that will be discounted from the average trend calculation. On this basis, the average number of windfall homes over the past 11 years is 75 per year (from a total of 822). Since 2014/15 there has been a slight drop in the overall trend with an average of 54 units per year. It is possible that this a temporary dip, particularly

<sup>6</sup> Larger developments completed in 2015/16 discounted from annual trend ie. Pound Lane (21 sheltered apartments), Shore house (24 homes), Organford Manor Country Park (45 permanent residential static caravans)

as delivery improved in 2018-19, with 73 completions. However, it is important not to overestimate supply and take a reasoned and justified approach to inform the housing supply that will be identified in the Local Plan.

86. Paragraph 70 of the NPPF outlines the requirement to produce robust evidence on windfall potential if the allowance forms part of anticipated supply. Windfall in the area covered by Purbeck Local Plan indicates an annual average of 75 units per year. To ensure the windfall potential is robust, a reasoned allowance of up to 46 homes per annum has been included in the Purbeck Local Plan 2018-2034.

### *Windfall in Wareham*

87. The Wareham Neighbourhood Plan includes an allowance for windfall development within the overall figure of 300 homes. To avoid double-counting of windfall in Wareham, the Council has discounted the total anticipated windfall over the plan period by 75 homes, to account for likely windfall in Wareham.

### *Small sites next to existing settlements*

88. The Purbeck Local Plan includes policy H8 which supports the provision of homes on small sites next to existing settlements, providing that certain criteria are met. Paragraph 68 of the Framework includes a requirement for sites no larger than one hectare to accommodate at least 10% of a local authority's housing requirement. For Purbeck, with a housing requirement of 2,688 over the plan period, a minimum of 270 homes will be delivered on small sites. This is equivalent to an average delivery rate of 17 homes each year.
89. The proposed policy H8 is a new policy which will introduce greater flexibility for the provision of homes next to existing settlements, where they would not normally be permitted (other than as rural exception sites) under the current policy framework. Policy H8 has not yet been implemented, and there are therefore no past delivery rates to help inform the likely number of homes to be delivered under this policy. However, the Strategic Housing Land Availability Assessment (SHLAA) [SD22] provides details of small sites promoted in Purbeck, and assesses these on the basis of the proposed Policy H8. The first criteria of the policy is the key test in order to ascertain if the site is adjacent to existing dwellings in the closest town or village and if the proposed capacity is suitable for the location. If the site did not pass this test then it was classified as unsuitable for development in the current SHLAA although that is not to say that this cannot change in the future.
90. The SHLAA indicates that approximately 446 houses could potentially be delivered on suitable small sites. It should be noted however that sites which are deemed 'suitable' for development in the SHLAA will still need to be individually assessed when a planning application is submitted, taking account of all relevant planning policies and any other relevant material planning considerations. Notwithstanding this, the Council considers that it is reasonable to assume that approximately 270 homes could be delivered on small sites next to existing settlements over the plan period, which is equivalent to roughly 60% of the small sites housing potential identified in the current SHLAA.

### Question 5

**The housing background paper [SD19] indicates that the approach taken in the Plan not to allocate small sites but rather to include a small sites policy (policy H8) is intended to allow greater flexibility and deliverability of suitable housing.**

**Is this justified and is such an approach consistent with national policy as set out in paragraph 68 of the Framework?**

91. Yes. The Council considers that this approach is justified and consistent with national policy. Paragraph 68 of the Framework highlights the important contribution of small and medium sized sites to meeting housing requirements, with the benefit of relatively quick build rates in most cases. In explaining the overarching 'presumption in favour of sustainable development' which is at the heart of national planning policy, Paragraph 11 of the Framework sets out that plans should be sufficiently flexible to adapt to rapid change.
92. The Council believes that its proposed approach, (of not allocating small sites in the plan, but introducing a criteria-based policy instead), allows greater flexibility for small housing sites to come forward. If the Council had instead sought to allocate small housing sites, any such allocations would necessarily have been based on land availability at a point in time. This alternative approach would not have allowed for the possibility of further suitable sites being submitted to the Council at a later date. In addition, the Council believes that the introduction of a criteria-based policy for small sites will prove more effective in terms of delivery than would the alternative of allocating small sites in the plan. If the Council had followed the alternative approach, of allocating small sites, then any unforeseen issues arising in relation to specific small sites could have threatened the plan's overall housing supply.

### Question 6

**How has flexibility been provided in terms of the potential supply of housing land?**

93. The housing land supply includes an expectation that 933 homes will come forward at small sites next to existing settlements, and on windfall sites within existing settlements (excluding Wareham). This provides a significant element of flexibility in terms of where homes can be provided, and allows for homes to come forward both within and next to existing settlements, subject to meeting all relevant policy requirements.

### Question 7

**In order to identify all components that make up the housing land supply should the Plan identify completions since the start of the plan period and commitments (dwellings with planning permission, or with a resolution to grant permission subject to a planning obligation)?**

94. The Purbeck Local Plan was prepared in the context of emerging national policy and guidance in relation to the application of the standard method for calculating housing need. At the time of preparing the plan, the Council understood that planning permissions granted before September 2018 should not be counted as contributing

towards meeting the local housing need, as calculated using the standard method. As such, existing commitments (pre-September 2018) have not been included in the plan's housing land supply.

95. The Council published an updated five year housing land supply report for the Purbeck area in May 2019 [SD38a]. This report identifies that there were outstanding planning permissions for 502 homes as at 1 April 2019. All of these homes are expected to be delivered within the next five years (April 2019 to March 2024). Some of these homes are already accounted for in the housing trajectory on page 51 of the Purbeck Local Plan: this includes 111 homes on sites allocated in the Swanage Local Plan, and 9 homes on the Cottes site in Wareham (proposed to be allocated through the Wareham Neighbourhood Plan). This leaves 382 homes that had planning permission as at 1 April 2019, and which are not currently included in the housing land supply in the plan.
96. The five year housing land supply report [SD38a] also shows that 73 homes were completed in the Purbeck area between April 2018 and March 2019. The Council has prepared an updated housing trajectory (included in response to Question 8 below) which reflects the completions data for 2018-19.

### Question 8

**(a) Does the housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period?**

97. The Council is proposing to update the housing trajectory to reflect the latest available information, as detailed in response to Question 8(b) below. The Council considers that the updated housing trajectory demonstrates that the 2,688 homes provided for in the plan will come forward within the plan period, between 2018 and 2034.

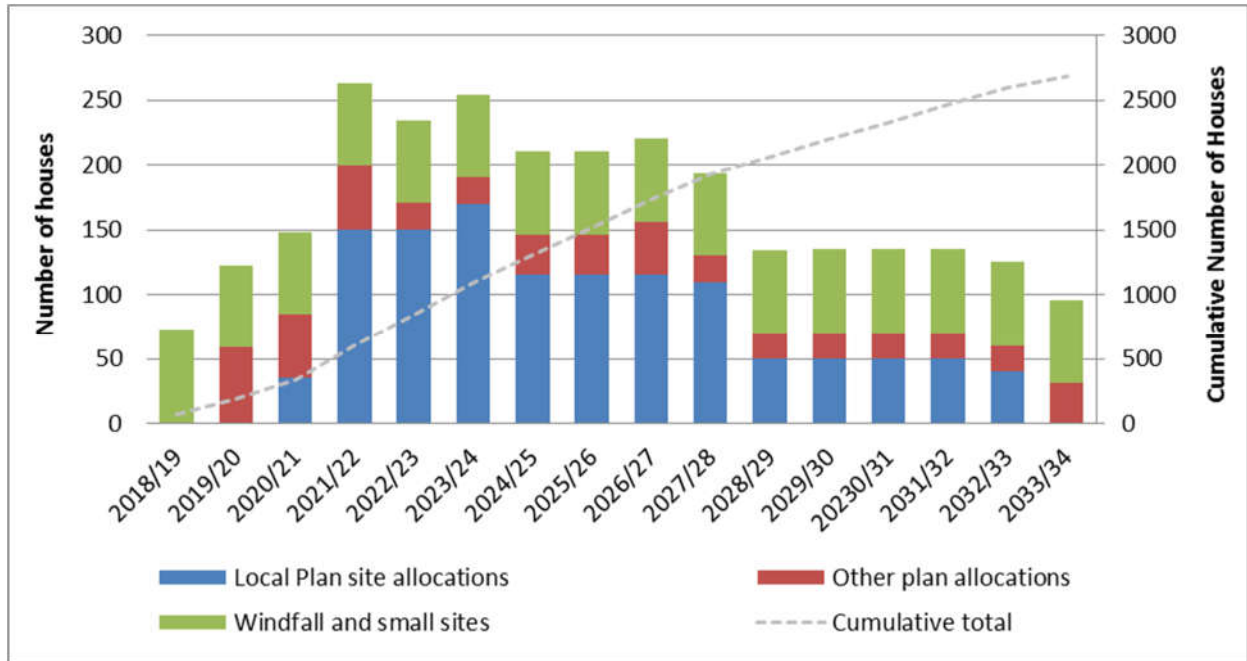
**(b) The change (MM4) indicated in the schedule of possible modifications [SD14] indicates the intention to update the housing trajectory graph to reflect the latest available information on delivery and phasing for allocated sites. What would be the effect of this? Is this necessary to ensure the Plan is sound?**

**NB. The Council is requested to address specifically the implications of this latest information on delivery and phasing for allocated sites.**

98. The Council has prepared an updated housing trajectory which is presented in Graph 2 below, with a detailed breakdown provided in appendix 1. The revised trajectory reflects the latest available information on likely housing delivery, and the Council considers that it is appropriate to update the plan to reflect this latest information.
99. In summary, the trajectory has been updated to take account of:
- completions data for 2018-19 (and consequential updates to the anticipated windfall and small sites delivery over the remaining plan period);
  - the latest available information on delivery and phasing for allocated sites, based on statements provided by each of the site promoters (and as agreed in the

Memorandums of Understanding for Wool, Moreton Station / Redbridge Pit; Lytchett Matravers; and Upton); and

- revised expectations for delivery of the housing sites identified in the Wareham neighbourhood plan (expected to deliver from 2024/25 onwards, with the exception of the Cottees site, which already has planning permission); and adjusting the total number of homes to be provided on sites allocated in the Wareham Neighbourhood Plan to 200 to align with the submitted draft neighbourhood plan.



Graph 2: Updated housing trajectory

100. In terms of delivery and phasing for the allocated sites, the differences between the trajectory in the Purbeck Local Plan submission version [SD01a] and the updated trajectory are shown in appendix 2. The changes can be summarised as follows:

- There is no change to the anticipated rate of delivery at Moreton Station / Redbridge Pit. Delivery on this site is still anticipated to begin in year 6 of the plan period (2023/24), with an average delivery of approximately 50 homes per year.
- Delivery at Wool is still anticipated to begin in 2020/21, but completion of the homes is now anticipated to take slightly longer (completion by 2027/28 instead of by 2026/27 as previously anticipated).
- Delivery at Upton and Lytchett Matravers is now anticipated to start later (in 2020/21 rather than in 2019/20 as previously anticipated). However, completion of these sites is still anticipated by 2023/24.

### Issue 3: 5 Year Housing Land Supply

#### Question 1

The Framework (paragraph 74) indicates that a five-year supply of deliverable housing sites, with the appropriate buffer can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement. Detailed advice on this process is set out in the PPG chapter Housing and Economic Land Availability Assessment 7 where it is described as ‘confirming’ the 5-year housing land supply.

The PPG indicates that if a Local Planning Authority wishes to use this process to confirm its five-year housing land supply it must indicate the intention to do so when publishing the plan for representations at Regulation 19 stage.

The Housing Background Paper [SD19] was published in October 2018 alongside the pre-submission draft of the Plan at Regulation 19 stage. It states that the five-year housing land supply will be demonstrated and tested through the examination process and then refreshed through an annual position statement.

In the light of this:

**(a) Is it robustly demonstrated that at adoption the Plan will deliver a 5-year housing land supply at adoption and that this can be maintained throughout the Plan period, calculated in accordance with national policy and guidance, taking account of past delivery performance and applying the appropriate 10% or 20% buffer?**

101. Yes. The five year housing land supply report [SD38a] published in May 2019 demonstrates a healthy supply of deliverable housing and contains a robust assessment of the deliverability of sites within the area covered by the Purbeck Local Plan. The report concludes that the Council can currently demonstrate a 6.8 year land supply.
102. The Council has requested that the five year land supply is confirmed as part of the local plan examination process and therefore applies the appropriate 10% buffer in accordance with paragraph 73 (b) of the NPPF.
103. The Housing Delivery Test results for the period 2015 – 2018 were published in February 2019. These results show that 132% of the required homes were delivered in Purbeck over the test period. As such, there is currently no requirement for the Council to include a 20% buffer when demonstrating the 5 year housing land supply.
104. Table 5 below outlines the projected delivery of housing throughout the plan period (as identified in the housing trajectory), to illustrate how housing delivery targets will be met, with a variance on target representative of a buffer. It is worth noting that table 6 does not include outstanding planning permissions. As of 1 April 2019, 382 homes which are not currently included in the housing land supply in the plan, had planning permission

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<sup>7</sup> PPG Reference ID: 3-049-20180913



(see the Council’s response to Issue 2, Question 7). This means that the Council’s land supply for years 1-6 of the plan period is actually considerably healthier than that shown in table 5, as demonstrated in the Five Year Housing Land Supply report [SD38a].

Development type	Year 1-6 (19/20 – 23/24)	Year 7-11 (24/25 – 28/29)	Year 12-16 (29/30 – 33/34)
Local plan allocations	505	505	190
Other plan allocations	201	143	111
Windfall and small sites	315	320	325
Completions (18/19)	73	n/a	n/a
<b>Total for period specified</b>	<b>1,094</b>	<b>968</b>	<b>626</b>
Cumulative target	1,008	1,848	2,688
<b>Cumulative total (variance on target)</b>	<b>1,094 (+9%)</b>	<b>2,062 (+12%)</b>	<b>2,688</b>

Table 5: Projected delivery of homes over the plan period (2018-2034)

**(b) What is the current position with regard to housing supply?**

105. The Council has a robust housing land supply. The Five Year Housing Land Supply report [SD38a] has been submitted as evidence and the Council would like to confirm this through the examination.

**(c) Is there a 5-year supply?**

106. There is currently a 6.8 year supply of housing in the area covered by the Purbeck Local Plan 2018-2034, as set out in the May 2019 Five Year Housing Land Supply report [SD38a].

**(d) How has this been calculated?**

107. The Five Year Housing Land Supply report updated May 2019 [SD38a] explains how the supply has been calculated.

## Issue 4 Other Housing Policies (Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15)

### Question 1

**(a) Are the specific requirements of policy H3 (New housing development requirements) justified, effective, likely to be viable and consistent with national policy?**

108. Yes. The Council considers that the specific requirements of Policy H3 are justified, effective, likely to be viable and consistent with national policy as:
- a) the requirements of policy H3 a. and e. reflect the statutory requirement for Councils to have regard to the desirability of achieving good design through the planning process (section 39 (2A) Planning and Compulsory Purchase Act 2004) and as specified in national policy (chapter 12, NPPF);
  - b) the size, type and tenure of housing required by H3 b. has been guided by the Strategic Housing Market Assessment 2015 [SD21] and is consistent with the requirements of national policy (paragraphs 61 to 64 of NPPF). The Council has considered whether the housing mix can be viably delivered [SD31 to SD37];
  - c) the requirements in H3 c. and d. are justified by the Habitats Regulations 2017, the Council's habitats regulations assessment [SD03] and are consistent with the requirements in national policy relating to habitats and biodiversity. The policy has been drafted in consultation with Natural England. As part of its viability appraisal the Council has considered whether appropriate habitat/biodiversity avoidance and mitigation measures can be viably delivered [SD31 to SD37];
  - d) the requirement of H3 f. to incorporate green spaces follows guidance in national policy regarding the need to explore opportunities for delivering multifunctional green infrastructure for use as open space/recreation and to manage/mitigate risks from flooding (paragraphs 96, 127 (e), NPPF). The amount and design standards (relating to the quality of open space) which the Council is seeking to provide follows best practice in Fields in Trust guidance;
  - e) the requirement of H3 g. for the provision of electric vehicle charging points follows guidance in national policy (paragraph 102 (b) of NPPF);
  - f) the requirement of H3 h. is consistent with the guidance in national policy relating to decision making (paragraph 108 (b) NPPF);
  - g) the requirement to identify and seek to retain important trees in H3 i. is consistent with national planning policy relating to planning policies contributing towards achieving good design and conservation/enhancement of the natural environment (paragraphs 170 (a) and (b) NPPF);
  - h) the requirement in H3 j. has been prepared in consultation with the local education authority and to address the requirements in national planning policy (paragraph 20.

- (c) NPPF and appendix 3 Council's IDP SD28 and taken into consideration in viability appraisals SD31 to SD37);
- i) the requirement of H3. k has been prepared taking into consideration relevant national planning policy/guidance relating to flood risk and achieving high standards of design. The Council's approach requiring suitable drainage schemes for major development is consistent with national planning and likely to be viable (as evidenced in viability assessment SD31 to SD37);
  - j) national planning policies require councils to identify and pursue opportunities for net gains in biodiversity. The requirement of H3 l are consistent with this objective and likely to be viable (as evidenced in viability assessment SD31 to SD37); and
  - k) the requirement of H3 m. is consistent with the guidance in national planning policy relating to the requirements for travel plans and transport statements (paragraph 111 NPPF).

**(b) Is the change to the policy (MM5) indicated in the schedule of possible modifications [SD14] necessary for the Plan to be sound?**

109. Yes, because of uncertainty over the costs of delivering improvements to electricity networks, (which may be required to support vehicle charging), the Council's estimate of the cost of delivering this infrastructure may require reconsideration. For these reasons the Council has suggested a more flexible approach to this requirement in MM5. Discussions on this issue also suggest that government is considering changes to building regulations, (to require delivery of charging point with new development), to address this matter<sup>8</sup>. The Council's suggested modification provides greater flexibility in addressing this matter.

**(c) Is the wording of the policy effective and sufficiently clear and precise for development management purposes having particular regard to paragraph 16 of the Framework?**

110. Subject to the changes to clause g. the Council is satisfied that there is sufficient viability from development on the allocated sites to meet the costs arising from compliance with this policy and other policies in the local plan. In the course of drafting the local plan the Council has consulted with key consultation bodies (including the Lead Local Flood Authority and Natural England) together with the land owners/site promoters and colleagues in the Council's development management team. It is satisfied that the policy, and its requirements, are clear and unambiguous for applicants and decision makers.

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<sup>8</sup> In October 2018 the Business, Energy and Industrial Strategy Committee published a report on electric vehicles. On the issue of charging infrastructure government responded to the committee suggesting that it planned to start a consultation on changes to 'building regulations to ensure that every new home has a charge point, where appropriate.' (<https://publications.parliament.uk/pa/cm201719/cmselect/cmbeis/1881/188102.htm> )

### Question 2

#### **(a) What is the relationship between policy H8 (Small sites next to existing settlements) and the principle of policy H12 (Rural exception sites)?**

111. The Council accepts that there is overlap between the remit of Policies H8 and H12 as both permit homes in the countryside around existing settlements. Despite this there are key differences between the policies relating to:
- a) *proximity to existing settlements* – Policy H8 requires ‘small sites’ to be adjacent to homes in the closest town or village, while Policy H12 provides more discretion permitting affordable housing in and around existing settlements;
  - b) *the tenure of homes* – any sites which may come forward under Policy H8 would need to be in accordance with policy H11 (affordable housing). For development sites with 10 homes or more, this would include requiring 40% new homes to be affordable. Policy H12 requires at least 70% of new homes on rural exception sites to be affordable or, where there is not viability to achieve this proportion, that the tenure of homes is ‘predominantly’ affordable;
  - c) *demonstrating that there is a justification for development* – in order to meet the requirements of clause a. of Policy H12 the Council has to be satisfied that the proposed homes on a rural exceptions site are capable of meeting an identified local need for affordable homes; and
  - d) *development in the green belt* – Policy H8 applies specific requirements in respect to the green belt, while Policy H12 relies on the exception provided in paragraph 145 (f) of the NPPF.

#### **(b) Are the two policies (H8 and H12) mutually compatible?**

112. The Council considers that the policies are compatible with one another as they serve different purposes. The Council decided to introduce Policy H8 as part of its strategy to provide flexibility in meeting the area’s housing requirement, as part of an approach to delivering growth across Purbeck and in order to provide an opportunity for small scale development to enhance/maintain the vitality of rural communities. Policy H8 sets out a permissive approach that will deliver small numbers of homes in appropriate locations and contribute towards meeting the area’s housing requirements, in line with national policy (NPPF, para 68 (a)).
113. Despite this contribution to its housing strategy the Council recognises that unplanned development on small sites across Purbeck will be necessarily limited by environmental designations (including those relating to European sites and landscapes) and planning policies (including those relating to flood risk and green belt). The Council anticipates that development sites which may be suitable as a rural exceptions site may not necessarily be suitable for small sites because of the contribution that delivering a significant number of affordable homes make towards meeting the areas affordable housing requirements. (Appendix 3 outlines cases where Planning Inspectors have assessed planning applications for rural exceptions sites in the Area of Outstanding Natural Beauty and given weight to the contribution that affordable homes will make to meeting local housing need in the decision making process).

114. In summary, the Council considers that Policies H8 and H12 are compatible with one another, each making an important contribution to the Council's strategy for meeting the area's housing requirements.

### Question 3

#### **(a) Would policy H8 apply in settlements covered by an existing Neighbourhood Plan that includes housing allocations and if so, what are the implications of this?**

115. Yes, Policy H8 would apply to settlements in neighbourhood plan areas with adopted neighbourhood plans which allocate land for new homes. Representors have argued that applying the policy in these areas would undermine:

- the local community's role in identifying suitable housing sites through the neighbourhood plan process;
- the plan led system where allocations for development are made through plans; and
- community support for neighbourhood planning.

116. The Council considers that the small sites policy will complement, rather than undermine, the neighbourhood planning process as:

- a) the small housing sites which the Council anticipates will be delivered are an important part of its strategy for achieving sustainable growth across Purbeck, and in particular provide an opportunity for sustaining and enhancing the vitality of rural communities. Restricting the policy from applying in areas with a made neighbourhood plan which allocates land for new homes would limit the policies contribution to achieving this objective;
- b) the policy will not prevent local communities from pro-actively identifying suitable sites as part of the process of preparing their own neighbourhood plans;
- c) local communities will continue to have the opportunity of positive engagement over the suitability of specific sites by making representations on planning applications; and
- d) the small sites permitted through the Council's policy will be limited to a maximum of 30 new homes, (the Council anticipates that the number of new homes permitted on each site will necessarily need to be adjusted to reflect local context and planning considerations), in suitable locations – preparing a neighbourhood plan will continue to give local communities greater discretion and opportunity to shape growth in their area.

### **(b) Would this be consistent with national policy?**

117. The Council considers Policy H8 is consistent with national planning policy. The Council introduced the small sites policy, as part of the 'New Homes for Purbeck' consultation that took place at the start of 2018. The policy (with limiting criteria) has been drafted to encourage sustainable patterns of development in suitable locations around existing towns and villages. This policy provides a flexible approach to supporting sustainable growth in towns and villages across Purbeck. The Council considers that Policy H8 is a strategic policy. It anticipates that homes delivered on small sites will support its overall strategy for a spread of new homes across Purbeck to meet its housing requirements.
118. The flexible approach to allowing growth in suitable locations is consistent with the requirements in national policy of seeking to deliver sustainable patterns of growth, whilst protecting important assets/areas, which sustain or enhance rural communities (reference paragraphs: 11, 78 and 79 of the NPPF).

### **Question 4**

#### **(a) Are the specific requirements of policy H8 justified?**

119. Yes, for the reasons outlined below the Council considers that the requirements of policy H8 are justified:
- a) The requirement for an association between small sites and an existing settlement will encourage sustainable patterns of growth which provide access and support to existing services/facilities. This requirement is also justified by national policy which states that planning policies should avoid the development of isolated homes in the countryside (paragraph 79 NPPF).
  - b) Clause a. (which imposes a requirement for proportionality in the scale of development permitted on small sites and imposes a limitation on the total number of homes permitted on each small sites) is justified in order to avoid development which damages Purbeck's sensitive and high quality natural/built environment and to encourage scales of growth that are sustainable.
  - c) Clause b. (which requires the scale/size/appearance homes on small sites to respect their settings) is justified by the objectives in national policy relating to design and the natural/historic environment.
  - d) Clause c. (relating to housing mix on small sites) is justified by the objectives in national policy relating to delivering homes needed by different groups (as evidenced in the Council's Strategic Housing Market Assessment 2015 SD21).
  - e) The requirement relating to small sites in the green belt reflects and elaborates on the interpretation of the term 'limited infilling' provided in national policy (paragraph 145 (e) NPPF).

**(b) Does the policy sufficiently provide for the cumulative impact of homes on small sites to be considered?**

120. Yes:

- a) clause b. of the policy explicitly invites the decision maker to take account of the cumulative impacts of small housing sites on the character of the surrounding area. Other environment policies (including those relating to landscape, historic environment and design) in the Council's local plan, and national planning policy, will implicitly require the cumulative impacts of small sites to be considered by the decision maker (the Council has also outlined its commitment to monitoring implementation and delivery of small sites); and
- b) where development is likely to have a significant effect (including cumulative effects) on European sites, supplementary planning documents provide a framework for avoiding or mitigating adverse effects. The Council uses contributions collected through the Community Infrastructure Levy to deliver the avoidance/mitigation measures on smaller sites – these measures include strategic SANG as identified in Policy I5 and strategic access management/monitoring. The Council recognises that it must monitor the effectiveness of avoidance/mitigation measures (delivered through CIL contributions) for addressing the effects from windfall development.

**(c) Is policy H8 consistent with national policy in relation to limited infilling in villages in the Green Belt? If not, would the change (MM7) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?**

121. The Council added the final requirement, relating to green belt, to the small sites policy to provide additional clarity and guidance on the term 'limited infilling' presented in national planning policy, as an exception to the presumptions relating to inappropriate development in the green belt. The Council recognises that this clause could potentially be misinterpreted as drafted in the submission draft plan [SD01a]. The Council therefore supports the suggested change (MM7) to policy H8 to clarify this and avoid the possibility for any confusion to arise.

**(d) Is the wording of policy H8 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?**

122. Yes, when the requirements of the policy are read in conjunction with the supporting text the Council is satisfied that decision makers will find it is clearly evident how the policy should be interpreted. The Council accepts that the policy does not provide a strictly prescriptive or mechanistic approach to the scale of development on small sites or suitable small sites. The Council has deliberately avoided this level of prescription because it would have limited the flexibility of the policy, the implementation of which will be a matter of planning judgement exercised on a case by case basis. The Council considers that the drafting of the policy provides an appropriate balance between flexibility which responds to the needs for growth across Purbeck and the limitations needed to ensure suitable and sustainable development. The Council does not consider that the policy is likely to create unnecessary confusion or uncertainty for decision makers, developers or local communities.

### Question 5

**(a) Does policy H9 (Housing mix) provide enough clarity on how development proposals will be assessed in terms of the type and mix of housing?**

123. Yes. The policy clearly states its aims and requirements. It states that it 'generally expects' new market housing to support the delivery of the requirements identified through the SHMA, and also sets out clear requirements for provision of self-build plots, single storey homes, and specialist accommodation for the elderly.
124. Development proposals will be assessed against the requirements and/or against evidence fully justifying where there is a 'significant economic viability' constraint that would not allow the requirements of the policy to be met.

**(b) Are the requirements of the policy particularly in relation to self-build plots and single storey homes justified by robust evidence, effective, likely to be viable and consistent with national policy?**

125. The NPPF (paragraph 61) stipulates that the tenure of housing needed for different groups in the community should be reflected in planning policies, this includes people wishing to commission or build their own homes, older people and people with disabilities.

#### *Self-build plots*

126. The area covered by the Purbeck Local Plan launched its Self-Build and Custom Housebuilding register in October 2015. In June 2018 there were 88 applicants on the self-build register, increasing from 31 eligible applicants in October 2016. As explained in the Council's response to Matter E, Issue 2, Question 2, the Council's Viability Study (2018 Update) [SD35] indicates that the provision of self-build plots is likely to be "at least neutral in viability terms".
127. Therefore, in accordance with national policy and in response to the apparent need as shown in the Council's register, the Council intends to support the delivery of self-build homes by working with landowners and developers to provide suitably serviced plots.

#### *Single storey homes*

128. The SHMA (2015) [SD21] identified the current and predicted population of elderly residents. Currently there is a higher percentage of elderly people within the population in Purbeck than in the south west region and England as a whole, as described in paragraph 154 of the local plan. The SHMA also highlights an estimated 72% increase in residents suffering from dementia and 58% increase in mobility problems. The SHMA explores the need for bungalows, however it does not specifically suggest how many are needed, as supply is largely dependent on the market. The Council has decided to ensure housing delivery can respond to these predicted demographic shifts by setting out the requirement for single storey homes, whilst allowing flexibility in terms of provision of bungalows or flats.
129. The 2016 Viability Study [SD31] includes testing of the impact of providing bungalows on a 20-unit scheme (paragraphs 3.11.8 to 3.11.11 of SD31), and concludes that the



viability impact is relatively marginal (see also the Council's response to Matter E, Issue 2, Question 2). The Viability Study [SD31] raises the point that bungalows would lead to an increased land take, and hence may lead to a reduced capacity on a given land area. However, as noted above, the single storey homes referred to in policy H9 could be delivered as apartments as well as bungalows, thus reducing the land take. The Council therefore considers that the provision of 10% single storey homes on sites delivering 20 or more units is likely to be viable.

**(c) Is the wording of policy H9 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?**

130. Yes. The Council has worked closely with development management colleagues to ensure all policies and their purposes are clear, effective and unambiguous. The Council has also worked closely with external and internal stakeholders. The policy clearly sets out that the Council will 'generally expect' new market housing to support the household requirements identified through the SHMA, and sets out clear requirements (as percentages) for sites of 20 or more units and housing site allocations in the Local Plan in relation to the provision of self-build plots, single storey homes, and specialist purpose built accommodation for the elderly.

### Question 6

**(a) Is policy H10 (Part M of the Building Regulations) justified, effective and consistent with national policy?**

131. Yes, the Council considers that the requirements relating to accessibility are:

- a) *justified* – the Council has carefully considered whether there is, (or is expected to be), a need for more accessible homes. The Council's Strategic Housing Market Assessment indicates that the population is notably ageing (there is a projected 23.9% increase in those aged over 55 years in Purbeck's population – Table 60 SD21) and that the proportion of the population with 'mobility problems' arising from health problems is also likely to increase (in Purbeck the Strategic Housing Market Assessment anticipates a 58.5% growth in the proportion of the population with mobility problems). Referencing the English Housing Survey 2012 – 13, the supporting text of the local plan (at paragraph 160) indicates that a significant proportion of Purbeck's existing housing stock does not incorporate 'visitability features' which contribute towards a building's accessibility. Taking these matters into consideration the Council is satisfied that the requirements in Policy H10 are justified;
- b) *effective* – subject to the suggested change described in response to Question 6 (c), the Council considers that the policy is likely to be effective. The Council appreciates that it is likely to be more costly to build homes which are more accessible, not only in terms of build costs, but also in terms of the increased land take. Viability evidence indicates that the optional technical standards of accessible and adaptable dwellings could be applied to 10% of dwellings on sites of over 10 units without impacting on overall viability (paragraph 3.2.22 SD35). Taking these matters into consideration the Council is satisfied that the requirements in Policy H10 are effective; and

- c) *consistent with national policy* – the Council considers that its approach to developing Policy H10 is consistent with national planning policy (paragraph 127 (f) and footnote 46 of the NPPF) and guidance (optional technical standards for accessible and adaptable housing).

**(b) In particular is the requirement of the policy for 10% of new homes on sites of 10 or more or a site area greater than 0.5 hectares to meet the optional technical standard of Category 2: accessible and adaptable homes justified and consistent with national policy?**

132. Yes, the Council considers that the proportion of homes required to comply with 'accessible and adaptable' design standards on large sites (i.e. for over 10 new homes or with a site area greater than 0.5 hectares) are:
- a) *justified by evidence on development viability* - the Council recognises the need for accessible homes (as outlined above), the proportion of 'accessible and adaptable dwellings' (Building Regulation M4 (2)) required on major residential development are supported by viability assessments that the Council has carried out throughout the plan making process. SD31 (April 2016) suggests that the collective costs arising from policy requirements in the local plan (including those relating to affordable housing policy H11) would need to be adjusted if the Council sought houses designed to meet 'wheelchair user' standards (Building Regulation M4 (3)) (paragraph 3.11.2 SD31). The viability evidence suggests that a proportion (10%) of homes designated to meet 'accessible and adaptable dwellings' standards could be viably delivered along with the requirements of other policies in the local plan (paragraph 3.11.2 SD31 and 3.2.22 SD35); and
- b) *consistent with national planning policy* - the Council's policy specifically refers to the optional technical requirements defined in buildings regulations, has been based on evidence gathered for its housing needs assessment and takes account of the policy requirement's 'overall' (with other policies on the local plan) impacts on development viability.

**(c) Is the policy capable of being deliverable in all cases except where there are viability considerations?**

133. The Council recognises that the requirements of Policy H10 may not be deliverable in all cases and that the policy needs to be modified so that it refers to site specific factors (including: flooding and landform) which may exceptionally make it impossible or unviable to meet the design standards for 'accessible and adaptable' homes (M4 (2)). In order to address this matter the Council suggests a modification to Policy H10 (MM24).
134. The Council suggests the following insertions/deletions to the last paragraph of Policy H10: 'If an applicant considers there are site specific **considerations** (including: landform or flood risk) or other planning policy (including those relating to heritage assets or designated landscapes) considerations that mean they are unable to provide the proportion of accessible and adaptable homes identified in this policy, the Council expects applicants to evidence this through a statement submitted **a financial viability appraisal** with their planning application. Where necessary the applicant will be

expected to fund the independent verification of the submitted **viability assessment statement** by a person appointed by the Council.'

### Question 7

**Are the requirements of policy H11 (Affordable Housing) justified by robust evidence, effective, likely to be viable and consistent with national policy including in respect of the threshold for the provision of affordable housing?**

135. A full assessment of affordable housing need was carried out in the Eastern Dorset SHMA (2015) [SD21], with some variables updated in the Purbeck SHMA update (2018) [SD20]. The NPPF introduced an updated definition of affordable housing and households with an affordable need. Essentially, the new definition includes households who can afford to rent privately but not afford to buy, with solutions including Starter Homes and Discounted Market Sales Housing. The SHMA update sets out an analysis of affordable home ownership price points to help ensure that homes are genuinely affordable.
136. The Eastern Dorset SHMA and the update for Purbeck, conclude that the overall net affordable housing requirement for Purbeck would be 149 affordable homes per year. Even allowing for the 42% affordability uplift apportioned to the District's local housing need assessment, this is almost 90% of the identified housing requirement. The Council's Viability Study [SD31-37] has considered the potential impacts of affordable housing provision upon the economic viability of development.
137. The latest 2018 Viability Study [SD35-37] advised that the affordable housing requirement percentage should be reduced to facilitate viable development opportunity. It was also recommended that the levels of affordable housing should apply across the plan area and therefore that the distinction between north and south Purbeck is no longer necessary. There is an important balance to maintain between maximising affordable housing provision, whilst also ensuring that development is viable and successfully comes forward. For sites of 10 units or more (or more than 0.5 hectares inside settlement limits), 40% affordable housing should be provided on greenfield land and 30% on previously developed brownfield land. This was derived from the 2018 viability assessment recommendations and hence revises the policy position taken at the time of the 2016 options consultation.
138. It has been well recognised that affordable housing is a key issue within the Purbeck area. The NPPF (paragraph 63) advises that affordable housing should only be sought for developments under 10 units (i.e not a major development) in designated rural areas, where a lower threshold may be set. Policy H11 therefore requires an affordable housing contribution from developments between 2 and 9 homes in designated rural areas.
139. The NPPF recommends that at least 10% of homes should be available for affordable home ownership as part of the overall affordable housing contribution and the SHMA update does not recommend seeking any more than this. For sites with 40% overall provision, this equates to 25% affordable home ownership and for 30% overall, is equivalent to 34% affordable home ownership. For example, on a greenfield site for proposed 100 dwelling, 40 should be affordable overall with 10 affordable home

ownership, 4 social rented and 26 affordable rented. Policy H11 requires a mix of affordable housing provision in line with these proportions.

### Question 8

#### **Is policy H12 (Rural exception sites) justified, effective and consistent with national policy?**

140. Yes, the Council considers that Policy H12 is:

- a) *justified* – as context for Policy H12 the Council's Strategic Housing Market Assessment Update 2018 [SD20] and 2015 assessment [SD21] evidence that there is a need for affordable homes in Purbeck (paragraph 164 Purbeck Local Plan 2018-2034). Clause a. of policy H12 requires the need for affordable homes to be evaluated on an individual, case by case basis and evidenced through the planning application;
- b) *effective* – the Council's viability report (paragraph 3.9.4 SD31) indicates that rural exceptions sites are not likely to be brought forward unless between 30% and 40% homes are available on the open market. The final requirement in the Council's policy reflects this evidence and i) indicates that the proportion of market housing will need to be individually evidenced if it exceeds 30%, and ii) that the Council will take a decision as to whether the balance between affordable and market homes is appropriate; and
- c) *consistent with national policy* – the Council's policy is consistent with national planning policy which suggests that councils should support opportunities to bring forward affordable housing on rural exception sites, including 'some' market homes where this would facilitate development. Clauses b. and c. of Policy H12 encourage sustainable patterns of growth which support local services and facilities, and well-designed places. The requirements in these clauses are also consistent with national planning policy.

### Question 9

#### **Is policy H13 (Rural workers homes in the countryside) justified, effective and consistent with national policy? Is the definition of a rural worker set out in the supporting text (paragraph 180) justified?**

141. Yes, the Council considers that Policy H13 is:

- a) *justified* – national planning policy states (paragraph 79 NPPF) that councils may permit 'isolated' new homes in the countryside, in exception to a general presumption against this form of development, if they are for a rural worker. Since 1 January 2012 the Council has determined 9 planning applications relating to agricultural works homes/conditions imposed to limit the occupation of agricultural workers homes<sup>9</sup>. Clauses a. to d. of Policy H13 provide clarification to decision

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<sup>9</sup> Reference planning applications: 6/2012/0378, 6/2012/0536, 6/2013/0141, 6/2016/0455, 6/2017/0341, 6/2017/0483, 6/2018/0358, 6/2018/0372 and 6/2018/0666.

takers when assessing planning applications for rural workers homes including essential need for resident worker to allow the business to function;

- b) *effective* – the Council’s policy requires applicants to demonstrate that the rural business, which supports the functional need for a rural workers home, is economically viable;
- c) *consistent with national policy* - the Council is satisfied that the requirements in clauses a. to f. of the Policy H13 are consistent with the objectives of national planning policy relating to isolated new homes in the countryside and in supporting a prosperous rural economy (paragraphs 79 and 83 NPPF).

142. The Council considers that it is necessary to define the term ‘rural worker’ for the decision maker when assessing planning applications against the Policy H13. National policy encourages councils to support growth and expansion of all types of business in rural areas (paragraph 83 (a) and (b) NPPF). Having regard to national policy relating to the rural economy, together with the guidance on isolated homes in the countryside, the Council is satisfied that its definition of ‘rural worker’ (that is necessarily linked to businesses that either have an intrinsic connection with rural land based activities or need to be located in the countryside: ‘people employed in an existing, or proposed rural business, including those taking majority control in a farm business’ paragraph 180 Purbeck Local Plan) properly reflects the intentions of national policy.

### Question 10

**(a) Is policy H14 (Second homes) which seeks to restrict all new housing in the AONB, on small sites (as set out in policy H8) and on rural exception sites (as set out in policy H12) to homes that are occupied as a principal residence justified, effective and consistent with national policy?**

143. Yes the Council considers that Policy H14 is:

- a) *justified* – the Council’s second homes evidence paper [SD23] references the evidence (including council tax records, electoral role and ‘local knowledge’) on the proportions of homes that are occupied as ‘second homes’ in Purbeck. The Council’s evidence (including anecdotal evidence from local communities) suggests that where the proportion of housing stock occupied as second homes is high: i) the demand for further second homes may inflate house prices and affect affordability, ii) fewer homes will be available to people wishing to live and work in the Purbeck (negating the benefits that full time residents make to local communities), and iii) the occupiers of second homes are not likely to make the same overall positive contribution to enhancing/sustaining rural communities; and
- b) *effective* - the Council has carried out comparative analysis of the effects on land values in areas where restrictive conditions (which limit how new homes can be occupied) are being imposed in order to develop assumptions on the likely effects of the policy on the market value of new homes. It has then taken these assumptions into account in a viability assessment which takes account of costs

arising from the local plan as a whole). The Council's evidence<sup>10</sup> (indicates that a condition limiting occupation of new homes to 'principal residence' is not likely to have a significant effect on the viability of development or require it to reconsider its approach to costs arising from other policies in the local plan.

144. The Council also considers that Policy H14 is consistent with national policy. National policy does not prohibit councils from introducing a restrictive policy to limit how new homes can be occupied. The Council does not consider that Policy H14 will undermine other policies/development strategies in the Purbeck Local Plan or national policy. In particular, the Council does not consider that Policy H14 is likely to compromise its ability to meet Purbeck's housing requirement, undermine sustainable patterns of growth or have a damaging effect on the housing market by distorting the price of unrestricted homes in the existing housing stock relative to new homes where the limitation on occupation has been applied. The Council considers that the limitation on the occupation of new homes in the AONB, on small sites and rural exception sites is likely to contribute towards supporting strong and vibrant rural communities by making homes available for continuous occupation as a 'principal residence'.

**(b) Is the definition of a principal residence in the supporting text (paragraph 185) justified?**

145. Yes, the Council's approach to defining principal residence is justified by a consideration of the effects of applying a limitation on the occupation of new homes in the AONB and new homes on small sites/rural exception sites. Using available evidence, the Council has sought to consider the potential direct, and indirect, implications of narrow and wider definitions of 'principal residence' and achieve an appropriate balance between: achieving expected social and economic benefits for local communities/the housing market and avoiding potentially damaging effects on the local economy.
146. The supporting text in the Council's local plan (paragraph 187) states that new dwelling houses used as holiday lets should not be treated as second homes. The Council recognises the contribution that holiday homes make to the tourist economy (both directly and indirectly). The Council's position is supported by evidence presented in paragraphs 79 to 85 of its evidence paper SD23). In order to support the objectives of Policy H14 the Council states that it will impose a condition on holiday lets to limit their occupation in order to avoid a subsequent change in occupation to a second home.
147. Neither does the Council's policy disadvantage dwelling houses that are built or purchased for letting, provided tenants who occupy a dwelling do so as their principal residence.

**(c) Is the amendment to the definition of a principal residence (MM8) indicated in the schedule of possible modifications [SD14] necessary for the plan to be sound?**

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<sup>10</sup> The Second Homes Policy Impacts Study 2017 was published as part of the New Homes for Purbeck consultation, and is available via: [www.dorsetcouncil.gov.uk/purbeck-local-plan-consultations](http://www.dorsetcouncil.gov.uk/purbeck-local-plan-consultations)

148. Yes, to ensure effective enforcement (as required by paragraph 58 of the NPPF) the Council considered that it was necessary to insert the clarifying statement to the definition of principal residence in relation to homes occupied by military personnel.

### Question 11

**The housing background paper [SD19] indicates that there is a need for two additional pitches for gypsy and travellers (who meet the current planning definition). It also indicates that there is a need for four plots for travelling showpeople.**

**The Local Plan does not make any allocations to meet the accommodation needs for gypsies and travellers or travelling showpeople but rather it proposes a criteria-based policy (Policy H15) (Meeting the needs of gypsy, traveller and travelling show people) for delivering pitches and plots on suitable sites which it indicates is intended to support delivery of a joint gypsy and traveller development plan document (DPD) that is being prepared with other Dorset Councils.**

#### **(a) Does the approach set out in policy H15 conform with the expectations of the Planning Policy for Traveller Sites (August 2015)?**

149. Dorset councils treated the requirement for traveller sites across the county as a strategic matter. The councils have sought to apply the approach described in national policy by:

- assessing the need for traveller sites (the councils jointly prepared accommodation assessments (dated 2013<sup>11</sup> and 2017<sup>12</sup>); and
- identifying suitable sites (the councils have undertaken jointly prepared consultations on sites allocations (undertaken in 2011/2012<sup>13</sup> and 2014/2015<sup>14</sup>)).

150. The Dorset councils have worked together actively on an ongoing basis, with the original objective being to prepare a traveller development plan document for Dorset. It became apparent that the joint traveller DPD would not be ready for publication at the same time (or shortly after) the Council's local plan. As a consequence the Council considered that it needed to adopt pragmatic approach which:

- a) reflected the assessed need for traveller sites in Purbeck;

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<sup>11</sup> Bournemouth, Dorset and Poole Gypsy and Traveller and Travelling Showpeople Accommodation Assessment, 2013, available via: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/joint-planning-policy-work/dorset-wide-joint-plan/background-information-and-needs-assessment.aspx>

<sup>12</sup> Bournemouth, Christchurch, East Dorset, North Dorset, Poole, Purbeck, West Dorset and Weymouth & Portland Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, available via: <https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/PlanningPolicyFiles/GypsiesTravellers/2017-10-20-dorset-gtaa-final-report.pdf>

<sup>13</sup> Further information is available online at: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/joint-planning-policy-work/dorset-wide-joint-plan/first-stage-consultation-and-assessment-of-sites.aspx>

<sup>14</sup> Further information is available online at: <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/joint-planning-policy-work/dorset-wide-joint-plan/dorset-wide-gypsy-and-traveller-including-travelling-showpeople-joint-development-plan-document.aspx>

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- b) took account of the work around identifying suitable sites in Purbeck; and
- c) provided an opportunity for traveller sites to be delivered in Purbeck.

151. Where there is no need for traveller sites, national policy states that councils should include a criteria based policy in order to provide a basis for considering any planning applications which may come forward. The Council acknowledges that there is a need for traveller sites in Purbeck and, after taking account of local circumstances, it considers that policy H15 provides the best opportunity for addressing the requirement because of the difficulties of identifying traveller sites (the joint consultations did not identify any suitable or available land for traveller sites in Purbeck), the lack of any opportunity for expanding existing public/private sites, (existing sites are heavily constrained because of their relationship with European sites), and the limited requirement for additional traveller sites in Purbeck.

**(b) What is the status of the proposed DPD and how does it relate to the wider plan intended for the new unitary authority, within which the area covered by the Purbeck Local Plan falls?**

152. Work on the joint DPD was paused in advance of local government reorganisation in Dorset (the new unitary authorities were formed on 1 April 2019). 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.

### Question 12

**What provision is made in the Plan for the housing needs of people who are no longer included in the planning definition of gypsies, travellers and travelling showpeople?**

153. The Council is committed to meeting all housing needs, including the needs of gypsies and travellers who are no longer included in the planning definition. The Council has sought to identify suitable sites during the Regulation 18 'issues and options consultation' as part of the Dorset Gypsy and Traveller Site Allocations DPD (this consultation was carried out in the context of planning to meet the accommodation requirements for gypsies, traveller and travelling show people before changes to the planning definition of gypsies, travellers and travelling show people in 2015).

154. The most recent 2017 accommodation assessment (which applies the current planning definition of gypsies, travellers and travelling showpeople) identifies that there is a need to provide 9 pitches for gypsies and travellers by 2033 to meet the needs of those people who are now excluded from the planning definition. These requirements have been taken into consideration when calculating the local housing need for the area (appendix 4). Despite the Council not being able to identify any suitable sites to meet this requirement through the Purbeck Local Plan it intends to:

- a) explore opportunities for identifying sites for gypsies, travellers and travelling showpeople who are now excluded from the planning definition as part of work on the Dorset Council's local plan; and
- b) consider planning applications for this development on their merits.



**Question 13**

**Is the Plan positively prepared, justified, effective and consistent with national policy in respect of meeting the accommodation needs of gypsies and travellers and travelling showpeople?**

155. Yes, the Council's strategy is:

- a) *positively prepared* – the Council has assessed the accommodation needs for traveller sites in Purbeck, (applying the updated planning definition of gypsies, travellers and travelling show people), explored the opportunities for allocating land for traveller sites and prepared a criteria based policy which provides the opportunity for this need to be addressed;
- b) *justified* – the Council's strategy has been guided by an accommodation assessment and appropriate consultations. The Council has also explored the opportunities for addressing the requirement for further traveller sites through expansion of existing public and private sites and the regularisation of unauthorised sites, neither of these alternatives led to the Council identifying suitable or available sites; and
- c) *effective* - the Council will closely monitor the effectiveness of Policy H15 over the plan period and seek to address the requirement for traveller sites across Dorset Council through its new local plan/separate DPD or a jointly prepared DPD with Bournemouth, Christchurch and Poole Council.

156. Despite actively working to identify suitable sites the Council has not been able to allocate any additional traveller sites or pitches through its local plan in accordance with national policy. The Council considers that its approach to addressing this matter is reasonable given circumstances in Purbeck.

## Appendix 1 - Detailed housing trajectory

		2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	20230 /31	2031/ 32	2032/ 33	2033/ 34
Moreton Station / Redbridge Pit	490						50	50	50	50	50	50	50	50	50	40	
Wool	470			20	65	65	65	65	65	65	60						
Upton/Lytchett Matravers	240			15	85	85	55										
Local Plan site allocations	1200	0	0	35	150	150	170	115	115	115	110	50	50	50	50	40	0
Wareham	200		9					10	10	20	20	20	20	20	20	20	31
Bere Regis	105					21	21	21	21	21							
Swanage	150		50	50	50												
Other plan allocations	455	0	59	50	50	21	21	31	31	41	20	20	20	20	20	20	31
Small sites	268	0	17	17	17	17	17	18	18	18	18	18	19	19	19	19	19
Windfall	765	73	46	46	46	46	46	46	46	46	46	46	46	46	46	46	46
Windfall and small sites	1033	73	63	63	63	63	63	64	64	64	64	64	65	65	65	65	65
	2688	73	122	148	263	234	254	210	210	220	194	134	135	135	135	125	96
		2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	20230 /31	2031/ 32	2032/ 33	2033/ 34
Local Plan site allocations	1200	0	0	35	150	150	170	115	115	115	110	50	50	50	50	40	0
Other plan allocations	455	0	59	50	50	21	21	31	31	41	20	20	20	20	20	20	31
Windfall and small sites	1033	73	63	63	63	63	63	64	64	64	64	64	65	65	65	65	65
Cumulative total		73	195	343	606	840	1094	1304	1514	1734	1928	2062	2197	2332	2467	2592	2688
Cumulative Target		168	336	504	672	840	1008	1176	1344	1512	1680	1848	2016	2184	2352	2520	2688

## Appendix 2 - Comparison of previous and updated housing trajectories for site allocations

		201 8/19	201 9/20	202 0/21	202 1/22	202 2/23	202 3/24	202 4/25	202 5/26	202 6/27	202 7/28	202 8/29	202 9/30	2023 0/31	203 1/32	203 2/33	203 3/34
Moreton Station / Redbridge Pit – trajectory in submitted local plan	490						50	50	50	50	50	50	50	50	50	40	
Moreton Station / Redbridge Pit – updated trajectory	490						50	50	50	50	50	50	50	50	50	40	
Wool - trajectory in submitted local plan	470			20	75	75	75	75	75	75							
Wool – updated trajectory	470			20	65	65	65	65	65	65	60						
Upton/Lytchett Matravers – trajectory in submitted local plan	240		48	48	48	48	48										
Upton/Lytchett Matravers – updated trajectory	240			15	85	85	55										

## **Appendix 3 – Planning appeals relating to rural exceptions sites in Purbeck**



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## Appeal Decision

Site visit made on 30 September 2015

**by Andrew Dawe BSc(Hons) MSc MPhil MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 23 November 2015

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**Appeal Ref: APP/B1225/W/15/3028988**

**Land adj Abbascombe Cottages, Worth Matravers, Swanage, Dorset  
BH19 3LG**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Mr Mark Parsons against the decision of Purbeck District Council.
  - The application Ref 6/2014/0599, dated 11 November 2014, was refused by notice dated 30 January 2015.
  - The development proposed is construction of 9 affordable dwellings, associated car parking and car ports.
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### Decision

1. The appeal is dismissed.

### Main Issues

2. The main issues are:
  - i) the effect of the proposed development on the character and appearance of the Dorset Area of Outstanding Natural Beauty (the AONB);
  - ii) whether the proposed development would comply with national and local policies relating to development in the countryside.

### Reasons

#### *Character and appearance of AONB*

3. The site is a field in a prominent and fairly elevated position on the edge of the village of Worth Matravers just beyond the existing settlement boundary. The village is generally located within a small incised valley. There are fields to the north-east and south-west of the site with the coastline visible to the south. It is within the Limestone Plateau character area as defined in the Landscape Character Assessment & Management Guidance for the AONB. That document identifies that pressures for new residential development are threatening the distinctiveness of settlement patterns which impact on the open character of the landscape, and that there is also likely to be further pressure for some new built development on the fringes of larger villages.
4. The National Planning Policy Framework (the Framework), in paragraph 115, states that with regard to AONBs great weight should be given to conserving the landscape and scenic beauty of these areas.

5. Policies CO and LHH of the Purbeck Local Plan Part 1 (the Local Plan) together, in respect of this issue, state that development in the countryside should aim to make a positive contribution to landscape character; and proposals for development will be expected to conserve the appearance, setting, character, interest, integrity, health and vitality of landscape and heritage assets.
6. The approach to the village from the north-east, along both the road and the footpath known as Priests Way, has a strong open character representative of the Limestone Plateau character area generally. There are currently also clear views of the coastline and sea from those vantage points. The proposed development would infringe on the openness of this countryside location and obscure and reduce the extent of the coastal views to varying degrees. As such it would have some negative impact in this respect.
7. However, from the road directly in front of the site, the views would still be likely to be glimpsed through the spaces between the buildings, and from further along the road to the north-east and from Priests Way a substantial amount of the coastline would remain visible. Furthermore, in the context of other remaining views of the coast from the village, including particularly good views from the stretch of road to the south-west of Abbascombe Cottages, the overall impact in this respect would not be substantial.
8. On the approach to the site along the road from the north-east, the proposed houses would largely be seen in the context of just Abbascombe Cottages with little or no inter-visibility with the rest of the village. They would therefore represent a further expansion of the village out of the valley and the development as a whole would also have a greater density than that of Abbascombe Cottages. That would be reflected by the narrower frontages to each of the front facing terraced dwellings, the single storey units at plots 2 and 3 projecting back from the road, and the fairly substantial rear parking area.
9. As such the site would appear more compact and less open than the context provided by the existing adjacent properties and also when compared to the wider frontages of those nearest dwellings in Newfoundland Close opposite. The dwellings at plots 2 and 3 would however only be single storey, lessening their prominence, and the rear parking area would be significantly screened by all of the proposed dwellings.
10. Despite the above differences, and even though I understand from the Council that Abbascombe Cottages were built prior to the AONB designation, their presence would ensure that the addition of those proposed would not appear as completely alien features. Furthermore, the drop in levels beyond the existing cottages is apparent and so the proposal, as is the case with those existing cottages, would be perceived to some extent in the context of a degree of expectation that they would lead into and mark the start of the village settlement.
11. Closer to the site and from Priests Way they would also be seen in the context of those other nearby dwellings in Newfoundland Close on the opposite side of the road from Abbascombe Cottages. The presence of a substantial barn immediately to the north-east of the site on the opposite side of the road also provides some existing built form alternative context to the open countryside in this vicinity, which would further lessen the impact of the proposal to a degree.

12. Coming up the road out of the village, the end existing cottage and the dwelling opposite form a clear and distinct built edge to the settlement and the proposed dwellings would be seen prominently in a fairly raised position beyond that. However, those nearest to the existing cottages would be designed with the second storey partly within the roofspace, complementing Abbascombe Cottages in this respect.
13. The two storey terraced units in particular would primarily have a rough cast rendered finish as opposed to the more traditional use of stone found on those adjacent existing dwellings and most of those in the vicinity. This would weaken the appearance of those units in the context of the nearby dwellings and the village generally. However, there would be some reference to the traditional use of stone in the quoin features. Furthermore, those units would be contained well away from the site's north-east boundary, framed to some degree by the stone building proposed at plot 1.
14. The single storey height of the units at plots 1 to 3 would also provide a fairly low-key transition between the open countryside and the rest of the development. This would be helped by the proposed timber cladding and lack of openings on the long rear elevation relating to plots 2 and 3 which, to a degree, would enable it to tone it into the adjacent countryside setting and give it the appearance of an agricultural type building. As such, and given the significant degree of separation from the older buildings in the core of the village, the proposed buildings would not stand out as unacceptably jarring or obtrusive features and would sufficiently assimilate into the existing settlement.
15. From public vantage points on the footpaths and open space to the south of the site, the proposed development would be seen as a relatively small continuation of the existing settlement without impinging on any significant views and also in the context of the built form of the nearby existing barn.
16. The proposed development would therefore have some mitigating factors in its favour with regard to its effect on the character and appearance of the AONB. However, I have also found that there would be some negative effects, taking account of the great weight that is required to be applied to conserving the landscape and scenic beauty of the AONB. In this respect, I have also had regard to Management Policies PH1a, PH1d, PH1g and PH2b of the AONB Management Plan 2014-2019: A Framework for the Future to which I have applied substantial weight due to its up-to-date role in supporting the relevant Local Plan policies.
17. Those Management Plan policies together seek to ensure that any necessary development affecting the AONB is sensitively sited and designed and conserves and enhances local character; promote the use of high quality design, materials and standards of workmanship in all developments in the AONB; conserve and enhance the AONB's undeveloped rural character, panoramic views, tranquillity, remoteness and wildness; and protect the quality of uninterrupted panoramic views into, within and out of the AONB.
18. For the above reasons, the proposed development would have an adverse impact on the character and appearance of the AONB. As such, and before consideration of any potentially exceptional circumstances, it would be contrary to Policies CO and LHH of the Local Plan and paragraph 115 of the Framework.

*Development in the countryside*

19. Policy LD of the Local Plan states that development will be directed towards the most sustainable locations in accordance with the defined settlement hierarchy and that land outside of settlement boundaries will be classed as 'countryside' where development will be permitted only in exceptional circumstances as set out in Policy CO.
20. Policy CO of the Local Plan states that in such countryside locations development will be permitted where it does not have a significant adverse impact either individually or cumulatively on the environment where, amongst other things, it is a rural exception site providing affordable housing in accordance with Policy RES. That policy sets out the circumstances under which affordable housing will be allowed in the open countryside in and around settlements where residential development is not normally permitted, including that ideally development would not be intrusive, and that there are secure arrangements to ensure that the benefits of affordable housing will be enjoyed by subsequent as well as initial occupiers. The principle of the provision of affordable housing on rural exception sites where appropriate is also set out in the Framework.
21. Policy LHH, following on from the requirements referred to under the previous main issue, states that the assessment of impacts on landscape and heritage assets relative to the significance of the asset affected will be balanced against other sustainable development objectives.
22. Policies LD and CO therefore only permit development outside of settlement boundaries in quite limited circumstances. In light of the adverse impact identified in respect of the character and appearance of the AONB, it is necessary to weigh this against the social and economic benefits of providing affordable housing on the site.
23. The proposed development would all be affordable housing. The Parish Council, along with a number of local residents, dispute that there is a need for such additional affordable housing in the village. The Parish Council has not adopted the 2011 Housing Needs Survey for Worth (the HNS) and it is claimed that the need identified has already been satisfied, at least in part, such that 9 further houses are not required.
24. The Council's submissions identify a need based both on the HNS, which generated a significant number of responses and I understand is still valid, and a report raised by the Housing Officer from the housing register on 28 November 2014 identifying households with a local connection not included in the HNS. The Council also points out that the need identified takes account of, and does not include, people housed in another fairly recent local affordable housing scheme built by Worth Community Property Trust (WCPT). I acknowledge that the lack of agreement is not ideal, and the claims that local knowledge suggests there not to be a need. However, I find the Council's submissions, based on appropriate documentary evidence, to be sufficiently compelling to enable me to find that there remains a local need in the village and Parish for the number and mix of units proposed.
25. The Parish Council also refers to an affordable housing unit becoming available at Begbie Cottages, subsequent to the opening of the WCPT development in 2012, and a further unit in the area allocated as a tied house, together with



- four affordable units provided in Harmans Cross. However, I do not have sufficient substantive information relating to those units and their occupancy to enable their proper consideration, and it remains the case that the Council's assessment of need is based on appropriate documentary evidence.
26. It is also claimed that the definition in the HNS relating to people having an ongoing local connection in terms of one or more family members having once lived or grown up in the parish or had family in the parish is vague and tenuous, creating no entitlement or necessity for a new house in an AONB. Nevertheless, need applies whether or not in an AONB. There should therefore be no reason why any definition has to be altered because of the site being in an AONB as need does not automatically override consideration of any environmental impacts.
27. Furthermore, I have received insufficient substantive evidence to demonstrate that such a need could be accommodated elsewhere without the need for this site.
28. I have also had regard to concerns about the additional housing being inappropriate in terms of the un-sustainability of the location. In this respect it is highlighted that the village does not have the facilities to serve the day to day needs of prospective residents such as shops, schools and health facilities and only a limited bus service, such that there would be much reliance on private cars. That may be the case but the village is nevertheless defined in Policy LD as one with a settlement boundary within which new development should be concentrated, as opposed to less sustainable locations in the countryside, and where the exceptional circumstances for development outside of the boundary, set out in Policy CO, could apply. That designation applies even though the pedestrian links are not ideal without footways and street lighting alongside the road into the village, although the proposal would at least provide a footway link to the edge of the existing settlement.
29. The provision of affordable housing on the site would therefore represent a significant social and economic benefit. On this basis, and given its location on the edge of the village, the principle of such a development would represent an exception to the otherwise general presumption against unsustainable new housing in the countryside provided that it would not have an over-riding significant adverse impact on the character and appearance of the AONB.
30. Due to the partially mitigating circumstances referred to above in terms of that character and appearance, I have found that although there would be an adverse impact in respect of the first main issue, it would not be a significant one. Therefore, I consider that were the dwellings to be secured as affordable, then this would be sufficient benefit to outweigh that adverse impact, having regard to policies LD and CO.
31. With reference to paragraph 204 of the Framework, a planning obligation to secure the dwellings as affordable housing would therefore be necessary to make the development acceptable in planning terms, and it would be directly related to the development, and fairly and reasonably related in scale and kind to the development.
32. Whilst the appellant has confirmed agreement to enter in to a Section 106 obligation with the Council to secure the affordable housing, no such completed and signed obligation has been submitted for my consideration. I have had

regard to the Government's Planning Practice Guidance (PPG) in respect of the use of conditions. A positively worded condition to require a planning obligation to be entered into would not be enforceable. Furthermore, a negatively worded condition to limit the development taking place until an obligation has been entered into would not provide sufficient certainty for all parties about what is being agreed. Notwithstanding the benefit of provision of needed affordable housing, the proposed development would not be sufficiently complex and strategically important to represent an exceptional circumstance for using such a condition.

33. Therefore, for the above reasons, in the absence of secure arrangements, in the form of a completed planning obligation, to ensure the provision of affordable housing in perpetuity, there would not be any exceptional circumstances to outweigh the adverse impact of the development on the character and appearance of the AONB. The proposed development would therefore not comply with national and local policies relating to development in the countryside. As such, it would be contrary to Policies LD, CO and LHH of the Local Plan.

*Other matters*

34. I have had regard to concerns raised about the amount of additional traffic and issues of highway safety. In terms of provision for on-site parking and safe egress onto the road, the proposals demonstrate 2 spaces per unit with adequate on-site turning space and visibility splays at the access. In terms of the increase in traffic generated, this would be likely to be relatively small compared with existing levels given the fairly small scale of the development. I am therefore satisfied that there would be unlikely to be a risk to highway safety resulting from the proposed development.
35. Concerns have been raised about the impact of the proposed development on protected species and other wildlife on the site. However, an ecological assessment has been carried out and various mitigation measures are set out in the submitted Biodiversity Mitigation Plan which could be secured by condition. In the absence of any other substantive evidence to the contrary, I am satisfied that the development would be acceptable in this respect.
36. Any concerns about flooding could be mitigated by adequate provision for surface water drainage.
37. With regard to the privacy of surrounding residents and protection of adequate daylight and sunlight to those properties, the proposed development would be positioned so as to avoid any unacceptable degree of harm in these respects, including an adequate degree of separation from No 2 Newfoundland Close diagonally opposite the site. In respect of concerns about impinging on the rights to peaceful enjoyment of that and other neighbouring properties, the residential nature of the development would be unlikely to generate noise not already expected within a residential area.
38. Despite the negative aspects of the visual impact of the development, its relatively small scale, together with the partially mitigating factors identified, would be unlikely to have the effect of causing any loss of tourism in the area.

**Conclusion**

39. Despite my findings in respect of the above other matters, for the reasons relating to the main issues, and taking account of all other matters raised, I conclude that the appeal should be dismissed.

*Andrew Dawe*

INSPECTOR

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## Appeal Decision

Site visit made on 16 February 2017

**by Andrew Dawe BSc(Hons) MSc MPhil MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 28 March 2017**

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**Appeal Ref: APP/B1225/W/16/3162354**

**Spyway Orchard, Durnford Drove, Langton Matravers, Dorset BH19 3HG**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Mr R Turner, Turner 2K (Swanage) Ltd, against the decision of Purbeck District Council.
  - The application Ref 6/2015/0687, dated 13 November 2015, was refused by notice dated 28 July 2016.
  - The development proposed is outline application (with all matters reserved) - rural exception site for a development of 28 dwellings (22 affordable and 6 open market).
- 

### Decision

1. The appeal is allowed and planning permission is granted for outline application (with all matters reserved) - rural exception site for a development of 28 dwellings (22 affordable and 6 open market) at Spyway Orchard, Durnford Drove, Langton Matravers, Dorset BH19 3HG in accordance with the terms of the application, Ref 6/2015/0687, dated 13 November 2015, subject to the conditions in the attached Annex.

### Procedural Matters

2. The application was submitted in outline, with all matters (access, layout, scale, appearance and landscaping) reserved for future consideration. Block and site plans have been submitted showing only an illustrative layout for the proposed development. I have determined the appeal on that basis.
  3. The Council in its decision notice, refers to the documents: 'Conserving Character' Landscape Character Assessment and Management Guidance for the Dorset Area of Outstanding Natural Beauty (AONB) (the LCAMG); and 'A Framework for the Future' Dorset AONB Management Plan (the AONB Management Plan). I have applied some weight to those documents due to their role in supporting the relevant development plan policies.
  4. There are differences between the original planning application form and appeal form in respect of land ownership. Clarification has been submitted in respect of this matter from both the Council and appellant, explaining why the appellant is recorded as the sole owner on the appeal form. Notwithstanding this, the appellant, during the appeal process, highlighted that a small area of the appeal site may be owned by the owners of Langton House and so issued them with the requisite notice of the appeal. I am therefore satisfied that the correct procedure in this regard has been followed and that those other
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possible owners have had the opportunity to make representations. They have therefore not been prejudiced in respect of this matter.

### **Main Issues**

5. The main issues are:

- i) whether or not the proposal can be considered as a rural exception site for residential development in the open countryside in respect of the provision for affordable housing;
- ii) the effect of the proposed development on the character and appearance of the AONB.

### **Reasons**

*Whether or not the site can be considered a rural exception site*

6. The site is located in the countryside, being outside of the village settlement boundary, where residential development is not normally permitted. However, policy RES of the Purbeck Local Plan Part 1 (the Local Plan) sets out that affordable housing will be allowed in the open countryside in and around settlements subject to various criteria.
7. Those criteria include a need to be satisfied that there is an identified need in the Parish or immediately adjoining Parishes which cannot otherwise be met; it would not comprise scattered, intrusive and isolated development and is close to sustainable transport modes; that the number of dwellings would be commensurate with the settlement hierarchy, of character appropriate to the location and of high quality design; and for secure arrangements to ensure the continued affordable housing benefits.
8. From the submissions, including the results of a Housing Needs Survey relating to Langton Matravers and reports generated from the housing register relating to this and adjacent Parishes, it is clear that there is a local need for affordable housing need. Furthermore, the degree of need would indicate that, in accordance with policy RES, it would be appropriate in principle to address some of that need from development outside of the settlement boundary. I have not received any substantive evidence to clearly demonstrate to the contrary, or in respect of the availability of other such sites.
9. The Council does not dispute that the proposed 6 market houses would be necessary in order to ensure the deliverability of the affordable housing as an exception site and I have no substantive basis to consider otherwise. Furthermore, in the context of the size of the settlement as a whole, and given that identified need for affordable housing, the number of proposed dwellings would not be disproportionate. Provision for rural exception sites is also consistent with the aims of the National Planning Policy Framework (the Framework) in terms of delivering local needs for affordable housing. The site is also in a fairly sustainable location on the edge of the village.
10. A planning obligation has been submitted to secure the proposed affordable housing, to meet the local need. For the above reasons I consider that this would be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale

and kind to the development. It would therefore meet the tests set out in paragraph 204 of the Framework.

11. For the above reasons, I conclude on this issue that the site would represent a rural exception site for the provision of affordable housing, in accordance with policy RES of the Local Plan, subject to further consideration below of the proposal's effects on the character and appearance of the AONB.

*Character and appearance of the AONB*

12. The site is within the AONB. Paragraph 115 of the Framework states that great weight should be given to conserving landscape and scenic beauty in AONBs. Policies D and LHH of the Local Plan together, in respect of this issue, require development proposals to positively integrate with their surroundings and to conserve the appearance, setting, character, interest, integrity, health and vitality of landscape assets. Policy CO specifically refers to exception sites being acceptable in the countryside subject to not having a significant adverse impact on the environment, visually, ecologically, or from traffic movements.
13. The proposed development would occupy an existing fairly large, gently sloping, field adjacent to the southern edge of Langton Matravers. The site currently contributes to the open and spacious setting of the village in this location, along with fields to the east and west of the site and the open grounds of Langton House to the south. However, unlike those surrounding areas, the site is relatively discrete due to the strong presence of mature trees around its perimeter and trees and vegetation on the western side of Durnford Drive, opposite the site. The removal of some of those trees on the site has been agreed with the Council, in relation to a new Tree Preservation Order and existing trees along the western side of the site would be removed. However, there would also be a scheme of new tree planting, such that the overall effect would be unlikely to be diminished to a material extent.
14. The proposed development would have a relatively high density compared generally to the nearby existing village properties, particularly those of Gypshayes backing onto the footpath running along the northern site boundary. Those properties have particularly long and mature rear gardens. However, from vantage points on footpaths to the east and south-east of the site, it would also be seen to some extent in the context of the much more clearly visible dwellings of The Hyde, to the north-east of the site. Those dwellings are generally located fairly close together, lining the road up to the edge of the open countryside. The illustrative site layout also shows how the proposed buildings would be set away from the eastern boundary. Together with the high degree of softening or screening from the trees surrounding the site, even in winter months with the leaves off, the proposal would be unlikely to have a dominating effect on that existing open setting south of the settlement when viewed from those vantage points.
15. From footpaths to the south of the site extending beyond the car park at the southern end of Durnford Drive, and those to the west of the site, the proposed development would be largely screened or significantly softened by a combination of intervening landform, trees, or the significant combined massing of buildings relating to Langton House. From those westerly footpaths, the closest part of the development comprising the nearest dwelling to Durnford Drive would also be seen to some extent in the context of those existing dwellings fronting that road immediately to the north. It would also

not appear as an alien built form within otherwise completely open countryside given the context of those buildings relating to Langton House which can be clearly seen from those vantage points.

16. From the closer vicinity on Durnford Drove, in front of the site, the transformation from the currently informal, open field to a formal housing scheme would be clearly evident. I have also had regard to the extent to which the proposal would be seen by visitors en route to the National Trust car park and the coast rock/cliff formation referred to by the Council as 'Dancing Ledge'. However, the nearest houses to the road, and those likely to be the most prominent, would be on the side of the site nearest to those existing houses fronting the road and so would be seen to an extent in that context. Those proposed on the southern side of the site would be set well back from the road and behind the existing barn and existing and proposed trees. They would therefore be less prominent.
17. The pleasant openness and tranquillity of the countryside to the south of the settlement is currently experienced when walking along the footpath to the north of the site, particularly as the dwellings to the north are significantly screened by the mature vegetation within the intervening rear gardens. The proposed scheme, particularly given its relatively high density, would in visual terms distract from that existing locally appreciated character, along that stretch of the path. However, in terms of noise generation, once completed, being a residential development where it is likely that there would be mainly rear gardens backing onto that path, it is unlikely that the levels generated would be to a harmful extent. Whilst construction activity would inevitably generate varying degrees of noise in that local context, that would be over a relatively limited period of time.
18. The nature of Durnford Drove clearly changes to the south of those existing dwellings, where it becomes narrower with trees or other vegetation either side. The proposed development would erode that to some extent, but only for a relatively short stretch immediately to the south of the nearest existing house. The southern part of the frontage would retain the existing barn and land around it including existing and new trees. From the point at which the road currently narrows, buildings associated with Langton House are also visible such that, along with the barn, that vista is not seen in the context of a lack of built presence. Those existing buildings of Langton House also already have a significant presence in relation to the approach to the car park and footpaths beyond.
19. Concerns have been raised about light pollution arising from the proposal. However, in respect of the wider landscape, and given the proximity to the existing village, there is no substantive basis for considering that this would be materially increased to an unacceptable level. Lighting details could also be considered at the reserved matters stage to ensure that any harmful pollution would be prevented.
20. Paragraph 116 of the Framework states that planning permission should be refused for major developments in AONBs except in exceptional circumstances and where it can be demonstrated they are in the public interest. There is no definition of 'major' in this context, in respect of numbers of dwellings, and I have found that the proposal would not be disproportionate to the size of the existing settlement. Furthermore, for the above reasons, the proposed

development would be unlikely to have a harmful impact on the wider AONB landscape, as opposed to more localised effects. For these reasons, the proposal does not warrant being considered a major development under paragraph 116 of the Framework.

21. For the above reasons, the proposal would not be seen as clearly impinging on the openness of the limestone plateau, in wider landscape terms. However, there would be some localised effects which would detract to some degree from the existing pleasant open rural nature of this part of the AONB. As such, I conclude on this issue that, in having regard to Policies D, LHH and CO of the Local Plan, supported by the LCAMG and AONB Management Plan, and to section 7 of the Framework requiring good design and paragraph 115, there would be some, albeit fairly limited, adverse impact on the character and appearance of the AONB.

*Other matters*

22. In respect of flooding I have had regard to the local concerns with existing drainage and about this being exacerbated by the proposal. However, based on the submitted evidence in respect of sewerage, drainage and flooding issues, I note that Wessex Water and the Local Lead Flood Authority have raised no objections subject to further mitigation details that can be secured by conditions. I have no substantive basis upon which to consider differently.
23. In respect of concerns about loss of privacy to neighbouring residents, this is a matter that would need to be considered in detail at the reserved matters stage, whereby the layout is not set at this outline stage. Nevertheless, based on the illustrative site layout drawing, I consider that a scheme could be designed to avoid an unacceptable level of overlooking of neighbouring properties and a harmful loss of privacy. The same would apply in respect of any concerns relating to loss of sunlight or daylight or any overbearing impact.
24. I have had regard to the additional vehicles that would be generated as a result of the proposal. The illustrative site layout shows that there would be adequate space for sufficient on and off-street parking within the site and for an access road of suitable width to allow two way traffic flow. Furthermore, it is unlikely that the additional number of vehicles would cause such an increase in traffic flows on the local network as to materially affect its capacity or increase the risk of collisions, including at existing road junctions with Durnford Drove. Despite concerns raised by local residents about the junction with the High Street, the Council also confirms that there were not any recorded accidents there within the five years prior to the Council's case officer report being written, and that it meets the minimum visibility standards. There would also be appropriate provision for pedestrian access to and from the site via footways.
25. I have also had regard to there being no objections from the highway authority with regard to highway safety and traffic flows and have no substantive basis to come to a different conclusion on this matter. The additional number of vehicles would also be unlikely to cause a harmful material increase in air pollution in the context of existing levels of vehicle movements in and around the village.
26. In respect of protected species on the site, I note that the proposal has taken account of the likely presence of Great Crested Newts and evidence of badger



activity. Mitigation measures are included within the submitted biodiversity mitigation plan, including enhanced habitat at the eastern end of the site, free from housing. Other measures to ensure the protection of nesting birds together with enhancement measures are also proposed. The implementation of the mitigation plan can be secured by condition. As such I am satisfied that the proposal would be likely to protect the biodiversity interests of the site. Local residents have also claimed there to be dormice present. However, I have received no substantive evidence, in the form of survey documentation, to support those claims.

27. Concern has been expressed as to the effect of the proposal on tourism in the locality, including in respect to holiday accommodation at Langton House. However, I have identified that there would only be some fairly limited adverse impact on the character and appearance of the AONB due to the nature and context of the proposal. Furthermore, in respect of its relationship to Langton House, it would be partially screened and softened by boundary trees and again, being a residential use, would be unlikely to be a significant noise generator. It would also be located on just one side of the large grounds of Langton House and with the proposed houses likely to be set away from the boundary. As such the existing sense of openness and spaciousness of those grounds would be likely to be retained. Together with its location immediately on the edge of the existing settlement, I have no substantive reason to consider that the proposal would deter people from visiting the area.

#### *Planning balance*

28. The Framework sets out that there should be a presumption in favour of sustainable development and indicates that to achieve that, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
29. I have had regard to the great weight that should be given to conserving the landscape and scenic beauty of the AONB. In this regard, I have found that there would be some, albeit fairly limited, adverse impact on the character and appearance of the AONB.
30. However, I have also found there to be some factors that would minimise the impact on the character and appearance of the wider AONB. I have also had regard to the reference in policy RES of the Local Plan to exception sites ideally not comprising intrusive development, and to policy CO where it refers to such sites being acceptable subject to not having a significant adverse impact on the environment, visually, ecologically, or from traffic movements. These policies do not therefore rule out development with some degree of environmental impact.
31. Furthermore, and importantly, the provision of 22 affordable dwellings would be a significant contribution towards addressing the local need in a fairly sustainable location on the edge of the village. I have also had regard to the Framework's aim to boost significantly the supply of housing, including affordable housing. I have therefore applied substantial weight to the proposed affordable housing provision. This factor, together with the lesser impact on the wider AONB and my finding that there would not be any other matters that would represent unacceptable harm, would therefore outweigh that more localised degree of harm that I have found would be caused to the AONB. Taking account of the development plan as a whole, it would therefore

be a sustainable form of development for which there is a presumption in favour.

32. It is disputed by the parties as to whether the Council can demonstrate a five year supply of deliverable housing sites (5 year HLS). Under paragraph 49 of the Framework, housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5 year HLS. However, in this case I have found that the proposal would comply with the development plan, taken as a whole. As such, with or without a 5 year HLS, my decision would not be altered.

#### *Conditions*

33. The Council has suggested nine conditions that it considers would be appropriate were I minded to allow the appeal. I have considered these in the light of advice in the Government's Planning Practice Guidance and amended some of the wording and omitted one. The standard conditions to ensure the development is implemented in accordance with the reserved matters, required to be first submitted and approved, and within the standard time period, would be necessary.
34. In the interests of preventing the risk of flooding of the site and surrounding area, conditions to secure the submission and implementation of a detailed and finalised surface water management scheme and details of foul water drainage disposal would be necessary.
35. In the interests of the character and appearance of the site and surrounding area, conditions to ensure the protection of trees to be retained, and that the reserved matters landscaping scheme takes account of those proposals for planting set out in the submissions would be necessary. To protect the biodiversity interests of the site, a condition to ensure that the development would be carried out in accordance with approved mitigation details would also be necessary.
36. The Council has also suggested a condition to secure details of all external facing and roofing materials. However, as this is an outline application with all matters, including appearance, reserved, it would be inappropriate and unnecessary to include such a condition at this stage.

#### **Conclusion**

37. For the reasons given above, and taking all other matters raised into consideration, I conclude that the appeal should be allowed.

*Andrew Dawe*

INSPECTOR

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## **ANNEX – Conditions**

- 1) Details of the access, appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) Before any groundworks start, a detailed and finalised surface water management scheme for the development site, based upon the hydrological and hydrogeological context of the development, together with details of responsibility, maintenance and management of that scheme and associated infrastructure, shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall be substantiated by adequate ground investigation. The approved scheme shall be fully implemented before the first occupation of any of the dwellings and thereafter managed and maintained in accordance with the approved details. These details shall include a plan for the lifetime of the development, the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime.
- 5) Before any groundworks start, a scheme of foul water drainage disposal from the development shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of the on-going management and maintenance of the scheme. The approved scheme shall be fully implemented before the first occupation of any of the dwellings. It shall be maintained and managed in accordance with the approved details.
- 6) All works impacting on retained trees during the construction of the development shall be carried out as specified in the SoundWood Tree Consultancy Arboricultural Method Statement Reference SW/AMS/266b/15, dated 24 September 2015.
- 7) The reserved matter landscaping scheme required to be submitted under the terms of condition 1 shall take account of the landscape proposals shown on the SoundWood Tree Consultancy Development Site Planting Specification Reference SW/AMS/266c/15 dated: 25 September 2015 and accompanying plan – Replacement Planting Layout SW5 dated: 25 September 2015.
- 8) The development hereby permitted shall be carried out and maintained in accordance with the approved biodiversity mitigation plan dated 24 February 2015 agreed by Dorset County Council on 25 February 2015 unless a subsequent variation is agreed in writing with the Local Planning Authority.

## **Appendix 4 – Guidance in respect to local housing need for travellers who do not meet the planning definition**

**Steve Boyt**

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**From:** Pop Info <pop.info@ons.gov.uk>  
**Sent:** 06 July 2018 16:43  
**To:** Steve Boyt  
**Subject:** RE: 2016-subnational population projections

Dear Steve

Thank you for your email.

Gypsies and Travellers were counted in the 2011 Census and therefore if they met the conditions to be a usual resident of England and Wales they were included in the count of the usually resident population of E&W on Census day. Population estimates from a census are updated every year until the next census to produce mid-year population estimates (MYEs) (see box below).



We do not make any special adjustments for gypsies and travellers in the yearly calculating of the population estimate, as it is assumed that any births, deaths and international migrations of this section of the population would be included in the estimates that we calculate for each of these components.

As a result we do not project this flow as a separate component in the population projections. We assume that this group appears in the mid-year population estimates and we project this group as part of the civilian population, i.e. apply same migration, fertility and mortality assumptions in the projected figures.

I hope this answers your question.

We would really appreciate it if you could [give us some feedback](#) on the service you received today - it takes less than a minute and your comments will help us to improve our services.

If you need anything further please do not hesitate to contact us.

With kind regards

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**From:** Steve Boyt [mailto:SteveBoyt@purbeck-dc.gov.uk]  
**Sent:** 05 July 2018 13:47  
**To:** Pop Info  
**Cc:** Ken Bean  
**Subject:** 2016-subnational population projections

For the attention of Andrew Nash

Dear Andrew

I am a planning policy officer at Purbeck District Council. The Council is working on reviewing its local plan – it hopes to prepare a plan for pre-submission publication in October this year. There is some continuing uncertainty at present over of the housing need that will need to be planned for in the Council's new local plan. The Council has taken account of the new method for calculating local housing need (LHN) published by Government last year as well as an objectively assessment need based on the guidance in current planning policy. As part of the process of getting as much clarification as possible I am attempting to ascertain whether the latest sub-national population projections (which I assume will be used to information LHN) take account of the gypsies, travellers and travelling show people who no longer meet the planning definition for travellers? My interest specifically relates to base line population in Purbeck.

I have started to review the FAQs and other supporting material around the population projections but I haven't managed to find the answer to my query.

Yours sincerely

Steve Boyt  
Senior Planning Policy Officer

Planning and Community Services  
Purbeck District Council  
Westport House  
Worgret Road  
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