

# Purbeck Local Plan Review 2019

## Matter C: Green Belt Further Representations Thursday 4 July 9.30am

	<b>Consultee ID</b>	<b>Name/Organisation</b>
1	1188067	Welbeck Land
2	1189740	Mr Rob Holden
3	1191908	Dr Andrew Langley
4	1190247	Bloor Homes Southern
5	1190180	The Charborough Estate
6	1191015	Mrs Mandy Backhouse
7	1191476	Residents of Glebe Road
8	1190535	Ms Naomi Pickard
9	1188470	Moreton Parish Council

**PURBECK LOCAL PLAN 2018 - 2034**

**EXAMINATION IN PUBLIC**

**RESPONSE TO MATTER C: GREEN BELT**

**ON BEHALF OF WELBECK LAND**

**JUNE 2019**



**WELBECK LAND**

**Carter Jonas**



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## 1.0 INTRODUCTION

- 1.1 This statement is submitted by Welbeck Land (“Welbeck”) in relation to the Examination in Public of the Purbeck Local Plan 2018 - 2034 (“the plan”). Carter Jonas LLP is instructed by Welbeck.
- 1.2 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate.
- 1.3 Welbeck has been supportive of the preparation of the plan and the overall principle direction of key elements of the plan. Welbeck supports the overall strategy and the intention of providing a stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 1.4 Welbeck has specific and important concerns that the plan and its reliance on the Wareham Neighbourhood Plan will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham’s size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 1.5 Representations were made detailing the views of Welbeck through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 1188067).
- 1.6 In this submission, Welbeck sets out its responses to Matter C: Green Belt.
  - Issue 1: Green Belt
  - Questions 1 to 4.

This statement should be read in combination with the Welbeck responses to the inspector’s other Matters.

## 2.0 INSPECTOR'S MATTER C: GREEN BELT

### Issue 1: Green Belt

**Q1. Is the in-principle need to review the Green Belt fully evidenced and justified, effective and consistent with national policy including paragraphs 136 and 137 of the Framework?**

2.1 The NPPF states at Paragraph 136 that:

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”*

2.2 The Plan acknowledges the need to satisfy the test of ‘exceptional circumstances’ in altering the designated Green Belt. Paragraph 47 of the plan sets out a list of 8 exceptional circumstances justifying the removal of land from the Green Belt through the Plan.

2.3 LJ Jay in the *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078 (Admin) 99 case noted that (albeit referring to the 2012 iteration of the NPPF):

*““Exceptional circumstances” remains undefined. The Department has made a deliberate policy decision to do this, entrusting decision-makers with the obligation of reaching sound planning judgements on whether exceptionality exists in the circumstances of the individual case.”*

2.4 The *Calverton* case is helpful at Paragraph 51 in stating:

*“In a case such as the present, it seems to me that, having undertaken the first-stage of the Hunston approach (assessing objectively assessed need), the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:*

- (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);*
- (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
- (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
- (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”*

2.5 Furthermore, in *R. (Luton BC) v Central Bedfordshire Council* [2015] 2 P.& C. R. 19, the Court of Appeal held (at Para.54) that the “very special circumstances” test in NPPF (2012) – in respect of assessment of planning applications for inappropriate development in the Green Belt - is a:

*“stricter test than that in paragraph 83 in respect of changing the boundaries of the Green Belt in the local plan.”*

2.6 The Court of Appeal went on to state that:

*“it may be easier to proceed in stages, by changing the local plan to take a site out of the Green Belt (according to the less demanding “exceptional circumstances” test) and then granting permission for development without having to satisfy the more demanding “very special circumstances” test.”*

2.7 Accordingly, the plan – read as a whole – and specifically the exceptional circumstances set out in the plan demonstrate that there is an acute housing need in the area, and that neighbouring authorities are unlikely to be able to help meet those needs. Indeed the reverse is true, it is Purbeck that is likely to need to help meet the needs of others, in time. There is opportunity for sustainable growth in sustainable locations provided limited Green Belt release can be achieved. The area is otherwise constrained by either Green Belt, or AONB or other sensitive designations. A reasonable balance can be struck and Green Belt release provides for sustainable development with lesser impact than increased pressure on other ‘non-political’ designations. The council has undertaken Green Belt studies and reviews in 2018 and 2019 to understand the performance and function of the Green Belt and identified the potential nature and extent of any harm, and finally, consequential impacts have sought to be ameliorated through the provision of SANG.

2.8 Welbeck does have some concerns about some of the detailed releases, and the overall consistency of new boundary choices, but the ‘in principle’ argument is sound to review the Green Belt boundaries.

2.9 Welbeck notes that the final provision of NPPF paragraph 136 is as follows:

*“Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”*

2.10 This final provision gives clear guidance that neighbourhood plans (NP) like that a Wareham have the ability to deliver detailed Green Belt boundary changes. It is suggested that this is the most appropriate approach and the Wareham NP should be required – through strategic policy – to review its position in this regard upon the adoption of the Purbeck Local Plan. This would allow for a more positive and effect way of Wareham meeting its housing target than including the undeliverable development of active employment sites and an over reliance on windfall.

2.11 NPPF paragraph 137 has introduced a ‘sequential’ approach to considering the need for Green Belt boundary amendments. This includes requirements on a planning authority to ensure their strategy:

*“a) makes as much use as possible of suitable brownfield sites...  
b) optimises the density of development ...; and  
c) has been informed by discussions with neighbouring authorities...”*

2.12 The plan identifies the lack of brownfield opportunities in the area. Welbeck contend that in Wareham in particular there is an attempt to allocate land that is suggested as brownfield (Westminster Road employment site) but it is in fact in active use, so the availability of such is even less than assumed.

2.13 The plan attempts to seek appropriate densities but this must be balanced with the need to conserve and enhance the local landscape and heritage character, and finally

discussions appear to have been conducted with neighbouring authorities and it seems inevitable that the needs of those neighbours will in fact be greater than Purbeck, so the pressure is incoming rather than outgoing in terms of housing need.

**Q2. Have exceptional circumstances 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, Upton and Wareham and the Morden Park strategic alternative natural green space (SANG) and holiday park (Policy I5)?**

2.14 The NPPF at paragraph 138 identifies that:

*“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt...”*

2.15 Purbeck District Council considered parcels of land across the Green Belt in its area, especially that at the edge of the built areas, in otherwise sustainable locations for development – in particular at Lytchett Matravers, Upton and Wareham. The Green Belt of North Wareham in their *Strategic Green Belt Review, January 2018*, and in their *Green Belt Background Paper, February 2018*. These reviews concluded that the strongest performing Green Belt land parcels were located to the south east of the Lytchett Minster; west of Upton; and along the eastern edges of the District. The land parcels in these areas were seen to perform well against the Green Belt criteria. As a result it was concluded that these areas should be avoided when considering any development in the area.

2.16 In considering the North Wareham and Sandford areas of particular interest to Welbeck Land, the Review showed (map 41, page 110) that land to the north west of North Wareham and to the south of the River Piddle flood plain were ranked the lowest in terms of Green Belt function and accordingly (map 42, page 115) serve the least purpose.

2.17 The land providing the least contribution to the Green Belt included the site at Bere Road (reference SHLAA/ 0058) and Carey Road (referenced SHLAA/ 0059) sites at North Wareham. The sites are in close proximity, both sites are largely similar in character, both perform similarly in terms of the effect on Green Belt purposes. Both sites have been assessed as meeting the exceptional circumstances necessary for Green Belt release for housing. However despite the reasoned investigation and the recognised significant housing need in Wareham, SHLAA/0058 has not been proposed for release in the Local Plan.

2.18 Exceptional circumstances have been demonstrated for the suggested releases, but they have also been identified for further release at Bere road. This area too, should be released from the Green Belt, or the Wareham NP should be directed to consider it afresh with its conferred ability under the revised NPPF to redraw boundaries in a non-strategic capacity as explained in response to question 1 above.

2.19 NPPF paragraph 138 also includes instruction for how planning authorities should consider:



*“They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*

2.20 This, in short, the council has achieved through the identification of SANG.

**Q3. Is policy V2 (Green Belt) consistent with national policy in so far as it relates to the purposes of the Green Belt? If not, would the change to the policy (MM2) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?**

2.21 Welbeck considers that policy V2 is sound insofar as it relates to national policy. The suggested modification proposes language that is more closely related to that in the NPPF and this should be included in the final plan.

2.22 However, policy V2 should be modified to ensure its effectiveness. Welbeck considers that in order to protect and utilise the strategic value of Wareham as a location for housing growth, and to ensure that an appropriate range of sites are available for strategic allocations by the Local Plan for use during the plan period and beyond, the Bere Road site should also be removed from the Green Belt.

**Q4. Is the creation of suitable alternative natural greenspace (SANG) to offset the impact of removing land from the Green Belt at Lytchett Matravers and Wareham justified? If so, is the wording of policy V2 in relation to this matter sufficiently clear and robust as to be effective?**

2.23 Welbeck considers that the creation of SANG to offset the impact of removing land from the Green Belt at Lytchett Matravers and Wareham is justified. Welbeck considers that the need for a SANG and its delivery is a strategic matter, as it is necessary strategic mitigation for growth identified in the Local Plan.

2.24 Furthermore, given that Green Belt release is fundamental to the housing and SANG strategies of the Wareham Neighbourhood Plan, and that the submitted Neighbourhood Plan is unable to release such sites or provide assurances over their delivery, the Neighbourhood Plan should be paused. This pause should be until such time as the Purbeck Local Plan has been adopted and which will provide the strategic direction required for an informed Neighbourhood Plan.

2.25 Welbeck is concerned however that the wording of policy V2 is not sufficiently clear to be effective and ensure the delivery of the SANG.

2.26 The provision of a SANG is a complex and expensive matter and insufficient evidence is currently available as to the ability of proposed NP allocations (H5 and H6) to make significant financial contributions towards its delivery. The entirety of the Wareham Neighbourhood Plan area is located within the 5km core recreational catchment for the Dorset Heaths European sites. As such all residential development required by the Local Plan and provided by the Neighbourhood Plan has the potential to result in an adverse effect on its integrity in combination.

2.27 The SANG proposed within the Local Plan at Morden Park Corner – by comparison to that in Wareham – is a simpler delivery task. The beneficiary of the holiday park is also the provider of the SANG, therefore the provision of the SANG is directly linked and viable. Whilst all parties are agreed that all sites that rely on a SANG would need to make a payment towards the SANG there is no further information provided within the Wareham Neighbourhood Plan. Welbeck has concerns that other brownfield sites

proposed to be allocated in the Neighbourhood Plan are not viable (or necessarily available) as matters stand and will not be able to make SANG contributions which demonstrably threatens the delivery of both housing and SANG.

- 2.28 For its part, regarding the SANG at Wareham, Welbeck has entered into a Statement of Common Ground with the Wareham Town Council, to demonstrate that it can be delivered.
- 2.29 Both the Local and Neighbourhood Plans are supported by Habitats Regulations Assessments (HRA). The Local Plan strategic identification for around 300 new dwellings in Wareham (200 considered in the HRA) and the Neighbourhood Plan site allocations both produce the conclusion that a SANG is required. The SANG is necessary to protect the nearby European and International Nature Conservation Sites from the impact of increased recreational and urban pressures likely to result from development of sites in the NP potentially 180 dwellings in total. The Dorset Heathlands Planning Framework 2015-2020 SPD sets out policy and quality standard guidelines for the provision of SANG.
- 2.30 Welbeck has worked closely with Natural England to consider potential options as to what land within Welbeck's control or that of the wider Estate may be suitable as a Habitat Improvement Plan area (HIP) or SANG. This has included considering the different potential capacities of the various options.
- 2.31 The output of the exercise has been to identify several potential mitigation strategies. The smallest being a HIP suitable for c40 dwellings and the largest being an enlarged SANG suitable for c180 dwellings. At this stage the delivery of any option has not been proven in terms of land assembly, appropriate land value, construction, and ongoing management.
- 2.32 Works to demonstrate the delivery of suitable mitigation are ongoing. At present Welbeck can only offer moderate to reasonable confidence in the ability to deliver a HIP suitable for c40 dwellings specifically to serve the 'Carey Road' (H4) allocation. It is recognised that the full delivery of 60 dwellings at H4 triggers the need for a SANG as will the proposed development of the other allocated sites at NP policies H5 and H6. The initial delivery of 40 dwellings at H4 can be achieved as to not compromise the eventual total delivery of 60 dwellings.

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Ms Beverley Doward BSc, BTP, MRTPI  
c/o Miss Helen Nolan, Programme Officer Examination of the Purbeck Local Plan  
Dorset Council  
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7 June 2019

Dear Ms Doward

**POLICIES MAP supplementary representation to Comment ID PLPP308**

I request your permission to allow a supplementary submission for your examination of the Purbeck Local Plan.

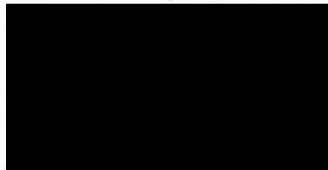
I previously submitted that the Lytchett Matravers Townscape Character Appraisal Supplementary Planning Document was relevant to the anomalous Green Belt designation. This supplement provides relevant extracts of that SPD, with a small number of relevant accompanying documents and submissions.

The following page plus appendices is supplementary to my existing answer to the question:  
**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate.**

My answers to all the other questions are unchanged.

Thank you for your assistance.

Yours faithfully

A solid black rectangular box redacting the signature of Robert Holden.

Robert Holden  
Representor ID 1189740

## POLICIES MAP

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

The supplementary text below plus attachments should be read in conjunction with the existing answer provided 03 December 2018.

Townscape Character Appraisal Supplementary Planning Documents for the Towns and Larger villages in Purbeck were produced in 2010 by external experts with specific expertise in urban planning. The Townscape Character Appraisal SPDs provide a finer level of granularity and accuracy, street by street, to support the umbrella policies in the Local Plan relating to urban design. The Introduction<sup>Appendix 2</sup> states *Part 03 Town Analysis. This part analyses the urban form...* The SPD's were formally adopted 11 September 2012. The Adoption Statement<sup>Appendix 1</sup> includes *The SPDs will help to facilitate sensitive development and suitable design within the settlements they cover.* The corollary is that any area included in a Townscape Character Appraisal is urban settlement and has been accepted as such since 2012.

Paragraph 104 of the submission version of the draft Purbeck Local Plan reaffirms these SPD's as intrinsic parts of the Plan.

The Introduction<sup>Appendix 2</sup> describes the thorough methodology that was followed including use of desktop data sources, fieldwork and local review groups. The Introduction<sup>Appendix 2</sup> states *...care was taken to ensure the proper consideration was given to all parts of each town or village....* After the draft SPDs were published, amendments were made by PDC and further amendments after public consultation. The final adopted reports were the product of a comprehensive methodical analysis process with extensive checks and reviews, therefore confidence can be placed in the statements contained therein.

On the Townscape Character Types Map<sup>Appendix 3</sup> the whole of the Revision A area is within the *Low Density Residential* character type area, shaded blue, which is an anomaly with the designation as Green Belt. This anomaly is emphasised by the treatment of two other residential clusters of dwellings. The Glebe Road cluster of houses at the southern end of Wareham Road is assessed as urban townscape in the SPD and this cluster is not designated as Green Belt which is a consistent treatment. The cluster of approximately 13 dwellings along Middle Road (orange highlight added) is not classified as urban townscape and is designated as Green Belt which is a consistent treatment.

Section 04.7 of the SPD<sup>Appendix 5</sup> provides a detailed description of the *urban structure and urban grain* of the *Low Density Residential* Townscape area, including the Revision A area. These urban descriptions contradict the NPPF fundamental Green Belt characteristic of openness. The urban attributes described for the Revision A area indicate that the Revision A cannot at the same time fulfil the NPPF Green Belt purpose of safeguarding the countryside from urban encroachment.

Appendices:

Appendix 1 Adoption Statement

Appendix 2 Introduction

Appendix 3 Townscape Character Types Map

Appendix 4 Townscape Character Development Forms

Appendix 5 Low Density Residential Townscape Character Area Description



**ADOPTION STATEMENT  
WAREHAM, NORTH WAREHAM, SWANAGE, UPTON, BERE REGIS, WOOL,  
LYTCHETT MATRAVERS, CORFE CASTLE AND BOVINGTON TOWNSCAPE  
CHARACTER APPRAISAL  
SUPPLEMENTARY PLANNING DOCUMENTS**

In accordance with Regulations 12(a), 14(a) (ii) and 35 of the Town & Country Planning (Local Development) (England) Regulations 2012 (No. 767), that the Wareham, North Wareham, Swanage, Upton, Bere Regis, Wool, Lytchett Matravers, Corfe Castle and Bovington Townscape Character Appraisals were formally approved for adoption as Supplementary Planning Documents (SPDs) by Purbeck District Council on 11<sup>th</sup> September 2012, with the SPDs coming into full effect from that date

The SPDs provide further detail to policies within the Purbeck Local Plan Part 1 (PLP1). The SPDs will help to facilitate sensitive development and suitable design within the settlements they cover.

Public consultation was carried out on the contents of the SPDs between 1st June and 30th July 2010. As a consequence of representations received, and changes in national planning policy and local designations between consultation and adoption, a number of amendments were made to the documents as follows:

- Planning policy references updated to reflect adoption of the National Planning Policy Framework and PLP1.
- Current boundaries for Langton Matravers, Herston, Wareham, Wool and Stoborough conservation areas shown.
- Correction of errors shown in references to and labelling of streets, routes and development in and around Wareham, North Wareham and Corfe Castle.
- The importance of green space along Swanage seafront highlighted.
- Clarification of points within the appraisal of development on Ballard Estate.
- Correction of erroneous identification of private garden as public open space in Bere Regis.
- Clarification of the role of Bere Regis as a place to work.
- Correction of errors and omissions in land use maps for Bovington and Bere Regis.

The adopted SPDs and this Adoption Statement are available as follows:

**Purbeck District Council, Westport House, Wareham**  
Monday – Thursday 8.30am – 5.00pm. Friday 8.30am – 4.30pm

**APPENDIX 1**



## Lytchett Matravers

### Introduction

#### 01.2

### Purpose: What is a Townscape Character Appraisal?

1.2.1 A Townscape Character Appraisal is a document that identifies the different qualities that make up the character of a town or village and what makes it special or distinctive from somewhere else. There are also significant variations in character within the settlements themselves.

1.2.2 Its purpose is to identify the factors that influence how a place looks and feels and to consider how these contribute to the character of the settlement.

1.2.3 Some areas within a town or village may be of special historic or architectural interest the character or appearance of which it is desirable to preserve or enhance – these will be designated Conservation Areas and subject to a separate process of Conservation Area Character Appraisal.

1.2.4 Developing a better understanding of the character of a place is essential in the preparation of planning policies and in the sensitive management of change and development within Purbeck's towns and villages. Without a clear appreciation of what makes a place special it can be difficult to ensure that proposals for any new development respect their context and can be accommodated in a satisfactory way.

1.2.5 A Townscape Character Appraisal will therefore assist in safeguarding local character and can be used to ensure sensitive, high quality new design where development does occur.

1.2.6 Consideration of character can also be used to identify the potential of different areas to accommodate new development, as well as influencing specific design policies.

### Report Structure

1.2.7 The report is structured into 5 parts as follows:

#### Part 01. Introduction

This explains the background and context to the study and the methodology and report structure.

#### Part 02. Town Context

This examines the geographical context, landscape setting and historic background of the settlement.

#### Part 03. Town Analysis

This part analyses the urban form and organisation of the settlement, and it examines the different aspects of the town or village itself through a range of different topics, such as building height, landscape and open spaces, street patterns etc.

#### Part 04. Character Types

This part of the report draws on the findings of Parts 02 and 03 and identifies different character types which together make up the different places of the settlement.

#### Part 05. Townscape Analysis

This provides an overview of the key townscape characteristics for each settlement.

### Methodology

1.2.8 The methodology used for the Townscape Character Appraisal for each settlement involved the following stages:

- Desk Study;
- On-site survey;
- Stakeholder consultation;
- Final report.

#### 1.2.9 Desk Study

The desk study gathers together relevant information from previous recorded work. This includes:

- Purbeck District Council's digitised layered mapping (including items such as up-to-date mapping of the town, contours, conservation areas, landscape designations etc.).
- Background publications (such as conservation area appraisals, the Employment Land Review, Landscape Character Assessment, Parish/Community Plans, local history publications etc.).

#### 1.2.10 On-Site Survey

The on-site survey involved gathering fundamentally original information on those features not readily found in available sources, that contribute to the make up and character of each settlement.

1.2.11 A photographic record was taken of different areas within each town or village. Information was also gathered on topics such as building heights, land use, open spaces and landscape, areas of high and low activity etc. This information was subsequently digitally mapped for inclusion within these reports.

1.2.12 On-site survey work considered both the broader, more strategic aspects for each town or village, such as its setting within the wider landscape and its interface between town and country, as well as the identification of individual 'character types' within each settlement. This included some of the more detailed aspects, such as building form and architectural features.

1.2.13 During the survey work care was taken to ensure that proper consideration was given to all parts of each town or village, not just the older or more historic areas, which are often found within conservation areas. It is important that the whole of each town or village should be given due consideration.

#### 1.2.14 Stakeholder Consultation

Two public consultation events were held for key stakeholders associated with each settlement. These were important for gathering information on local views of the appraisal work. In particular, these events concentrated on the issue of potential change and opportunities for accommodation of new development within these settlements:

One event was held for the three towns:

- Wareham/ North Wareham;
- Swanage;
- Upton.

A second event was held for the villages:

- Bere Regis;
- Wool;
- Bovington;
- Corfe Castle;
- Lytchett Matravers.

1.2.15 The report for each settlement combines the findings of the desk study and on-site survey, through the use of maps, photographs, written descriptions and analysis.

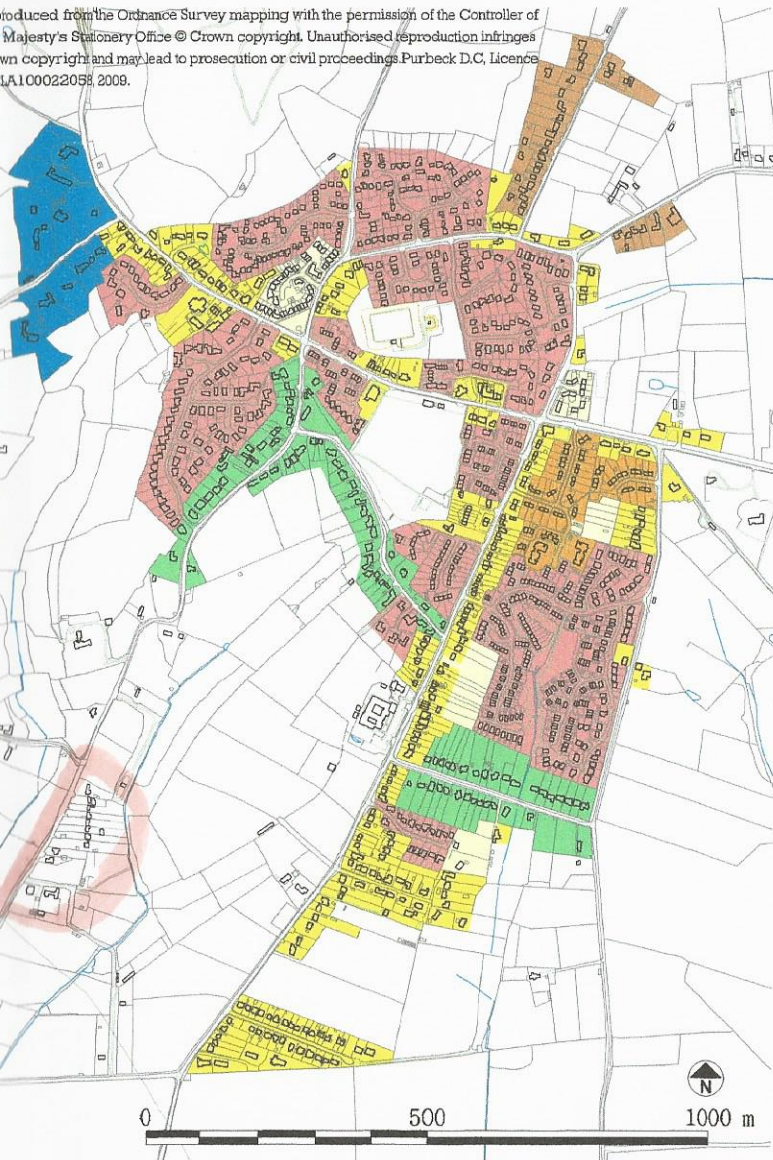
1.2.16 Following the stakeholder consultation events the feedback received was assessed and where appropriate, changes were incorporated into the final reports.





# Lytchett Matravers Character types

## 4.1 Character types

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-  Modern estate development
-  Council house development
-  Mixed residential
-  Neo-Vernacular style housing
-  Village lanes
-  Low density residential
-  Ribbon development

APPENDIX 3



4.1.1 This section of the report identifies the different 'types' of development that together combine to make up the settlement as a whole. These are described as 'character types' and have been identified as a result of the preceding town analysis. The map opposite indicates the locations of each character type within the settlement.

4.1.2 The Government's urban design guidance *By Design* (2000) identifies those aspects of our built environment, i.e. the buildings, structures and spaces, which are the physical expression of our townscape. These are what influence the pattern of uses, activity and movement in a place and the experiences of those who visit, live or work there.

4.1.3 The key 'aspects of development form' identified in *By Design* (set out in the boxes opposite) have been applied consistently to each character type to help identify the different characteristics and qualities of each distinct part of the town.

4.1.4 Each character type is accompanied by a series of photographs illustrating 'typical' scenes within those areas to provide a flavour of what each place is like.

4.1.5 Finally, a SWOT analysis identifying Strengths, Weaknesses, Opportunities and Threats, has been applied to each character type. This is to explore what potential may exist for future development opportunities and how the character of these areas could be threatened through inappropriate or insensitive changes.

#### Aspects of development form

Definition	Explanation
<p><b>Layout: urban structure</b> The framework of routes and spaces that connect locally and more widely, and the way developments, routes and open spaces relate to one another.</p>	<p>The layout provides the basic plan on which all other aspects of the form and uses of a development depend.</p>
<p><b>Layout: urban grain</b> The pattern of the arrangement of street blocks, plots and their buildings in a settlement.</p>	<p>The degree to which an area's pattern of blocks and plot subdivisions is respectively small and frequent (fine grain), or large and infrequent (coarse grain).</p>
<p><b>Landscape</b> The character and appearance of land, including its shape, form, ecology, natural features, colours and elements, and the way these components combine.</p>	<p>This includes all open space, including its planting, boundaries and treatment.</p>
<p><b>Density and mix</b> The amount of development on a given piece of land and the range of uses. Density influences the intensity of development, and in combination with the mix of uses can affect a place's vitality and viability.</p>	<p>The density of a development can be expressed in a number of ways. This could be in terms of plot ratio (particularly for commercial developments), or number of dwellings (for residential developments).</p>
<p><b>Scale: height</b> Scale is the size of a building in relation to its surroundings, or the size of parts of a building or its details, particularly in relation to the size of a person. Height determines the impact of development on views, vistas and skylines.</p>	<p>Height can be expressed in terms of the number of floors; height of parapet or ridge; overall height; any of these in combination; a ratio of building height to street or space width.</p>
<p><b>Scale: massing</b> The combined effect of the arrangement, volume and shape of a building or group of buildings in relation to other buildings and spaces.</p>	<p>Massing is the three-dimensional expression of the amount of development on a given piece of land.</p>
<p><b>Appearance: details</b> The craftsmanship, building techniques, decoration, styles and lighting of a building or structure.</p>	<p>This includes all building elements such as openings and bays; entrances and colonnades; balconies and roofscape; and the rhythm of the facade.</p>
<p><b>Appearance: materials</b> The richness of a building lies in its use of materials which contribute to the attractiveness of its appearance and the character of an area.</p>	<p>The texture, colour, pattern and durability of materials, and how they are used.</p>





## Lytchett Matravers Character types 04.7 Low Density Residential

### Low Density Residential

#### Urban Structure

- Dwellings loosely set out along High Street and Jennys Lane in an irregular arrangement;
- Narrow lanes enclosed by embankments with mature vegetation;
- Dwellings accessed by individual drives.
- Plots of irregular shape and size.

#### Urban Grain

- A scattering/loose urban grain with variable separation and siting of buildings relative to the lanes and each other;
- The lanes feel enclosed by embankments and vegetation, but not by buildings which are well set back within plots.

#### Landscape

- Grass verges and banks, open in places but predominantly backed by a mix of trees, shrubs and hedges that contribute to the rural character and appearance of the lane;
- Mature trees within and beyond plots create a soft green backdrop;
- Dense evergreen hedges often prevent views into properties.

#### Density and Mix

- Low density;
- Exclusively residential land use.

#### Height

- 2 storey houses.

#### Massing

- Domestic scale massing although some properties are large and extensive;
- Extensions and outbuildings are a feature of these properties. Large size and architectural manner as well as various extensions result in some elaborate roof forms.

#### Details

- Details vary and reflect the age and period of the development;
- Several historic and vernacular buildings orientated at angles to the roads;
- Some recent development of large neo-vernacular manner with associated details;
- Pitched roofs, chimneystacks and dormers define outline of buildings.

#### Materials

- The mixed and incremental nature of development has resulted in a range of architectural styles and materials which reflect the age and style of each development. However walls are mostly red brick, under red or red/brown plain tiles or slate.



#### Strengths

- Some buildings with strong traditional/vernacular character.
- Attractive informal lanes with hedges, banks and no pavements.
- Green low density appearance with trees and hedges.
- Distinctive informal character and appearance.

#### Weaknesses

- Interesting historic houses often hidden from view.

#### Opportunities

- Possibly some potential for very limited infilling with sensitive designs at low density.

#### Threats

- The introduction of 'highway improvements' such as pavements or road widening could detract from the informal character of the lanes.
- Inappropriate or excessive infill development could undermine the character and quality of this area.

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## **Part I Matter C. Green Belt**

### **1 Issue 1. Green Belt**

#### **1.1 Q. 2**

1.1.0.1 I do not believe exceptional circumstances to justify changing the green belt boundary at Morden (policy **I5**) have been established. Please refer to my comments under Matter H, Issue 3, Q.3. This site has been removed from SD24 - Green Belt Study after the pre-submission consultation.

## Examination of the Purbeck Local Plan Matter C: Green Belt



### Statement on behalf of Bloor Homes Southern

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#### **Q1. Is the in-principle need to review the Green Belt fully evidenced and justified, effective and consistent with national policy including paragraphs 136 and 137 of the Framework?**

1. No. There is a need to consider a wider, more strategic review of the green belt, as indicated in the (former) Dorset planning authorities SoCG [SD10a]. This should consider the long-term need for green belt boundary change, not a short term 'interim' approach which is implied by the current Purbeck strategy. Paragraph 136 of the NPPF states that the need for changes to green belt boundaries should have '*regard to their intended permanence in the long term*'.
2. Given the re-organisation of authorities in Dorset, it is more readily recognised that Purbeck does not exist in a vacuum. Notably, at paragraph 26 of the SoCG it is stated that:

*...Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, including making best use of brownfield sites, optimising the density of development, and discussing with neighbouring authorities whether they could accommodate some of the identified need, as demonstrated through the statement of common ground. **Before any amendment to Green Belt boundaries in South East Dorset, therefore, it will need to be demonstrated that this latter solution has been properly considered through joint working**' [our emphasis].*
3. Dorset Council and BCP Council are new authorities, and at the current time there is not evidence that joint working has been undertaken to consider whether they should accommodate some of the identified need for development for Purbeck, nor indeed whether the Purbeck area is best placed to accommodate needs that cannot be met, for example, in the BCP Council area. Accordingly, it is not considered that Purbeck's review of the green belt is fully consistent with the NPPF.
4. A comprehensive strategic green belt review can only be undertaken as part of the preparation of the new Dorset Council Local Plan and new BCP Council area Local Plan.



**Q2. Have exceptional circumstances 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, Upton and Wareham and the Morden Park strategic alternative natural green space (SANG) and holiday park (Policy I5)?**

5. See Q1 response above.

**Q3. Is policy V2 (Green Belt) consistent with national policy in so far as it relates to the purposes of the Green Belt? If not, would the change to the policy (MM2) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?**

6. No, policy V2 (Green Belt) is not consistent with national policy in so far as it relates to the purposes of the green belt.
7. MM2 is an improvement to the wording of Policy V2a. However, Bloor Homes remains concerned with V2d. which is not consistent with the purposes of green belt to prevent neighbouring towns merging into one another (NPPF para 134 b)). The policy proposal to prevent a range of neighbouring settlements from merging does not reflect the NPPF wording and is unnecessary.

**Q4. Is the creation of suitable alternative natural greenspace (SANG) to offset the impact of removing land from the Green Belt at Lytchett Matravers and Wareham justified? If so, is the wording of policy V2 in relation to this matter sufficiently clear and robust as to be effective?**

8. No comment.

# PURBECK LOCAL PLAN EXAMINATION

Statement on behalf of the Charborough Estate in respect of Morden Park and related SANG

Matter C : Green Belt; and

Matter H : Infrastructure

Participant No : 1190180

Prepared by Pro Vision on behalf of Charborough Estate



**MORDEN PARK**  
PROJECT NO. 2273

**PREPARED BY:**  
JAMES CLEARY, MA, MRTPI, Dip UD  
CONSULTANT

**DATE:**  
JUNE 2019

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## 1.0 Introduction and Relevant Background

- 1.1 The Charborough Estate is a traditional rural estate with a range of farms operating arable, grazing, forestry and parkland functions. It extends from Wareham and the Isle of Purbeck in the south up to the River Stour in the north. Morden Park is directly south of the historic settlement of Morden and about 3km north of Wareham.
- 1.2 Morden Park originated in the C19th as a private ornamental park with lakes for private use. The landscape has remained relatively unchanged since the C19th although the park is now in need of extensive works to uncover and repair original tracks, to remove invasive species, to dredge the lakes and streams to keep the waterways clear and to thin out and maintain various areas that are overgrown with trees and shrubs.
- 1.3 Over the last 10 years or so the Estate has been keen to promote the use of the site as restored parkland with holiday park accommodation for visitors to stay in. This would be in accord with the Council's tourism strategy and Dorset Districts Management Plan (2014) in that it should help steer visitors to a new destination away from the internationally significant Jurassic Coast.
- 1.4 The proposal was considered by the Inspector at the Examination in Public into the Purbeck Local Plan (Part 2) in 2012. At para 100 of his report it was concluded that a proposal to create a Country Park with some tourist accommodation at Morden Park was "a suitable use for such a site". However, it was deferred for the Local Plan Review as it was not considered to be a strategic proposal at that time.
- 1.5 Over recent years a significant amount of further work has been undertaken and pre-application discussions have taken place with Planning Officers, the Highway Authority, the Local Economic Development Officer and Natural England. Further studies have been undertaken, including two extensive Phase 1 Ecology Surveys and a viability study.
- 1.6 A Memorandum of Undertaking has been prepared in parallel with this Statement and it is now concluded that the Submission stage Modifications (MM18, MM19 and MM20) should be withdrawn such that the Review Local Plan reverts to its Pre-Submission Stage form with the Holiday Park site taken out of Green Belt.
- 1.7 The purpose of this Statement is to provide additional and relevant information on Examination Matter C: Green Belt and matter H : Infrastructure. In particular, account is taken of the Inspector's questions:

**Matter C: Issue 1, Q2** – the exceptional circumstances demonstrated to justify the alterations to the boundary of the Green Belt for the Morden park holiday park (NB the SANG is to remain in Green Belt; and

**Matter H: Issue 3, Policy I5 and Q3 (a) and (b)** – the need for Policy 15 to be justified, effective and consistent with national policy and the need or otherwise for Plan Submission Stage Modifications (MM15, MM19 and MM20).

## 2.0 The Position at Pre-Submission Draft Stage

- 2.1 In the run up to the preparation of the Review Local Plan the owners of Morden Park, their professional representatives and other parties including the LPA, the Highway Authority and Natural England worked closely together on proposals for the site. The Council's position was that the holiday park should enable delivery of the adjacent strategic SANG for mitigating against the negative effects of infill and windfall development in the northern part of the District. At that time the Council indicated that other matters should be addressed including:
- a) a sequential study to show that the SANG could not be delivered on any alternate site owned by the Estate in the northern part of the District; and
  - b) a viability to show that there was reasonable prospects of the holiday park and SANG proceeding and that the former could enable and fund the latter.
- 2.2 Matter a) was addressed and it is understood that the information provided was sufficient for Officers to conclude that there was no alternative acceptable or suitable site for a SANG within the Estate in the northern part of the District
- 2.3 Matter b) was considered internally by the Estate but not in a way that information could be shared with local authorities. The viability was complex as it needed to take account of holiday park and SANG construction costs, ongoing maintenance and assumptions on income streams in the context of changing economic and market circumstances without there being a firm proposal for development in place.
- 2.4 Despite the position on Matter b), the Council published the Pre-Submission Draft Plan with a proposal for the Morden Park site to be released for the Green Belt. It was agreed that delivery of the SANG (to be enabled by the holiday park) amounted to "Exceptional circumstances" needed to warrant the green belt release as part of the development plan process (NPPF para 136-137).
- 2.5 Representations were submitted on behalf of the Charborough Estate in support of this proposal (PLPP151). The Estate's position had historically been that the SANG and its delivery were not necessary to justify the allocation of the holiday park in light of the last Local Plan Inspector's comments, the tourism and other environment benefits. Notwithstanding this, the Estate is in a position to make available and deliver the SANG. It now agrees that this can be a linked proposal.

## 3.0 Submission Stage Modifications

- 3.1 At the Submission Stage the Council put forward 3 modifications that effectively reversed the position taken at Pre-Submission Stage. The Modifications and the parallel changes to the Plan Map resulted in the holiday park site being left in green belt and the SANG remaining as a strategic proposal albeit one that might be enabled by means other than the holiday park development.
- 3.2 Concerns over deliverability of the SANG in the absence of a viability was the main reason given for these late stage modifications (SDO1a).
- 3.3 This was a unilateral move on the part of the Council. It came as a complete surprise to the Estate and it's advisors or to Natural England. None of these parties had been told of any fundamental concerns or any deadline for submission of viability information. It did not necessarily rule out the Holiday Park development but if left in green belt there will be a need for "very special circumstances" to warrant development that would not normally be permitted.
- 3.4 The relevant Submission Stage Modifications are:
  - MM18 – Amendments to para 256
  - MM19 – Amendments to para 257
  - MM20 – Amendments to Policy I5
- 3.5 These further modifications are opposed by the Estate. They are not considered to be appropriate as:
  - a) By leaving the holiday park in the green belt it would be difficult for the Estate to find a development partner for the scheme. Hence, resulting in likely delay or possibly even non implementation despite the Council's indications that the "very special circumstances" test could be met.
  - b) The Estate may not wish to make land available for the strategic SANG if the holiday park scheme was not forthcoming. The SANG has a significant cost in terms of loss of productive arable land, adjustments to existing farming tenancy, works that need to be implemented to make it suitable for public greenspace and ongoing management and maintenance.
  - c) There is no evidence of any venture or development elsewhere in the northern part of the District that could enable / fund the above. Hence, its delivery was likely to be undermined.
  - d) The Estate had undertaken viability work to show that the holiday park could fund and deliver the SANG and related works proposed by Natural England but it had not got to the position whereby this information could be relayed in an appropriate format for Council scrutiny.

## 4.0 Subsequent Work and Discussions

- 4.1 Since the Submission of the Review Local Plan and publication of the Submission stage modifications a significant amount of further work has taken place in parallel with discussions between relevant parties. After joint meetings with Planning Officers, Natural England and representatives of the Estate a viability for a 100-unit holiday park scheme was prepared and shared with relevant parties. The viability was amended a number of times, but it is now agreed that the holiday park can deliver the strategic SANG and that the overall development would be viable over several stages albeit with returns on investment delayed for a number of years. This is a position the Estate is happy to accept.
- 4.2 The first meeting, after Submission of the Plan was attended by Estate representatives and Planning Officers. Thereafter work was undertaken on alternate forms of development taking into account constraints along with key factors necessary for successful delivery of both the holiday park as a commercial entity and the SANG as a separate but related proposal for mitigation of the effects of development of housing elsewhere in the northern part of the District.
- 4.3 Further meetings took place with Natural England, ecology consultants, Planning Officers and leisure park specialists. Various site surveys and inspections were also undertaken. An updated Phase 1 ecology survey was prepared and submitted to the Council and Natural England. This concluded that the impact of the holiday park development on the site was likely to be limited and that there were no foreseen obstacles to implement from an ecological perspective.
- 4.4 Planning Officers have also liaised internally with the Highway Authority. It was confirmed that a development with up to 100 holiday homes would normally have a low trip generation with most types likely to avoid peak travel times. A simple Transport Statement should be needed for the SANG (assuming car park with up to 30 spaces). However, the Morden Park Junction to the A35 is planned for improvements in the long term and land close to this junction that is needed could, in the Highway Authorities opinion, be made available as a “reasonable, logical and low-cost measure”. Whilst no specific details are available the Estate, as owners of land to the north and south of the junction, have indicated an in-principle acceptance of an agreement to this land reservation proposal (outside the holiday park and SANG development scheme).

## 5.0 The Memorandum of Understanding

- 5.1 After the completion of further work and discussions between relevant parties it was agreed that the position should be documented in the form of a Memorandum of Understanding. Signatures to the Memorandum would be Dorset Council, The Charborough Estate and Natural England. The Council have taken the lead in producing this and at the time of writing this Statement the MoU has been finalized in draft for signing.
- 5.2 The details set out in the MoU are not repeated here. However, it clearly documents “matters agreed” and “matters to be agreed” and it is relevant to note that:
- Matter C: Issue 1, Q2** – The SANG is to remain in Green Belt. The holiday park site should be taken out of green belt (proposed green belt release shown in plan on p9). The need for the SANG is identified in the NRA. It would be an alternative recreational space to Morden Bog and heath. The SANG delivery is enabled by the holiday park development. All parties agree that the SANG is achievable on site and the holiday park is capable of financing re SANG (with a contribution from the Council). These amount to ‘exceptional circumstances’ that justify the green belt release as part of the Review Local Plan.
- Matter H: Issue 3, Policy I5, Q3 (a) and (b)** – Policy I5 in respect of the SANG is justified for the reasons outlined above. The approach to be taken would be effective and consistent with national policy. There is now no need for Submissions Stage Modifications MM18, MM19 and MM20.
- 5.3 In summary, green belt boundary changes to enable the development of a holiday park at Morden Park are justified as the park would be delivered with a strategic SANG, the need for which is identified in the HRA. The provision of the SANG equates to exceptional circumstances.

(Consultee 1191476,1191015,1190535)

This statement is made on behalf of the 61 residents of Glebe Road in Lytchett Matravers who strongly oppose this proposed development of 95 houses on Green Belt Land.

## **Matter C**

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## Issue 1: Green Belt

### **Q1. Is the in-principle need to review the Green Belt fully evidenced and justified, effective and consistent with national policy including paragraphs 136 and 137 of the Framework?**

We would argue that the review is not compliant with the requirements of the NPPF in so much as it has not been demonstrated that all other reasonable options for development have been fully explored, before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries.

Para 137 of the NPPF requires that the Local Planning Authority has shown that the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

We have not seen any evidence showing that all suitable brownfield sites and underutilised land has been exhausted first. Although the Council have a brownfield register this does not cover an assessment of underutilised land. It is also limited to the Purbeck area, and has not examined opportunities in the wider Dorset Council area.

We have also seen no evidence to suggest that an uplift in minimum density standards in towns and city centres and other locations well served by public transport has been considered. There is no reference to this within the Local Plan, or a clear indication that consideration has been given to what areas are well served by public transport.

The Statement of Common Ground should set out what discussions the former Purbeck District Council would have had with adjoining authorities and their

ability to accommodate some of the identified need. This includes West Dorset and North Dorset, neither of which have Green Belt constraints, and have also been progressing a review of their Local Plans. Indeed the SoCG (see Appendix 1) shows that West Dorset's plan could exceed its requirements, which would suggest that it could potentially accommodate some of the need from Purbeck, and this may also be the case with North Dorset.

So this brings into question whether other more suitable towns and villages within the new Dorset Council district outside of Purbeck, could accommodate some of the need for development and that the release of Green Belt land may be avoidable.

**Q2. Have exceptional circumstances 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, Upton and Wareham and the Morden Park strategic alternative natural green space (SANG) and holiday park (Policy I5)?**

For the reasons given in answer to Q1, we strongly disagree that 'exceptional circumstances' have been demonstrated to justify the adjustment to the Green Belt boundary at Lytchett Matravers.

Furthermore, as part of the consultation process, in 2018 residents were asked to indicate their preference for where new homes should be built (see SD06d- New homes for Purbeck consultation report 2018). This gave three options:

- **Option A:** 470 homes at Wool, 440 homes at Redbridge Pit/Moreton Station, 90 homes at Upton, 150 homes at Lytchett Matravers and 250 homes on smaller sites
- **Option B:** 650 homes at Wool, 500 homes at Redbridge Pit/Moreton Station, 250 homes on smaller sites
- **Option C:** 800 homes at Wool, 600 homes at Redbridge Pit/Moreton Station

Option C clearly stated that the entire quota of homes required for the whole of Purbeck could in fact be accommodated without the need to remove land from the Green Belt.



Option C also performs better in terms of the sustainability appraisal process, as shown in the table in SD52-Sustainability Appraisal Strategic Environmental Assessment report January 2018 consultation

We have not been able to understand why Option C was rejected in preference to Option A, and can only presume it was based on public consultation responses. We cannot see how a vote, decided by a relatively small number of residents, can be termed exceptional circumstances to justify the development on Green Belt land.

Furthermore, clause 138 of the NPPF dictates that when it is necessary to release land from Green Belt, first consideration should be given to 'land which has been previously developed and/or well-served by public transport'. The land at Lytchett Matravers is neither of these. More detailed evidence on this is given in our response to Matter A. There is no railway. The only public transport available is an hourly bus service that only connects to Poole and does not run into the evenings, is more limited on Saturdays and non-existent on Sundays. It won't work for most employees. It doesn't help residents who are not able to walk long distances to access the facilities in Lytchett Matravers, as they would have to catch a bus to the centre of the village and returning would mean having to go via Poole, and face a minimum 2 hour round trip. Many people would understandably find the walk to the main food shop, village hall, library, pharmacy and doctor's surgery (all around 1.5km too far). It is perhaps worth noting that the Transport Background Paper (2018) prepared by Purbeck District Council does not include a single reference to Lytchett Matravers, and the only transport infrastructure funding priority proposed is the Swanage to Wareham Rail Reconnection.

The selection of sites for release from the Green Belt appears to have been undertaken on the basis of how much they currently contribute to its functioning (i.e. the extent to which it meets the 5 purposes of Green Belt land) and ignores the 'first consideration' points set out in NPPF para 138.

However even based on its own criteria, the land to the east of Wareham Road (SHLAA/0026) is part of the larger area of Green Belt land, Parcel 25, and overall, has been classed by the former District Council as making 'a significant contribution to the character of the countryside' and which 'serves as a strategic check on preventing the settlements of Lytchett Minster and Lytchett

Matravers from merging with one another'. SHLAA/0026 has always been a part of Parcel 25 and we cannot agree that exceptional circumstances exist to justify removing it from Parcel 25. Parcel 25 was also classified as having a greater importance to the Green Belt than any other parcel of Green Belt land around the village.

**Q3. Is policy V2 (Green Belt) consistent with national policy in so far as it relates to the purposes of the Green Belt? If not, would the change to the policy (MM2) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?**

Policy V2 does not meet the final criterion of national policy in assisting urban regeneration. This would provide more focus on options that would result in higher densities in more accessible locations such as the main towns and the conurbation, unlike Lytchett Matravers which is a dormitory village that does not have the services, infrastructure or employment to support significant levels of development.

## **Appendices: Matter C**

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Appendix 1: Statement of Common Ground

Appendix 2: Summary of Alternative Site / policy options

## Appendix 1: Statement of Common Ground

Local plan review	Current/last stage	Proposed figure in local plan review	Likelihood of OAN being met in local plan review
Bournemouth	Reg 18 Issues and Preferred Options to go to Cabinet for approval	Not yet determined	Risk of not being met
Christchurch	Reg 18 Options consultation July-September 2018	5,270 (2013-2033): 263 per annum	Not being fully met (up to 2033)
East Dorset	Reg 18 Options consultation July-September 2018	8,854 (442.7 per annum)	Being met up to 2033
North Dorset	Reg 18 Issues and Options consultation	Not yet determined (but aiming to meet in full)	Not yet known
Poole	Post-examination	14,200 (2013-2033): 710 per annum	SHMA figures being met (to 2033) but new methodology figures to be considered in next review
Purbeck	Preparing for pre-submission	2,688 (168 per annum)	Intending to meet requirements up to 2034
West Dorset and Weymouth & Portland	Reg 18 Preferred Options consultation	Supply 19,116 (2016-2036): 955.8 per annum, against target of 15,880 or 794 per annum	Likely to be fully met or exceeded (to 2036)

Table 4: Latest housing numbers in local plans

## Appendix 2: Summary of Alternative Site / policy options

Stage B3: Evaluating the likely effects of the plan including a summary of alternative sites / policy options :

The table below shows a summary of the assessment of alternatives. Detailed discussion together with any necessary mitigation can be found in the appendices. The scores below are based on the average score of the short, medium and long term predicted effects as identified in the appendices.

List of alternative policies assessed against SA Framework	Meet as much of Purbeck's housing need as possible	Promote services and facilities where need is identified	Harness the economic potential of tourism and widen employment opportunities	Help everyone access basic services, reduce the need to travel by car & encourage cycling, walking and use of public transport?
<b>Housing site allocations</b>				
Option A: 470 Wool, 440 Redbridge Pit/Moreton Station, 150 L Matravers, 90 Upton + 250 extra.	++	+	+	+
Option B: 650 Wool, 500 Redbridge Pit/Moreton Station + 250 extra.	++	+	+	+
Option C: 800 Wool, 600 Redbridge Pit/Moreton Station. No spread.	++	++	++	++

assessed against SA objectives

Necessary mitigation can be found in the appendices. The scores below are based on the average

Reduce vulnerability to flooding and coastal change, and plan for climate change	Protect & enhance habitats and species and local Geodiversity	Protect & enhance Purbeck's unique landscape & townscape, & cultural & historical assets?	Minimise all forms of pollution and consumption of natural resources.
n	n	n	-
n	n	n	-
n	n	n	-

(Consultee 1191476,1191015,1190535)

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ability to accommodate some of the identified need. This includes West Dorset and North Dorset, neither of which have Green Belt constraints, and have also been progressing a review of their Local Plans. Indeed the SoCG (see Appendix 1) shows that West Dorset's plan could exceed its requirements, which would suggest that it could potentially accommodate some of the need from Purbeck, and this may also be the case with North Dorset.

So this brings into question whether other more suitable towns and villages within the new Dorset Council district outside of Purbeck, could accommodate some of the need for development and that the release of Green Belt land may be avoidable.

**Q2. Have exceptional circumstances 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, Upton and Wareham and the Morden Park strategic alternative natural green space (SANG) and holiday park (Policy I5)?**

For the reasons given in answer to Q1, we strongly disagree that 'exceptional circumstances' have been demonstrated to justify the adjustment to the Green Belt boundary at Lytchett Matravers.

Furthermore, as part of the consultation process, in 2018 residents were asked to indicate their preference for where new homes should be built (see SD06d- New homes for Purbeck consultation report 2018). This gave three options:

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We have not been able to understand why Option C was rejected in preference to Option A, and can only presume it was based on public consultation responses. We cannot see how a vote, decided by a relatively small number of residents, can be termed exceptional circumstances to justify the development on Green Belt land.

Furthermore, clause 138 of the NPPF dictates that when it is necessary to release land from Green Belt, first consideration should be given to 'land which has been previously developed and/or well-served by public transport'. The land at Lytchett Matravers is neither of these. More detailed evidence on this is given in our response to Matter A. There is no railway. The only public transport available is an hourly bus service that only connects to Poole and does not run into the evenings, is more limited on Saturdays and non-existent on Sundays. It won't work for most employees. It doesn't help residents who are not able to walk long distances to access the facilities in Lytchett Matravers, as they would have to catch a bus to the centre of the village and returning would mean having to go via Poole, and face a minimum 2 hour round trip. Many people would understandably find the walk to the main food shop, village hall, library, pharmacy and doctor's surgery (all around 1.5km too far). It is perhaps worth noting that the Transport Background Paper (2018) prepared by Purbeck District Council does not include a single reference to Lytchett Matravers, and the only transport infrastructure funding priority proposed is the Swanage to Wareham Rail Reconnection.

The selection of sites for release from the Green Belt appears to have been undertaken on the basis of how much they currently contribute to its functioning (i.e. the extent to which it meets the 5 purposes of Green Belt land) and ignores the 'first consideration' points set out in NPPF para 138.

However even based on its own criteria, the land to the east of Wareham Road (SHLAA/0026) is part of the larger area of Green Belt land, Parcel 25, and overall, has been classed by the former District Council as making 'a significant contribution to the character of the countryside' and which 'serves as a strategic check on preventing the settlements of Lytchett Minster and Lytchett

Matravers from merging with one another'. SHLAA/0026 has always been a part of Parcel 25 and we cannot agree that exceptional circumstances exist to justify removing it from Parcel 25. Parcel 25 was also classified as having a greater importance to the Green Belt than any other parcel of Green Belt land around the village.

**Q3. Is policy V2 (Green Belt) consistent with national policy in so far as it relates to the purposes of the Green Belt? If not, would the change to the policy (MM2) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?**

Policy V2 does not meet the final criterion of national policy in assisting urban regeneration. This would provide more focus on options that would result in higher densities in more accessible locations such as the main towns and the conurbation, unlike Lytchett Matravers which is a dormitory village that does not have the services, infrastructure or employment to support significant levels of development.

# **Appendices: Matter C**

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Appendix 1: Statement of Common Ground

Appendix 2: Summary of Alternative Site / policy options

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<b>Housing site allocations</b>				
Option A: 470 Wool, 440 Redbridge Pit/Moreton Station, 150 L Matravers, 90 Upton + 250 extra.	++	+	+	+
Option B: 650 Wool, 500 Redbridge Pit/Moreton Station + 250 extra.	++	+	+	+
Option C: 800 Wool, 600 Redbridge Pit/Moreton Station. No spread.	++	++	++	++

assessed against SA objectives

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Reduce vulnerability to flooding and coastal change, and plan for climate change	Protect & enhance habitats and species and local Geodiversity	Protect & enhance Purbeck's unique landscape & townscape, & cultural & historical assets?	Minimise all forms of pollution and consumption of natural resources.
n	n	n	-
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n	n	n	-

(Consultee 1191476,1191015,1190535)

This statement is made on behalf of the 61 residents of Glebe Road in Lytchett Matravers who strongly oppose this proposed development of 95 houses on Green Belt Land.

## **Matter C**

### **Contents:**

Issue 1: Green Belt

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## Issue 1: Green Belt

### **Q1. Is the in-principle need to review the Green Belt fully evidenced and justified, effective and consistent with national policy including paragraphs 136 and 137 of the Framework?**

We would argue that the review is not compliant with the requirements of the NPPF in so much as it has not been demonstrated that all other reasonable options for development have been fully explored, before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries.

Para 137 of the NPPF requires that the Local Planning Authority has shown that the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

We have not seen any evidence showing that all suitable brownfield sites and underutilised land has been exhausted first. Although the Council have a brownfield register this does not cover an assessment of underutilised land. It is also limited to the Purbeck area, and has not examined opportunities in the wider Dorset Council area.

We have also seen no evidence to suggest that an uplift in minimum density standards in towns and city centres and other locations well served by public transport has been considered. There is no reference to this within the Local Plan, or a clear indication that consideration has been given to what areas are well served by public transport.

The Statement of Common Ground should set out what discussions the former Purbeck District Council would have had with adjoining authorities and their

ability to accommodate some of the identified need. This includes West Dorset and North Dorset, neither of which have Green Belt constraints, and have also been progressing a review of their Local Plans. Indeed the SoCG (see Appendix 1) shows that West Dorset's plan could exceed its requirements, which would suggest that it could potentially accommodate some of the need from Purbeck, and this may also be the case with North Dorset.

So this brings into question whether other more suitable towns and villages within the new Dorset Council district outside of Purbeck, could accommodate some of the need for development and that the release of Green Belt land may be avoidable.

**Q2. Have exceptional circumstances 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, Upton and Wareham and the Morden Park strategic alternative natural green space (SANG) and holiday park (Policy I5)?**

For the reasons given in answer to Q1, we strongly disagree that 'exceptional circumstances' have been demonstrated to justify the adjustment to the Green Belt boundary at Lytchett Matravers.

Furthermore, as part of the consultation process, in 2018 residents were asked to indicate their preference for where new homes should be built (see SD06d- New homes for Purbeck consultation report 2018). This gave three options:

- **Option A:** 470 homes at Wool, 440 homes at Redbridge Pit/Moreton Station, 90 homes at Upton, 150 homes at Lytchett Matravers and 250 homes on smaller sites
- **Option B:** 650 homes at Wool, 500 homes at Redbridge Pit/Moreton Station, 250 homes on smaller sites
- **Option C:** 800 homes at Wool, 600 homes at Redbridge Pit/Moreton Station

Option C clearly stated that the entire quota of homes required for the whole of Purbeck could in fact be accommodated without the need to remove land from the Green Belt.



Option C also performs better in terms of the sustainability appraisal process, as shown in the table in SD52-Sustainability Appraisal Strategic Environmental Assessment report January 2018 consultation

We have not been able to understand why Option C was rejected in preference to Option A, and can only presume it was based on public consultation responses. We cannot see how a vote, decided by a relatively small number of residents, can be termed exceptional circumstances to justify the development on Green Belt land.

Furthermore, clause 138 of the NPPF dictates that when it is necessary to release land from Green Belt, first consideration should be given to 'land which has been previously developed and/or well-served by public transport'. The land at Lytchett Matravers is neither of these. More detailed evidence on this is given in our response to Matter A. There is no railway. The only public transport available is an hourly bus service that only connects to Poole and does not run into the evenings, is more limited on Saturdays and non-existent on Sundays. It won't work for most employees. It doesn't help residents who are not able to walk long distances to access the facilities in Lytchett Matravers, as they would have to catch a bus to the centre of the village and returning would mean having to go via Poole, and face a minimum 2 hour round trip. Many people would understandably find the walk to the main food shop, village hall, library, pharmacy and doctor's surgery (all around 1.5km too far). It is perhaps worth noting that the Transport Background Paper (2018) prepared by Purbeck District Council does not include a single reference to Lytchett Matravers, and the only transport infrastructure funding priority proposed is the Swanage to Wareham Rail Reconnection.

The selection of sites for release from the Green Belt appears to have been undertaken on the basis of how much they currently contribute to its functioning (i.e. the extent to which it meets the 5 purposes of Green Belt land) and ignores the 'first consideration' points set out in NPPF para 138.

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n	n	n	-
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## Inspector's Matters, Issues and Questions (MIQs)

## Matter C: Green Belt

## Issue 1: Green Belt

## Q 1)

*Q6. (a) Having regard to the provisions of the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008, when is the wider plan for the new unitary authority, within which the area covered by the Purbeck Local Plan falls, intended to be brought forward?*

*(b) What, if any, are the implications of this for the examination of the Purbeck Local Plan and should the Purbeck Local Plan explain this?*

Library document: [SD52-Sustainability Appraisal strategic Environmental Assessment report January 2018 consultation](#)

**Green Belt**

1. Responses: Sustainability Appraisal, SHLAA, Rural Functionality Study

**Answer to question 1**

2. Green Belts were started in 1947 to prevent urban sprawl from major cities.
3. In 1947 very few people owned a motor car and most people travelled by bus or train.
4. Now the vast majority of journeys are by private car and people commute by car and to a lesser extent by train from settlements beyond the Green Belt.
5. As a result the urban sprawl from cities now jumps over the Green belt and the housing needed is added to the housing totals of the districts and cities beyond the Green Belt.
6. In Purbeck a significant number of people commute by car to work in Poole and Bournemouth. This is apparent from the queues of cars on the A351 at peak periods in the winter, ie out of the tourist season.
7. This has resulted in the Purbeck housing total being primarily being satisfied in two locations, Wool and Moreton Station/Redbridge Pit 20 to 25 miles from Poole simply to maintain the Green Belt.
8. The Green Belt has not stopped urban sprawl but merely passed it on, in this case to Purbeck.
9. Instead of the sprawl just being confined to around Poole it now spreads out all across Purbeck as more people take advantage of the rural/urban life style the Green Belt has created.
10. Essentially the Green Belt has been made redundant by the motor car and the concern about sprawl around cities has been replaced by concern about sprawl over a much wider area, in this case across the whole of Purbeck.
11. If the Green Belt were dropped far more houses would be built around Poole and far fewer in Purbeck.

