



Purbeck Core Strategy Development Plan Document

Examination into the soundness of the plan

Statement on behalf of Purbeck District Council

Hearing date: Thursday 18 May 2012 – 10am

Matter 18: Design, Sustainable Design and Renewable Energy (Policies D, SD and REN)

Issues

- 18.1 Is the overall approach to design appropriate and will it result in distinctive development that will add to the character of the District?**
- 18.2 Is policy D consistent with the relevant national guidance, including in relation to climate change? Is the policy overly prescriptive?**

Introduction

1. This statement considers all the issues within Matter 18: Design, Sustainable Design and Renewable Energy (Policies D, SD and REN).

Statements of common ground

2. A statement of common ground (SCG) has been agreed between Purbeck District Council and English Heritage regarding Policy REN.

Why the Council considers the Core Strategy sound

3. Each issue raised by the Inspector is considered in turn below:

18.1 Is the overall approach to design appropriate and will it result in distinctive development that will add to the character of the District?

4. The built environment of Purbeck is one of its key qualities, and crucial in forming the identity of the District. The approach taken within the Core Strategy was to focus in particular upon those aspects of design, which could contribute, to encouraging locally distinctive design and to ensure that opportunities are taken where possible to reduce the environmental impact of development. The policy defers much of the general and specific detail to design guidance and character appraisals.
5. A key objective of the emerging District design guidance is to examine the nature of local distinctiveness as expressed in the character of the built environment, and thus ways in which this might be reflected in new development. Development proposals will be able to draw from up to date conservation area appraisals and new townscape character appraisals for the towns and key service villages. This should help to inform development proposals on how to reflect local character. The townscape character appraisals will also provide a guide to the appropriate density of development, as required by the NPPF (Para 47). This approach will replace the former local plan 'QL30: Houses in large gardens' policy.

18.2 Is policy D consistent with the relevant national guidance, including in relation to climate change? Is the policy overly prescriptive?

6. The criteria set out in para 58 of the NPPF relate to policy making for design, and can be used in decision-making. This does not imply that it is necessary to repeat its contents within local policy. The Council has addressed these criteria in para 8.15.2 and the first bullet of Policy SD.
7. The rationale behind Policy D was to focus more specifically upon aspects of design which will respond most positively to the distinctive character and qualities of the District. The importance of 'distinctiveness' in policy making is stressed throughout NPPF (paras 60, 126 and 131). The built environment and landscape within Purbeck are important in providing character and identity to the District, hence building in 'context' may be more important here than elsewhere.
8. The NPPF (para 10) stresses the importance of responding to local circumstances in plan making. Policy D focusses upon aspects of design that will respond most positively to the distinctive character and qualities of the District. Taking account of the character of different areas is a core planning principle within NPPF (para 17),

and therefore the Council's approach of using townscape character appraisals provides a key means of doing this. The fourth bullet of paragraph 58 of the NPPF stresses the importance of design responding to local character (mentioning the importance of materials – a crucial component of local identity in Purbeck), and this is further emphasised in the third bullet of paragraph 126 in relation to the historic environment (a key contributor to local distinctiveness in Purbeck). Mention within Policy D is entirely consistent with this. Safeguarding amenity through design is a second core planning principle in NPPF (para 17). Policy D states how this can be achieved. The importance of delivering gains for biodiversity is expressed within the third bullet of paragraph 109, and achievement of this through incorporation within development in the fourth bullet of para 118 within the NPPF. Again Policy D is consistent with the approach, stating key areas in which these objectives may be delivered. Building for Life represents a simple assessment tool which, whilst no longer referenced by national policy, is widely recognised and will help to deliver the aspirations of paragraphs 56 and 58 of the NPPF

9. Design in relation to climate change is the primary subject of Policy SD. The thresholds of 10% renewable energy on development of 10 or more dwellings and the requirement to at least match building regulations targets on achieving zero carbon homes is consistent with para 95 of the NPPF. A requirement for developers to demonstrate a positive approach to sustainable development through site layout and building design is consistent with para 96 of the NPPF.

Suggested changes for the Inspector to consider

10. Merge Policies D and SD as per change 93 of the Minor Changes Schedule¹. This is owing to the substantial overlap of their contents; the otherwise confusing and superficial distinction made between 'design' and 'sustainable design' (i.e. achievement of sustainable development generally requires designing in a sustainable way); and because such merger will allow the more effective application of policy contents and achievement of their objectives. Merging the policies will effectively reverse a change made to the Pre-submission Core Strategy, which delivers no apparent benefit.
11. In addition, amend Policy D as set out in change no 93 of the Minor Changes Schedule to replace the incorrect reference to 'Sandford' with 'North Wareham' regarding townscape character assessments. Add a bullet to Policy REN: 'It avoids causing harm to the significance and setting of heritage assets' as agreed with English Heritage in the SCG.

¹ SD26: Minor Changes Schedule