

Inspector's Matters, Issues and Questions (MIQs)

Matter E: Housing

Issue 1: Housing Allocations

Library documents:

[SD06d-New homes for Purbeck consultation report 2018](#)

[SD54-Site Selection Background Paper Jan 2018 Consultation](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD20-Strategic housing market area assessment \(SHMA\)2018 update](#)

[SD19-Housing background paper](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q.1

Q1. (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?

(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

Answer to question 1.a

Soundness

2. The allocations to Lytchett Matravers and Upton are sound.
3. The allocation to Wool is sound but should be reduced to about 200 houses and the other 240 houses allocated to Swanage and Wareham
4. The allocation to Moreton Station/Redbridge Pit is very unsound and totally illogical.

Lytchett Matravers and Upton

5. The allocations at Lytchett Matravers and Upton are soundly based.
6. As I have described earlier, approximately 80% of Purbeck's population lives east of the Worgret Bridge and, therefore, a similar proportion of the housing allocations should also be east of the Worgret Bridge to provide housing, especially affordable housing for the 80% of residents who live in the east.

7. Also the increasing loss of employment due to the introduction of AI, robots etc will mean that it is highly likely that more people will need to travel to the conurbation to undergo training in the new technologies and to subsequently find work.
8. It is, therefore, important to provide homes in the east of the district for the increasing number of people who will commute from Purbeck into the conurbation.
9. This would be helped if the allocated to Lytchett Matravers was made larger. There is ample scope to expand the village into the Green Belt without harm to the village or the Green Belt's ability to stop urban sprawl from Poole.

Moreton Station/Redbridge Pit

10. This housing allocation is totally illogical.
11. Moreton Station is over 10 miles, from the Worgret Bridge (including 5 miles along a single carriage road) and, therefore, over 10 miles from the approximately 80% of Purbeck population who live east of the Worgret Bridge.
12. Moreton Station is about 5 miles from Dorchester and hence the allocation to Moreton Station/Redbridge Pit is an allocation primarily for people in Dorchester and West Dorset who need a home. In particular the 196 affordable homes part of the 490 home allocation (the largest single affordable homes allocation in the Local Plan) would very likely be taken up by the residents of Dorchester and West Dorset and lost to the people of Purbeck.
13. Redbridge Pit is effectively in Crossways.
14. Crossways is officially a dormitory of Dorchester (Inspector's report on the West Dorset Local Plan Examination).
15. There are only 2 top up shops in Crossways (none in Moreton Station), virtually no employment, and an overburdened health centre (a GP surgery in another village shut down and the patients were transferred to Crossways surgery).
16. 1.9% of Crossways population travel to work by train (2011 Census) and only 2% use the bus service (DCC statistic).
17. West Dorset have approved plans for 500 houses to be built only yards from Redbridge Pit and have allocated a further 614 houses in their November 2018 Local Plan Preferred Options. A total addition to Crossways of 1114 houses. Crossways currently has approximately 1100 houses. The addition of Purbeck's houses would bring the total allocation to Crossways to 1604 houses, 3273 people and 2266 cars (using the 2011 Census ratios). It is likely that 2 very large quarries in Moreton will be granted approval this year. A DCC Traffic Impact Study indicates that there may be congestion on the main road through Crossways at peak times
18. Nowhere else in Dorset has this scale of development.
19. The Purbeck housing allocation of 490 homes plus a 65 bed care home, effectively to Crossways, is totally and irrefutable illogical and wrong.

Wool

20. Wool is approximately twice the size of Crossways and approximately 25 times larger than Moreton Station, yet has a lower housing allocation than Moreton Station.
21. The surrounding landscape has not been scared and will not be scarred by quarries.
22. It is adjacent to the Winfrith Innovation Park.
23. It has a range of shops and services.
24. It is 5 miles along an 'A' road to the Worgret Bridge, to the east of which live approximately 80% of Purbeck's population.
25. There is logic in an allocation to Wool but of about 200 houses, with the other 240 being allocated to Swanage, or failing that to Wareham. These are the major urban centres in Purbeck, and Swanage in particular merits a large housing allocation.

Question 1.b.

(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

26. The allocations to Moreton Station/Redbridge Pit, Wool, Lytchett Matravers and Upton have been made because landowners at each location offered land for housing.
27. Because of the illogicality of Purbeck Council in treating the AONB as sacrosanct, no allocations have been made in the AONB. The reason why some sites have been selected and others not used in SD52 and the Sustainability Assessment is very subjective and mostly illogical.
28. For example much of the land west of Wareham is very suitable for housing but has not been used. Instead Purbeck's largest housing allocation plus a 65 bed care home have been allocated over 10 miles away in the already over-developed and over-burdened Dorchester dormitory village of Crossways for use primarily by people from Dorchester. Housing on Redbridge Pit would be closer to the centre Crossways and Dorchester than some houses in Crossways.
29. The assessment of sites was not robust, very subjective and for the most part illogical.

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Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q.2

Q2. 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))?

Answer to question 2

Moreton Station/Redbridge Pit

2. There is no robust evidence to support the allocation of a 65 bed care home on Redbridge Pit in Crossways because there is no robust evidence.
3. The care home will be at least 10 miles away from where approximately 80% of Purbeck's population lives.
4. Redbridge Pit is essentially in the Dorchester dormitory of Crossways.
5. Residents will effectively be marooned on a fairly bland site, remote from friends and family who may live over 10 miles away to the east of the Worgret Bridge, or in Dorchester 5 miles away or further. Their only sign of life will be the hourly sound of the Weymouth bound train sounding its horn as it approaches Moreton level crossing.
6. Redbridge Pit is the very opposite of the ideal location for a care home, which is to be located in the centre of a lively town where friends and family can pop to chat and short trips can be made to the shops and services, the theatre or cinema and other events in the town.
7. A trip to Dorchester or Wareham from Redbridge Pit would be something of an endurance test for the residents of the care home.

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Q.4

Q4. Are the assumptions regarding capacity of each of the allocations justified and based on available evidence?

Answer to question 4

2. This question highlights the complete lack of any references in this Local Plan and its documents.
3. I don't know which document contains the *assumptions regarding capacity of each allocation*.
4. The Local Plan itself provides no references nor any justification for the number of houses in the allocation for Redbridge Quarry.
5. Given that the 2016 Options consultation referred to an allocation of 500 houses at Redbridge Pit I assume that the proposer of the Redbridge Pit site has simply subtracted a figure for the size of a typical 65 bed care home, subtracted an allowance for a SANG, and divided the remaining hectares of the site by the average size of a typical new build house to give an indication of the maximum number of houses that could be built on the site.
6. The figure of 490 houses corresponds roughly with the 500 houses planned on the almost adjacent Summer Farm estate which will also have a SANG. The approved Summer Farm development (not yet built) village hall, health centre and associated parking areas could be said to have a land area roughly equivalent to that for the 65 bed care home. On this basis the Redbridge Pit land area roughly corresponds to that for the 500 House Summer Farm development and as such indicates that Redbridge Pit will accommodate the proposed allocation.
7. This question highlights that there is no summary document which draws together all the relevant documents and provides references to both the documents and the relevant parts of the document.
8. The reader is left to hunt through the library and select by title and then check the index and contents to find details.
9. This process pervades the process of answering the MIQs, and responding to consultations.

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Q.5

Q5. Is there robust evidence that the development of the allocations is viable and deliverable?

Answer to question 5

2. There does not appear to be any evidence about the development of the allocations.
3. Which is not to say that it is not there, simply that it does not appear to be in the Local Plan or the Library.
4. This highlights a basic flaw with the Local Plan process. The almost complete lack of references in the Local Plan to its supporting documents. The reader is left to find a document in the library and scan it to find out whether it covers a specific topic
5. With so many large documents in the library and the fact that the Local Plan itself is so limited in detail and not well constructed, it is a major task finding out the background and justification for statements and policies in the Local Plan.
6. For example the process of finding out how the housing numbers have been calculated requires the reader to do the calculations, since that the Local Plan and its documents only cover this issue in narrative form.
7. Because the Local Plan does not discuss development in Crossways it does not take account of the approved and planned housing developments in Crossways.
8. In Crossways the planning applications for the 500 houses on Summer Farm, the 49 houses on Land adjacent to Oaklands Park and the 85 houses on land adjacent to Frome Valley Road have all been approved for a number of years but there has been absolutely no activity on any of these sites, let alone house building, and none appears to be imminent.
9. This is despite past assurances from the developers that these 634 houses will be built.

10. If work starts on one or more of the other developments first, it is likely that it may well utilise the majority of the available building manpower and hence it may be some time before a start is made on the proposed Redbridge Pit development.
11. Thus it cannot be said that there is robust evidence when the proposed allocation on Redbridge Pit will be built.
12. Building work in Crossways may have a knock-on effect for the amount of labour available to build the 470 house allocation in Wool.
13. The building work for the 65 bed care homes in Redbridge Pit and Wool may be more complicated than simply building houses and hence their delivery may take longer than the construction of the houses.
14. Also the Poundberry development uses a large number of available local building workers.

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Q.6

Q6. (a) *What are the assumptions about the scale and timing of supply and the rates of delivery?*

(b) *Are the assumptions realistic?*

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

NB. The Council is requested to produce a detailed spreadsheet setting out how many dwellings each site is expected to deliver in each year of the plan along with evidence to justify the delivery information it contains.

Answer to question 6

2. It is impossible to answer this question without the spreadsheet referred to in the NB note.
3. The NB note reinforces the point in I made in my answer to question 5, that there is a lack of evidence and references to evidence in the Local Plan.

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1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q.7

Q7. (a) Are the policy criteria set out in the relevant policies justified and effective?

(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?

Answer to question 7 (a)**Policy H4 Moreton Station/Redbridge Pit**

2. There are 2 significant details before starting on the content of Policy H4.
3. Redbridge Quarry is located on Moreton Pit. The map on page 53 of the Pre-Submission Draft shows the site as Moreton Pit and this is the name used on maps by the Ordnance Survey and others. There is no such place as Redbridge Pit. Redbridge Quarry operates on Moreton Pit
4. As the map on page 53 shows, Moreton Pit is not in Moreton Station. Moreton Pit has the word Crossways on its bottom left corner and the site directly adjoins Crossways on Redbridge Road. The site is separated from Moreton Station by the barrier of the railway and gates on the B3390 where the road crosses the railway line.
5. The errors and unreality of the main text and the supporting paragraphs would take many more words than are allowed in the Inspector's MIQs guidance.
6. For example the site is most unlikely to be restored by 2022; there is no walking or cycle route to the Dorset Innovation Park to improve, there are virtually no local employers; the railway station is not an interchange as it is not accessed by any other form of public transport; a traffic impact statement incorporating the proposed development has already been produced and Network Rail are hoping to convert the single barriers to double gates; the DCC traffic impact statement and the approved Summer Farm development have already proposed improvements to the B3390 road; the Summer Farm development will also use the 5 way junction; Crossways starts on Redbridge Road at the entrance to the

site and so it is not obvious what is meant by pedestrian and cycle access to Crossways. The proposal to avoid, mitigate or remediate the noise of the train is interesting since the sound of the horn as trains approach Moreton Station is audible at least a mile away from the point at which the horns are used.

7. The criteria only mentions Crossways in sub-paragraph g in connection with the 5 ways road junction and access to Crossways, ignoring the fact that the development will effectively be in Crossways.
8. Criteria H4 totally ignores the fact that 500 houses are planned to be built within a short distance of Redbridge Pit and 614 houses are proposed to be built not very far away in Crossways, and the fact that the Redbridge Pit residents will have to share all the services and facilities in Crossways with the new residents of Crossways on the approved and planned developments and the existing population of Crossway.
9. The map on page 53 does not show any quarries despite the approved Woodsford quarry running across land to the north of the railway and the soon to be approved Station Road Quarry in close proximity to Redbridge Pit.
10. It is interesting that criteria H4 provides nothing tangible for Crossways or Moreton other than a reference to *..community facilities and supporting infrastructure...* in the opening statement. The requirement to make financial contributions to local health infrastructure and education is believed to be a legal requirement.
11. The criteria H4 appears to indicate in sub-paragraph d that the caravan park will be used for housing. There was originally a proposal that the caravan park would move to land north of Moreton Station at about the point where the C road leads west from the B3390 to Woodsford. During the Mineral Sites Plan examination site visits it was stated that this proposal has now been dropped by the landowner.
12. It would be very helpful if the criteria could state precisely whether the caravan site is to be used for housing and if so where the caravan park is to be relocated in Moreton.

Policies H5: Wool; H6: Lytchett Matravers; H7: Upton

13. These appear much more realistic than Policy H4
14. They have the great benefit that these criteria cover the only development to take place in their subject locations.

Answer to question 7 (b)

15. No.

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Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q.8

Q8. *(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?*

(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?

Answer to question 8 (a)

Moreton Station/Redbridge Pit – Policy H4

2. The map on page 53 for Moreton Station/Redbridge Pit does not show a SANG.
3. There is no reference to a SANGS in Criterial H4 or the supporting text on pages 53 and 54.
4. Therefore, there is no certainty about a SANGS being provided.

Wool (Policies H5), Lytchett Matravers (Policy H6), Upton (Policy H7)

5. For similar reasons to those stated above for Redbridge Pit, there is no certainty of a SANGS being provided for Wool, Lytchett Matravers, and Upton.

Answer to question 8 (b)

6. I am not sure about interpreting the Ancient Woodlands policy in the NPPF.

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1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q.9

Q9. *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?*

Answer to question 9

2. Yes.
3. Regrettably this question highlights the problem with the Local Plan. It is vague, lacks references, and it is very difficult to ascertain how the housing numbers have been derived and how they are to be fulfilled. There is no cross-relation between documents. There appear to be inconsistencies in the way a number of subjects are treated.
4. For example Swanage is included in one table of numbers but is not included below, and according to the Swanage Local Plan page 11 there is some doubt as to whether it is correct to include the 150 houses allocated as part of the Swanage Local Plan in the Purbeck Local Plan. Previous consultations have not included Swanage.
5. Also Policy V1, Wareham, has the words including windfall against the Neighbourhood Plan total of 300. Does this mean that if say a windfall of 20 houses arises then the Neighbourhood Plan need only be 280?
6. The numbers in the question are given in the table below.
7. The table illustrates a major failing with the Local Plan which I have already raised. My table below is the only place where the three policies are drawn together in one place. In the Local Plan 27 pages separate Policy V1 Spatial Strategy (page 21) from Policy H1 Local Housing Requirement (page 48) and 31 pages separate the Spatial Strategy from Policy H2 The Housing Land Supply (page 52) which incorporates the Spatial Strategy. This illustrates how a straight forward subject is made very confusing.

8. It appears that the Local Housing Requirement in Policy H1 is 2,688 houses over the period 2018 to 2034 and that sites have been identified in Policy H2 which will provide 2,688 houses.
9. The sites to provide the 2688 houses comprise named sites, Neighbourhood Plan sites, windfall within existing sites and small sites adjacent to existing sites.
10. The named sites and Neighbourhood Plan sites are termed strategic sites and given in Policy V1.
11. The Policies are confused because the Spatial Strategy includes windfall in Wareham.
12. Policy H2 includes all windfall not just in Wareham, and unnamed small sites adjacent to existing sites.
13. Since the Local Housing Requirement is in effect a strategic requirement: the Government requires this number of houses to be built, then in effect all sites including windfall are strategic sites because the Local Plan requires them in order to meet its strategic housing target.
14. In reality distinguishing a housing land supply as being formed of Strategic Sites and other sites confuses the issue and should be abandoned. All the sites are strategic, whether named, unnamed or windfall.

Purbeck LP Housing Totals		
		Houses
Policy H1 Local Housing Requirement (page 48)	2,688	
Policy V1 Spatial Strategy (page 21)		
H4: Moreton Station/Redbridge Pit (page 55)	490	
H5: Wool (page 58)	470	
H6: Lytchett Matravers (page 61)	150	
H7: Upton (page 63)	90	
Neighbourhood Plans		
Wareham (including windfall)		300
Bere Regis		105
	Total	1605
Policy H2 The housing Land Supply (page 52)		
Moreton Station/Redbridge Pit	490	
Wool	470	
Lytchett Matravers	150	
Upton	90	
Neighbourhood Plans		
Wareham (including windfall)		300
Bere Regis		105
Swanage Local Plan allocation (but see page 11 of the Swanage LP)		150
Small sites next to existing sites and windfall within settlements (excluding Wareham)		933
	Total	2688

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Q.10

Q10. 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?

Answer to question 10

2. No.
3. The Policies H4,H5, H6 and H7 do not fulfil the requirements of paragraph 16 sub-paragraph d). They are not *clearly written and unambiguous*.
4. My comments in answer to Question 7 illustrate the major errors and problems with Policy H4 Moreton Station/Redbridge Pit.
5. Policies H5, H6 and H7 are better but still do not fully meet the requirements in paragraph 16 sub-paragraph d).
6. Policy H4 (Moreton Station/Redbridge Pit) does not contribute *to the achievement of sustainable development* as required by sub-paragraph a)
7. Only 1.9% of the Crossways population travel to work by train (2011 Census) and only 2% travel by bus (DCC statistic) All other journeys are by conducted by car which apart from journeys to London is far less time consuming and cheaper.
8. All children after attending the First school in Crossways travel by bus for their education at the Middle and Upper school level.
9. There is virtually no employment in or near Redbridge Pit/Moreton Station.
10. Both Wool and Lytchett Matravers are effectively dormitories, Wool for Dorchester and Poole and Lytchett Matravers for Poole and as such are not sustainable locations and do not fulfil paragraph 16 sub-paragraph a).

Inspector's Matters, Issues and Questions (MIQs)

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Issue 2: Housing Land Supply (Policy H2)

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Q.1

Q1. Is the distribution of housing as set out in policy H2 (The housing land supply) consistent with the overall spatial strategy?

Answer to question 1

2. No.

3. Purbeck Council states on page20 in paragraph 41 that:

The most favoured option from the results of the consultation was the one that sought to spread development as much as possible, including releasing some areas of the green belt for homes as well as providing homes in the less environmentally constrained west of the District. It also included the use of smaller sites geographically spread across the District subject to the criteria outlined in a small sites policy.

4. Purbeck Council says in the Local Plan that it has implemented this option but in reality it has not.
5. As I have shown in my Spatial Strategy response, in the chart titled *Right Homes in the Wrong Place*, over 79% of Purbeck's population lives east of the Worgret Bridge just to the west of Wareham but 61% of the housing allocations are the west of a line through Wool.
6. The 83 houses in Moreton Station represent 0.4% approximately of Purbeck's housing total of 21,997 houses, but 28% of the housing allocations in the Local Plan are proposed to be located in Moreton Station/Redbridge Pit.
7. This is perverse in the extreme and represents a total waste of Purbeck's housing supply up to 2034.
8. My *Right Homes in the Wrong Place* chart shows that 40.5% of Purbeck's existing housing is in the AONB and 22.8% is in the Green Belt.
9. No houses have been allocated to the AONB and to Swanage in particular.
10. The Wareham Neighbourhood Plan aims to locate 300 houses in the Green Belt and the plan has allocated 150 houses in the Green Belt in Lytchett Matravers.

11. These are relatively small numbers compared to the number of people who live in the Green Belt and to the east of the Worgret Bridge.
12. The simple fact is that approximately 80% of Purbecks population lives to the east of the Worgret Bridge and very few houses are allocated to the east of the district and none to the south in the AONB.
13. This blatantly does not *spread development*.
14. The Local Plan donates its largest allocation, 490 houses, and largest single allocation of affordable houses, 196 houses, to Dorchester and West Dorset in Crossways, even though the Local Plan states on page 71 in paragraph 161 that:

The provision of affordable housing is a major priority for Purbeck District Council.

15. This is dramatically letting down the people of Purbeck who need affordable homes where they currently live east of the Worgret Bridge not over 10 miles away to the west down a road which is single carriage for part of its length.

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Q.2

Q2. *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?*

Answer to question 2

2. West Dorset Council has given approval for 500 home in Crossway and allocated 614 houses to Crossways in its Preferred Options.
3. Thus it should theoretically be possible to deliver the types of housing identified in the SHMA at Redbridge Pit given the very large number of houses approved and proposed for Crossways.
4. But because the Redbridge houses will be in a Dorchester dormitory they will probably be taken up by Dorchester residents and lost to Purbeck.

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Issue 2: Housing Land Supply (Policy H2)

Library documents:

[SD06d-New homes for Purbeck consultation report 2018](#)

[SD54-Site Selection Background Paper Jan 2018 Consultation](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD20-Strategic housing market area assessment \(SHMA\)2018 update](#)

[SD19-Housing background paper](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q4

Q4. 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)?

Answer to question 4

2. Effectively the 933 dwellings are wishful thinking.
3. The combination of small sites and windfall sites represents too large a risk in supply of housing.
4. As I have already indicated the introduction of AI, robots, 5G communications and driverless vehicles will make a profound impact on all aspects of society in Purbeck and Dorset.
5. These technologies may result in the loss of employment for up to 40% of the working population and this may cause more people to migrate to work in the conurbation or further afield.
6. It would be wiser to allocate more homes in the east of the district so that people are able to commute to work in Poole and Bournemouth.

Inspector's Matters, Issues and Questions (MIQs)

Matter E: Housing

Issue 2: Housing Land Supply (Policy H2)

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Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q5

Q5. 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?

Answer to question 5

2. Paragraph 68 of the Framework refers to meeting 10% of a housing target through small sites.
3. Purbeck Council's proposal to meet 35% of its housing through small sites does not fit with the NPPF paragraph 68.
4. On my Right Homes in the Wrong Place chart I have identified in a column to the right of each settlement's name whether the town or village is in the AONB, in the Green Belt or not in either.
5. Of Purbeck's approximately 27 settlements only 6 are not in either the AONB or the Green Belt.
6. If the Purbeck ban on any housing in the AONB is applied to small sites and changes to the Green Belt are resisted then the small sites policy would have to be split between the 6 remaining sites. This equates to 155 houses for each of the six sites.
7. If the 933 houses were spread across all the 27 settlements this would mean each receiving 34 houses.
8. If Policy H8 maximum size of a small site is 30 homes (page 66 Policy H8 sub-paragraph a.) then to achieve 933 houses equally would mean that Purbeck would need 31 settlements. But it only has 27 and hence even if every settlement in Purbeck were allocated a small site of 30 homes, there aren't enough settlements and 123 houses out of the 933 would remain unallocated.
9. Settlements 18 to 27 have about 88 or less houses and hence a small site of 34 houses would represent almost 50% of the current size of the settlement and, therefore, could hardly count as a small site.

10. If settlements 18 to 27 receive 10 houses each which would be 11% for settlement 18 and about 26% for settlement 27, this would total 90 houses leaving 843 (933-90) houses to spread between the remaining 17 settlements.
11. Dividing 843 by 17 gives approximately 50 houses per settlement. But settlement 17 only has 150 houses and hence an allocation of 50 houses would equate to an increase of 50%. Again hardly the addition of a small site.
12. An alternative approach would be to divide the total number of houses in Purbeck, 21997, by 933. This gives approximately 23.57.
13. Thus if each settlement is given 1 additional house for every 23.6 houses in the settlement the smallest settlement East Holme with about 38 houses would receive between 1 and 2 houses and the largest, Swanage would receive about 240.
14. My table of a small site allocation to every settlement based upon the principle of 1 house for every 23.6 houses already in the settlement is shown below.

Small Sites						
Allocation to every settlement						
1 house for every 24 in the settlement						
M N H - 4 June 2019						
	In AONB =	Settlement	Sm Sites	Housing		
	In Green Belt =	order	Total	allocation		
	Limited by Green belt =	1=largest	933	%		
		Houses	(tot/23.6)	increase		
Swanage	1	5759	244	4%		
Upton	2	3429	145	4%		90
Wareham Town (np*)	3	2728	116	4%		300
Wool	4	2159	92	4%		470
Lytchett Matravers (NP)	5	1494	63	4%		150
N. Wareham St Martin	6	1159	49	4%		
Bere Regis (np*)	7	841	36	4%		105
Corfe Castle	8	710	30	4%		
Arne (np*)	9	630	27	4%		
Langton Matravers	10	479	20	4%		
West Lulworth	11	383	16	4%		
Worth Matravers	12	370	16	4%		
Winfrith Newburgh	13	325	14	4%		
Studland	14	258	11	4%		
Aff + Turners Puddle	15	220	9	4%		
East Stoke	16	177	8	4%		
Church Knowle	17	150	6	4%		
East Morden/Morden	18	88	4	4%		
East Lulworth	19	87	4	4%		
Bloxworth	20	84	4	4%		
Chaldon Herring	21	83	4	4%		
Moreton Station	22	83	4	4%		
Kimmeridge	23	80	3	4%		
Moreton village	24	76	3	4%		
Steeple	25	54	2	4%		
Coombe Keynes	26	41	2	4%		
East Holme	27	38	2	4%		
Moreton Pit (% ass 83 ho)	28	12				490
Small sites - 933 houses						
Moreton		159	933			
Crossways		1100				
Totals		21997				1605

15. In the table above the 4% increase for settlements 8 Corfe Castle to 27 East Holme might be acceptable, and they only amount to a total of 187 houses. However, the 4% total starts to look large for the larger settlements and probably unacceptable.

16. What this discussion has definitely highlighted is that 933 houses is too large a number for Purbeck to absorb as small sites and windfall on a free running basis, ie a hope that settlements will apply to build houses on sites within or adjoining their settlements.

17. Ten percent (NPPF page 19, paragraph 68 a) of the Policy H1 Local Housing Requirement of 2,688 houses is 270 houses. If the 270 houses were left unallocated to cater for small sites, the remaining 663 houses (933-270) would need to be allocated.

Inspector's Matters, Issues and Questions (MIQs)

Matter E: Housing

Issue 2: Housing Land Supply (Policy H2)

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Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Q6

Q6. How has flexibility been provided in terms of the potential supply of housing land?

Answer to question 6

2. There does not appear to be any flexibility.
3. With the AONB treated as off-limits for any housing allocations and a great reluctance to build on the Green Belt, only 7 settlements remain. Five of these are quite small, any development in Moreton would probably be directly opposite Station Road quarry, Bere Regis has used its Neighbourhood Plan housing total, leaving Wool.

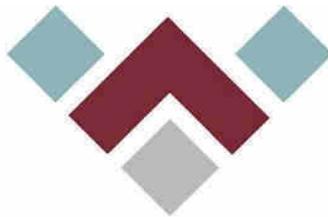
PURBECK LOCAL PLAN 2018 - 2034

EXAMINATION IN PUBLIC

RESPONSE TO MATTER E: HOUSING

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 E: Housing
- Issue 2: Housing Land Supply (Policy H2). Questions: 1 to 8.
 - Issue 3: 5 Year Housing Land Supply. Question 1.
 - Issue 4: Other housing policies. Question 1 to 4 and 7.

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

2.0 INSPECTOR'S MATTER E: HOUSING

Issue 2: Housing Land Supply (Policy H2)

Q1. Is the distribution of housing as set out in policy H2 (The housing land supply) consistent with the overall spatial strategy?

2.1 Welbeck accepts the policy H2 is consistent with policy V1: Spatial strategy for sustainable communities, but is concerned that the former is actually a repetition of the latter. As explained in response to the Inspector's Matter D; policy V1 muddles *spatial strategy* with *allocations* and goes straight to the numbers, bypassing the usual analysis of the spatial advantages of particular locations.

2.2 There is no underlying spatial strategy that determines the distribution of housing given in policy H2, nor is it apparent from the published evidence why the number of dwellings promoted at each settlement location conforms to a spatial strategy. There is no explanation as to why it is necessary to include a windfall figure within the figure for Wareham alone and not for other settlements. Also, for reasons expressed in our comments on Policy V1, at Matter D, Welbeck considers that it is not appropriate or practically possible for the required strategic housing supply to be abrogated to the Neighbourhood Plans.

Q2. 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?

2.3 In order to deliver the necessary housing mix across the plan area the council will need to seek to allocate a range of site types (greenfield, brownfield, settlement centre and edge etc.) and sizes (a range of capacities for homes). Welbeck foresees challenges to the council's approach: First; in that the council relies heavily upon windfalls and small sites, where the housing mix might not be reflective of what is required. Indeed, policy H9 has a threshold of site delivering in excess of 20 units and if a significant amount of the supply is to come from sites smaller than that, then the ability to manage the housing mix will be severely hampered. Second; devolving strategic scale site allocation to NP is already resulting in a reliance on potentially undeliverable or unviable brownfield allocations where again the housing mix will be at risk, and this is accepted in policy H9 where potential economic viability constraints are cited.

Q3. Are the Wareham and Bere Regis Neighbourhood Plans capable of making the allocations relied upon by policy V1 and H2 of the Local Plan?

2.4 Neighbourhood Plans (NP) are capable of making housing site allocations if the parent local plan provides a clear direction for them to do so and the allocation itself is non-strategic (strategic policy should be in the Local Plan). In the case of Wareham, in particular, the revised NPPF is clear – at paragraph 136 – that NP can now proposed detailed changes to Green Belt boundaries, so long as the exceptional circumstances are outlined in the Local Plan. This does, however, require the NP to follow the Local Plan in its preparation.

2.5 The approach taken in both policies V1 and H2 is not consistent with national policy. It does not respect the order and primacy of elements of the development plan and the Local Plan should set the housing requirement for the NP not *vice versa*. The NPPF is clear at paragraph 65 that:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”

- 2.6 Furthermore, given the strategic nature of the scale of development at Wareham and its importance to the overall delivery of the plan strategy there is significant risk in devolving this responsibility to a plan that does not have to meet the test of soundness. Welbeck’s concerns in this respect appear to be borne out in considering the Wareham NP. The proposed NP is unlikely to deliver sufficient sites to provide for 300 new homes. Proposed site allocations include employment sites in current active use and a reliance on the chance of a significant amount (on third of the total requirement) of windfall development.
- 2.7 It is clear that for Purbeck to be able to achieve and deliver its vision and requirements it must give stronger direction to subsequent NP. This direction should include a clear target for housing site *allocation*, and potentially given the strategic importance of the towns in the area, at least some of that target should be included as allocated development sites in the Local Plan – additional allocations could be considered through each NP.
- 2.8 A strategic policy for Wareham should be included in the plan and three site allocations should also be included that will demonstrate the overall deliverability of Wareham’s element of the plan target (of 10% of the 2,688 total):

Proposed Policy H7A – North Wareham: Land North of Carey Road

Land as shown on the policies map will help to meet the District’s housing needs by providing up to 60 new homes on Land to the North of Carey Road. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. *Ensure that the site is accessible to all traffic from the Carey Road and from Westminster Road.*
- b. *Provide a suitable SANG commensurate with the scale of this allocation near or adjacent to the land.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

Proposed Policy H7B – North Wareham: Land North of Bere Road

Land as shown on the policies map will help to meet the District's housing needs by providing up to 95 new homes on Land to the north of Bere Road. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. Ensure that the site is accessible to all traffic from Bere Road.*
- b. Provide a suitable SANG commensurate with the scale of this allocation near or adjacent to the land.*
- c. Ensure no direct pedestrian access link to the public footpath leading to Wareham Forest.*
- d. Provide a suitable alternative allotment facility within reasonable walking distance.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

Proposed Policy H7C – Sandford: Land to the South of Sandford

Land as shown on the policies map will help to meet the District's housing needs by providing up to 40 new homes on Land to the South of Sandford. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. Provide a suitable SANG, if required commensurate with the scale of this allocation, near or adjacent to the land.*
- b. Provide a replacement public playing field facility.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

- 2.9 Welbeck is also concerned at the level of windfall that is included in the Wareham requirement. It is accepted that NP can include windfall in their supply of new homes to meet their requirement consistent with PPG at ID: 41-097-20190509:

“In order for a neighbourhood plan to meet the criteria set in paragraph 14b of the Framework, the ‘policies and allocations’ in the plan should meet the identified housing requirement in full, whether it is derived from the housing figure for the neighbourhood area set out in the relevant strategic policies, an indicative figure provided by the local planning authority, or where it has exceptionally been determined by the neighbourhood planning body. For example, a neighbourhood housing requirement of 50 units could be met through 2 sites allocated for 20 housing units each and a policy for a windfall

allowance of 10 units. However, a policy on a windfall allowance alone would not be sufficient.”

- 2.10 However, Welbeck submit that it is not positive planning and neither does it provide certainty to developers or the community to simply leave to chance when and where a third of the required development will occur. This concern is directly linked to the Inspector’s question 4, to which Welbeck respond hereunder.

Q4. 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)?

- 2.11 Welbeck respectfully submit that this question should include consideration of the proposed windfall figures at Wareham. The total cumulative windfall figure of 933 + 100 at Wareham is 1033 dwellings. This equates to 38% of the total requirement of the plan. Above, Welbeck raises a concern that leaving a third of the plan strategy to chance cannot be considered to be a positively prepared plan, so for that element of chance to be raised to nearly two fifths provides even less certainty about the where and the when of development, let alone the appropriate provision of infrastructure in a timely manner.
- 2.12 Notwithstanding this very serious concern about the lack of positivity in the approach to housing supply in the plan, there is a significant disparity or gap in the evidence to support the number of 933 (or 1033) windfalls across the plan period.
- 2.13 The NPPF explains at paragraph 70 that if a council elects to include a windfall allowance in its housing supply there should be “*compelling evidence that they will provide a reliable source of supply*” and that “*any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*”
- 2.14 The evidence submitted by Purbeck is contained within the *Housing Background Paper*. This evidence which begins at paragraph 100 of that document suggests that historic trends could indicate 74 dwellings per year, or a more conservative 49 dwellings per year given more recent performance. The high end of this trend would suggest 1184 dwellings across the plan period and the low end would be 784 – neither of which is 933, even the midpoint of the trend figures is 984 so the figure included in the plan is completely random compared to the submitted evidence.
- 2.15 Moreover, the submitted evidence fails to explain the locations of the windfall, so the arbitrary hiving away of the windfall element at Wareham cannot be accounted for in the evidence. It could be that all the windfall has occurred in Wareham, and in fact historic trends suggest it could be higher there, than elsewhere in the plan area. to understand the appropriate windfall figure a more sophisticated analysis of historic trends in terms of amount and location is required.

Q5. 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?

- 2.16 Welbeck's submission is in short, that the policy is not consistent with NPPF paragraph 68. The policy should include a more proactive approach to identifying sites. Strategies to include permission in principle or local development orders should be included in the policy. The councils approach set out in policy H8 speaks to the same concerns that Welbeck raise above regarding windfall: too much is left to chance. This does not demonstrate a positively prepared plan that demonstrates that its strategic requirements can be delivered. This is the antithesis of a plan led system.
- 2.17 If the policy included a proactive approach to identifying sites, alongside some flexibility towards appropriate 'edge of settlement' sites then it could be considered to be a sound policy. Additionally, however, it is not clear from the submitted evidence how the figure of 30 dwellings has been reached. It is not justified by reference to the published evidence base.
- 2.18 Moreover, the population of the settlement of Sandford is on a par with the scale of Wool, and in some ways superior in respect of its access to facilities, employment areas and transport links. Therefore referring to the evidence base, we would recommend that Sandford's potential to accommodate development at an appropriate scale is recognised. The 30 dwelling limit should be omitted from this policy and Sandford should be added to the settlements with specific allocations. We have proposed a new policy accordingly above in response to the Inspector's question 3.

Q6. How has flexibility been provided in terms of the potential supply of housing land?

- 2.19 Welbeck assumes that a key element to the plan's flexibility is the inclusion of a high level of windfall and the small sites policy H8. The lack of certainty and positivity in this approach is outlined above, and needs to be resolved for the plan to be considered deliverable and sound.
- 2.20 The plan does include a limited range of site allocations, and provides some direction for NP. Welbeck respectfully submits that this could be improved with additional allocations at Wareham as outlined above at question 3.

Q7. 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)?

- 2.21 Welbeck agrees that this would be a sensible and necessary inclusion in the plan. It is not expected that completions will form a significant part of the plan supply for a period only a year old, however, Welbeck has found it difficult to understand how the council has reached all of its conclusions. For example, it is not clear how the figure of 1,700 new homes residual has been calculated from the evidence base (The evidence document, Housing Background Paper, does not contain an obvious analysis leading to this figure). Welbeck assume that this is linked to local commitments.
- 2.22 This figure of 1,700 is the starting point for the spatial strategy. An additional modification to include a simple table at or around paragraph 40 of the plan would usefully clarify the calculations, as described in the Inspector's question 7.

Q8. (a) Does the housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period?

(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?

- 2.23 Welbeck accepts that the housing trajectory in the plan is reasonable, except for two key elements. First; the reliance on windfall and small sites is too unpredictable and take too much of the overall strategy. These concerns are detailed earlier in this submission. Second; there is significant concern about the availability and deliverability of site at Wareham proposed for allocation in the Neighbourhood Plan.
- 2.24 As Welbeck has detailed through its submissions to the Inspector's Matter G, the Westminster Road Industrial Estate is not available for development, is in active use and should not be lost from employment in any case. The devolution of a significant amount of the strategic supply of homes to NP risks the plan trajectory if the selected sites are not subject to the same level of scrutiny as those that are proposed through the Local Plan.
- 2.25 The proposed modification is to update the trajectory given the most up-to-date data. Welbeck submit that it is very difficult to meaningfully respond to this change until it is shown what this update looks like and its implications can be understood. This is a matter that will need to be debated through the examination hearings, or at least submissions be allowed once the council has actually published the suggested updates.

Issue 3: 5 Year Housing Land Supply

Q1. 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 where it is described as 'confirming' the 5-year housing land supply.

... 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?

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

(c) Is there a 5-year supply?

(d) How has this been calculated?

- 2.26 Welbeck notes the publication of the latest (May 2019) five year housing land supply statement, where the council records a supply of 1,403 dwellings against a need for 1,029 and thus a 6.8 years supply. This statement includes a range of emails from site promoters and developers confirming their site trajectories and therefore Welbeck see no reason to challenge the supply at this time. Welbeck does, however,

challenge the housing requirement as set out in response to the Inspector’s Matter B. Welbeck’s revised five year land supply calculation is set out hereunder:

a) Local Housing Need 2019-2024 (180 x 5)	900 dwellings
b) Completions 2018-2019	73 dwellings
c) Shortfall from 2018-2019 (180 – b)	107 dwellings
d) Total (a + c)	1007 dwellings
e) Plus 10% buffer (d + 101)	1,108 dwellings
f) Requirement per annum (e / 5)	222 dwellings

Total housing supply required (2019-2024)	1,108 dwellings
Annual housing supply required (2019-2024)	222 dwellings

The council’s assessment has identified a supply of 1,403 dwellings which are anticipated to be delivered in the period 1 April 2019 to 31 March 2024.

$$1,403 / 1,108 \times 5 = 6.33$$

Total five-year housing supply (2019-2024)	1,403 dwellings
Total supply in years	6.3 years

2.27 The above calculations suggest that the plan does provide for a five year land supply – if not quite as healthy as the 6.8 years that the council contend in their latest statement. But as referenced above, Welbeck sees limited concern in the short term deliverability of the local plan strategy, it is the medium and longer term; especially at Wareham where significant risk lies.

Issue 4: Other housing policies (Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15).

Q1. (a) Are the specific requirements of policy H3 (New housing development requirements) justified, effective, likely to be viable and consistent with national policy?

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

(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?

2.28 Policy H3 applies a list of criteria with which allocated sites need to comply. The wording is unclear as to whether this list applies only to sites allocated in policies H4 – H8 or whether it is intended to apply to all sites that may be allocated in other, e.g. Neighbourhood Plans. In particular, it seems clear that the criteria would not apply to sites that might otherwise have been allocated but which may be acceptable development either through windfall or through a Part 2 Brownfield Land Register provision.

2.29 In addition, Welbeck objects to the lack of a policy for the allocation of land at North Wareham which are important strategic land allocations necessary for the effective delivery of this Local Plan. Welbeck has submitted above suggested additional policies to ensure the deliverability of the plan.

2.30 Welbeck has no comment to make regarding the proposed modification.

Q2. (a) What is the relationship between policy H8 (Small sites next to existing settlements) and the principle of policy H12 (Rural exception sites)?

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

2.31 Welbeck is concerned that there is significant cross over between policies H8 and H12. There is a risk that H8 could render potential exception sites as unavailable because the opportunity for market housing led development is too great. This is another example of the lack of certainty in the delivery of the overall plan strategy.

Q3. (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?

(b) Would this be consistent with national policy?

2.32 Welbeck has significant concerns that this policy is unclear and seeks clarification from the council on this matter. There could be conflict between this policy and non-strategic policies proposed in Neighbourhood Plans (NP).

2.33 Without confirmation of the policy intentions it is difficult to assess whether it would be consistent with national policy. If it transpires that this policy is intended to cover *all* development applications then it could well be superseded by NP policies as they are 'made.' This would be consistent with national policy if H8 is declared a 'non-strategic' policy, however, if it remains 'strategic' as with all the other policies of the Local Plan then it would remove the opportunity for a range of detailed consideration to be made at the NP level which would not be fully consistent with NPPF paragraphs 20 and 21. The provisions of H8 risk going further than the 'overall strategy for the pattern, scale and quality of development.'

Q4. (a) Are the specific requirements of policy H8 justified?

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

(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?

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

2.34 Welbeck is concerned that it is not clear from the submitted evidence how the figure of 30 dwellings has been reached. It is not justified by reference to the published evidence base.

2.35 Understanding the cumulative impact of such a 'flexible' policy will require burdensome and continued monitoring. A pro-active site identification policy will reduce the burden of a rolling cumulative impact assessment if impacts can be understood at the earliest possible stage of the plan making process.

- 2.36 Welbeck considers that the modification to remove 'edge of settlement' site at location in the Green Belt is necessary to make the plan sound. However, Welbeck would point out that there are site allocation opportunities at settlements in the Green Belt, and the council has identified exceptional circumstances to do this, therefore there is no need to have a criteria based policy such as H8 when a more positive and proactive schedule of site allocations or strategic directions to potential NP groups could be achieved.
- 2.37 Welbeck has been consistently clear through its submissions to the Inspector's Matters that the overall strategy for the plan relies too heavily on small site and windfalls. Whilst an element of each is necessary for a balanced plan, for policy H8 to be consistent with NPPF paragraph 16 it should include site allocations to demonstrate a positively prepared plan that can be shown to deliver sustainable development.

Q7. 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?

- 2.38 Welbeck recognises the need to differentiate between greenfield and brownfield sites for the proportion of affordable housing, however where a large proportion of a limited proposed housing supply is obtained from brownfield land sources and small sites, and windfall, there will be a consequence. This consequence is an inevitable overall constraint on the amount of affordable housing that can be delivered.
- 2.39 This does have a real rather than theoretical effect in Wareham in particular. The significant reliance on brownfield redevelopment risks the viable delivery of affordable homes through the submitted NP. This risk is exacerbated by the fact that there is no guarantee that the Westminster Road Industrial Estate is in fact available for development even if affordable housing delivery is viable. Welbeck has also raised concerns with the Wareham Town Council and the NP examiner about the extent to which the stated affordable housing requirement is not being met.

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Part I Matter E. Housing

1 Issue 4. Other Housing Policies

1.1 Q. 4

1.1.0.1 Please refer to my comments under Matter A, Issue 5, Qs 1 to 3 and Matter H, Issue 3, Q 3 for the problems of cumulative effects and mitigation of policy **H8**.

**Purbeck Local Plan Examination
Hearing Statement on behalf of Wyatt Homes
(Respondent: 1190024)**

Matter E – Housing

June 2019



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Client

Wyatt Homes

Our reference

WYAW3012, WYAW3013 and WYAW3014

June 2019

1. Introduction

- 1.1 This statement is submitted on behalf of Wyatt Homes (Respondent ref: 1190024) to the Purbeck Local Plan Examination. It responds to the Issues and Questions outlined under '*Matter E – Housing*'.
- 1.2 This statement follows our representations submitted in December 2018 in response to the consultation held on the Purbeck Local Plan 2018 - 2034 Pre-Submission Draft (Ref SD01a). It should be noted that separate representations were made on behalf of Wyatt Homes in relation to a number of sites within what was then Purbeck District. The full list of representations and appendices submitted in December 2018 on behalf of respondent 1190024 is as follows:
- Representations in relation to Land East of Wareham Road, Lytchett Matravers:
 - Appendix 1: Delivery Framework Document for Land East of Wareham Road
 - Representations in relation to Blaneys Corner and Sunnyside Farm, Lytchett Matravers:
 - Appendix 1: Delivery Framework Document for Blaneys Corner and Sunnyside Farm
 - Appendix 2: Blaneys Corner – Landscape and Green Belt Study by HDA
 - Appendix 3: Sunnyside Farm – Landscape and Green Belt Study by HDA
 - Representations in relation to Land at Policemans Lane and Frenches Farm, Upton:
 - Appendix 1: Delivery Framework Document for Land at Policemans Lane
 - Appendix 2: SHLAA Consultation Response in relation to Frenches Farm, Upton
- 1.3 This statement is prepared in support of all of the above representations. However, we have not considered it necessary to address every Issue or question set by the Inspector. Therefore, the responses provided in Section 2 of this Statement cover only those areas where Wyatt Homes consider a response is required to support or elaborate on their original representations.

2. Response to Issues and Questions – Matter E

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?

- 2.1 The housing allocations identified at Lytchett Matravers (Policy H6) and Upton (Policy H7) are considered to be soundly based and have resulted from an appropriate and robust process of site selection undertaken by the Council.
- 2.2 Notwithstanding our support for the overall soundness of the allocations at Lytchett Matravers, we disagree with the Council over the extent of the site known as ‘Blaneys Corner’. Wyatt Homes consider that a larger site, delivering a total of 60 dwellings, as promoted within our *Delivery Framework Document for Blaneys Corner and Sunnyside Farm*¹ represents a better basis for a site allocation, with significantly improved planning and other benefits, as we set out in detail within our previous representation.²
- 2.3 In relation to Upton, the Council has opted to omit an adjacent parcel of land to the east of Watery Lane that we consider should be included within the site allocation at Policemans Lane and which would be able to deliver a combined total of around 105 dwellings in addition to increased open space. This larger site has been promoted by Wyatt Homes within our previous representations³ and within the *Delivery Framework Document for Land at Policemans Lane*.⁴

Question 4 - Are the assumptions regarding capacity of each of the allocations justified and based on available evidence?

- 2.4 Notwithstanding our disagreement with the Council on the extent of allocations sites at Blaneys Corner, Lytchett Matravers and Policemans Lane, Upton, we agree that the capacity identified for each site within Policies H6 and H7 is appropriate. These capacities originated from work undertaken by Wyatt Homes and presented within the Delivery Framework documents that were appended to our representations and also informally shared with Council Officers.
- 2.5 However, the way in which the site capacities are expressed in Policies H6 and H7 as ‘maximums’ with the use of “up to xx new homes” is not supported. Indeed, seeking to apply the capacity figures as maximums is considered to make the policies inflexible and unsound as the approach is not justified, since it is not based on the available evidence. This is because the work undertaken by Wyatt Homes, including indicative

¹ See Appendix 1 within our previous representations on Blaneys Corner and Sunnyside Farm.

² Representation ID ref: PLPP481.

³ Representation ID ref: PLPP493.

⁴ See Appendix 1 within our previous representations on Land at Policemans Lane.

layouts for each of the sites was not intended to provide a definitive capacity limit and was designed to provide a clear indication of the approximate level of new homes that could be achieved in each case.

- 2.6 In order to resolve this issue and to enable the site capacities identified within Policy H6 and H7 to be sound, we recommend that the maximum capacities be removed by changing the phrasing to “around xx new homes” in each case.

Question 5 - Is there robust evidence that the development of the allocations is viable and deliverable?

2.7 Wyatt Homes have worked closely with the Council to assist in demonstrating that the sites being promoted at Lytchett Matravers and Upton are viable and deliverable. This has included a number of engagement meetings and regular communication with Council Officers over the past two years. More recently, we have jointly completed Memorandums of Understanding for both Lytchett Matravers and Upton with the Council.

2.8 Wyatt Homes controls all of the land required to deliver the site allocations identified within Policies H6 and H7, including the SANG mitigation land in each case. We confirm that all sites are currently available for development. Further, the preparation of full planning applications for each of the sites is now underway with teams assembled to undertake the detailed site investigation work that will support the planning applications. This work will continue over the coming months and the intention is for planning applications to be submitted to the Council shortly after the local plan is adopted.

Question 6(a) - What are the assumptions about the scale and timing of supply and the rates of delivery?

2.9 Wyatt Homes has developed an initial programme for bringing each of the site allocations forward. As referred to above, the preparation of full planning applications is now underway with the expectation that these will be submitted in relation to all of the sites shortly following the adoption of the local plan.

2.10 Informed by engagement with Council Officers and based on the Council’s preferred extent of the site allocations⁵ the delivery of the 240 new homes identified within Policies H6 and H7 would be as indicated within the table below.

	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Upton/Lytchett Matravers	0	0	15	85	85	55

⁵ As opposed to the larger allocation sites at Blaneys Corner, Lytchett Matravers and Policemans Lane, Upton as promoted by Wyatt Homes.

Question 6 (b) - Are the assumptions realistic?

Question 6 (c) - What evidence is there to support the assumptions?

2.11 We consider that the assumptions made are realistic based on the level of technical site assessment work already undertaken and on our current understanding of the sites. This view is also supported by the fact that work to prepare full planning applications has now commenced in earnest. Whilst it is true that unforeseen events which are beyond Wyatt Homes control (such as a delay to the adoption of the local plan) could have adverse consequences for the proposed delivery programme, we remain confident that the overall programme is realistic and can be achieved.

Question 7 (a) - Are the policy criteria set out in the relevant policies justified and effective?

2.12 In relation to Policy H7 (Upton) we consider that the criteria are justified and effective. Criterion a. seeks to address a site-specific issue related to traffic noise and criterion b. seeks the provision of financial contributions for local health and education infrastructure. These criteria are evidence based and are capable of operating in a flexible way, aided by the final paragraph of Policy H7 which sets out the Council's approach to instances where financial viability considerations threaten the achievement of the policy objectives.

2.13 In relation to Policy H6 (Lytchett Matravers) it is considered that criterion a. is neither justified nor effective as currently drafted. Whilst we are content that there is a valid case for development at Lytchett Matravers to contribute to the improvement of accessibility between the village and the nearby village of Lytchett Minster, the way in which criterion a. is phrased is inflexible and may prove to be undeliverable, since improving or forming the defined walking and cycling routes referred to may necessitate third party land, beyond the control of Wyatt Homes.

2.14 In order to remedy the above issue and to assist the soundness of the Policy H6 criterion a. we suggest the following revisions:

"a. ~~improve~~ facilitate accessibility between Lytchett Matravers and Lytchett Minster by ~~forming or improving~~ contributing to the improvement of defined walking and cycling routes between the villages; and"

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?

2.15 Yes. In relation to Policy H6, Wyatt Homes has proposed a SANG at the north-eastern edge of the village. This area measures 7.3 hectares which is more than sufficient in scale to meet the mitigation requirements of all three proposed sites within Lytchett Matravers, including the larger proposed development at Blaneys Corner, were this to be allocated. The proposed SANG land is owned by Wyatt Homes which will facilitate bringing the SANG forward at the point it is required.

2.16 In relation to Policy H7, there is an existing SANG that was provided by Wyatt Homes to mitigate the recreation impact of their recent Frenches Green development. This SANG is adjacent to the proposed site allocation and measures 4.8 hectares. This is of a sufficient size to mitigate the recreational disturbance impact of the proposed allocation within the local plan (90 dwellings). It is also sufficient to mitigate the

recreational disturbance impact of the larger development, as promoted by Wyatt Homes (105 dwellings).

- 2.17 Recent engagement with Natural England has indicated that an additional area may need to be removed from agriculture in order to provide for 'nitrogen neutrality' in relation to the proposed allocation at Policemans Lane. Wyatt Homes controls land to the east of the existing SANG, measuring some 2.37 hectares, which would be suitable to offset at least a portion of the nitrogen deposition impacts of the Upton site allocation, in accordance with the adopted Nitrogen Reduction in Poole Harbour SPD. This area could be made available as an extension to the Upton SANG in the event that evidence confirmed that this would be required to mitigate the recreational disturbance impact of further development within Upton.
- 2.18 Wyatt Homes, the Council and Natural England have now prepared Memorandums of Understanding (MoUs) for the Local Plan Examination in relation to both Lytchett Matravers and Upton. These documents confirm that the proposals for SANG land at both settlements are sufficient to mitigate the recreational disturbance impact of the proposed allocations (including the larger sites promoted by Wyatt Homes).

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?

- 2.19 We consider that there is an inconsistency here and we have drawn attention to this previously within our representations. We support the use of "at least..." within Policy H1 as this is 'positive planning' and aligns with the overall objectives of national planning policy to boost housing delivery and economic development more generally.
- 2.20 As we have explained in our answer to Question 4 above, we do not consider that the phrasing of Policies H6 and H7 is justified in its use of "up to xx new homes". This is because we have seen no evidence that the capacity levels identified for the proposed allocations sites within these policies represent absolute maximum capacities in each case. The appropriate level of development for the sites within Upton and Lytchett Matravers has yet to be determined and it may be appropriate and beneficial for slightly more than the identified numbers to be delivered, in order to achieve the most sustainable and deliverable scheme in each case.
- 2.21 It is our view that the level of homes to be achieved from each of the identified site allocations should be phrased in a more positive way such as "around xx new homes" which would allow for a slightly higher number to be achieved if this could be supported by evidence at the planning applications stage. It is acknowledged that this change could result in slightly fewer than the identified capacity number being delivered on some allocations sites. However, we believe that overall, across the various allocations within the local plan, that would balance out more readily to achieve the desired number of dwellings from Policy H1.

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?

- 2.22 There are two elements within policies H6 and H7 that we consider fail to meet the tests set by paragraph 16 of the NPPF, each of which we have covered in detail within our previous representations and within our answer to questions above. In summary these elements are:
- (a) The use of the term “*up to xx new homes*” within both Policies H6 and H7. Please see our answers to Questions 4 and 9 above; and
 - (b) The phrasing of criterion a. in Policy H6. Please see our answer to Question 7a. above.

Issue 2: Housing Land Supply (Policy H2)

Question 6 - How has flexibility been provided in terms of the potential supply of housing land?

- 2.23 Whilst we broadly support the proposed use of Policy H8 (Small sites next to existing settlements) as a flexible approach, we consider that this policy alone is unlikely to provide sufficient flexibility to provide reasonable certainty that the overall housing target (2,688, or 168 per year) can be achieved. We note that the local plan only proposes to meet the minimum ‘local housing need’ figure, as set out within Policy H1, with no planned headroom above this requirement.
- 2.24 It is important to note, when considering Policy H2, that the level of housing delivery identified for the strategic site allocations is currently phrased as maximums (using “*up to...*”) within Policies H4, H5, H6 and H7. In addition, the level of delivery anticipated from both small sites, under Policy H8 and also from windfalls within existing settlements, is already factored into the planned housing supply in Policy H2. Therefore, we believe that there is a risk that the local plan policies, as currently drafted, may not achieve the required level of housing delivery.
- 2.25 In order to provide for additional flexibility, and therefore greater certainty of achieving the required level of housing delivery, we recommend that the local plan is modified to provide additional housing land on allocated strategic sites. To this end, we would draw your attention to the potential for the site allocations at Blaneys Corner, Lytchett Matravers, and Policemans Lane, Upton to be expanded to provide for an additional 35 and 15 dwellings respectively.
- 2.26 Whilst these additional 50 dwellings would not be sufficient alone to provide for the additional necessary flexibility in housing supply, they will make a significant contribution and are located on sites that are available now and are able to come forward early within the plan period. These site allocations have already been tested by the Council and found to be sustainable and suitable for development, subject to appropriate mitigation as required by planning policies.

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

- 2.27 We agree that the proposed change indicated in MM5 of SD14 assists to make criterion g. of Policy H3 sound. The reason provided by the Council is justified and the approach set out within MM5 is supported.
- 2.28 However, we consider that the approach to achieving superfast broadband (also included within criterion g.) should have been treated in the same way and only required where this is feasible and viable. In a rural area such as Purbeck, not all sites may benefit from the facility to connect to superfast broadband.

Question 1(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?

- 2.29 There are a number of instances within Policy H3 where the wording of the criteria does not meet the tests set out within paragraph 16 of the NPPF. We summarise these below along with our recommended approach to resolving the issue.
- 2.30 Criterion a. simply signposts Policy E12, which represents unnecessary duplication. The policy header already states that development proposals must comply with all relevant policies in the Purbeck Local Plan. This criterion should be deleted.
- 2.31 Criterion b. also signposts other policies and thus represents unnecessary duplication. It should be deleted.
- 2.32 Criterion f. seeks the provision of green open space consistent with the '*Fields in Trust Guidance for Outdoor Sport and Play Beyond the Six Acre Standard England*'. Whilst that guidance provides basic quantity and quality standards, this simple signposting approach does not provide clarity for decision makers on how open space should be provided on sites which are too small to generate the need for a whole sports pitch or play facility. Additional guidance is required for this criterion to be effective. This should cover whether a financial contribution would be sought in lieu of on-site provision or whether other forms of open space (such as informal amenity space) should be provided in place of formal sports or play facilities on smaller sites.
- 2.33 Criterion g. - Please see our answer to Question 1b above.
- 2.34 Criteria i. refers to including survey information that identifies important trees and providing details for their retention and protection whilst construction work is taking place. We consider that it is not appropriate to require that all important trees are retained, as this may not be practicable or appropriate to do so in order to deliver the development. To that end, we suggest the following revised wording for criterion i:

"include survey information that identifies important trees, and provide details for their retention and protection, where practicable and appropriate to do so, whilst construction work is taking place."

- 2.35 We also consider that the Glossary of the local plan should clarify what trees are considered by the local plan to be 'important'. For example, does this relate to trees that are classed 'A' under the *British Standard for Trees in relation to design, demolition and construction* (BS5837: 2012).
- 2.36 Criterion j. also signposts another policy requirement and thus represents unnecessary duplication. It should be deleted.

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?

- 2.37 The approach taken in Policy H9 to housing size mix is a flexible one which is broadly supported. Whilst the recommended mix of homes set out within the Strategic Housing Market Assessment (SHMA) reflects only a point in time, the Council have not sought to import the current SHMA recommended mix directly into the policy but have referenced the SHMA as a document, allowing for the fact that this may well be updated in coming years, thus enabling the approach to remain up-to-date.

Question 5(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?

Question 5(c) - Is the wording of policy H9 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?

- 2.38 We have addressed Questions 5(b) and 5(c) together below as we consider that the issues overlap.
- 2.39 In relation to self-build plots, we consider that the requirement to provide 5% of market homes as self-build plots on sites over 20 units is not justified and is contrary to national policy. We also consider that this is an inflexible approach, which could adversely impact on the character of development and on the financial viability of the local plan's key strategic site allocations.
- 2.40 The Self-build and Custom Housebuilding Act 2015 and all subsequent national planning policy and guidance clearly refer to both self-build and custom housebuilding. This is important as custom housing building is distinct from self-building, but is equally supported by national policy and legislation. Therefore, we do not consider that Policy H9, as currently drafted, complies with national policy in seeking to promote only 'self-build' homes.
- 2.41 The proposed approach is inflexible in that it would apply to all sites being delivered over the stated threshold, irrespective of whether these are suitable developments for the provision of self-build plots. It is not hard to think of various scenarios, for example, flatted schemes or many brownfield developments where the provision of self-build plots on site would almost certainly be inappropriate and unpractical. Even on greenfield sites, the provision self-build plots can have significant implications for the character of the scheme and how it is laid out.
- 2.42 We also consider that both the 5% target and the 20-unit threshold are not justified and they appear arbitrary and do not appear to be based on appropriate evidence to support these figures. On review of the Viability Study Update 2018 (SD35) it is notable

that there is limited evidence to support the assumption made that custom-build and self-build plots will have a '*neutral impact*' in viability terms. Indeed, the authors of SD35 profess to have limited experience in this form of development to date.⁶ Further, no custom-build or self-build plots appear to have been built into the viability appraisals and instead, homes included are those proposed for market sale which does not reflect the specific financial implications of developer's delivery self-build plots.

- 2.43 In relation to the requirement for 10% single storey homes, we consider that this is also not justified as it is not evidence-based, and is not in accordance with paragraph 122 of the NPPF regarding the efficient use of land. Notwithstanding the overall evidence that the demographic profile of the Purbeck area includes a higher than average level of older people and will continue to age over the coming period, the 10% requirement in Policy H9 is arbitrary as it does not appear to be based on any clear understanding of the level of need for single story homes. We acknowledge that the Housing Background Paper (SD19)⁷ refers to the need for this form of housing provision, but it sheds little light on the reasons why the specific target within Policy H9 has been set.
- 2.44 We also consider that this requirement is not effective as it is unclear how planning proposals would need to comply. In particular, it is unclear as to the precise meaning of 'single story homes'. Whilst SD35 appears to take these to comprise 'bungalows', could they not also include low rise flats, assuming these were accessible to less mobile older people, for example by incorporating a lift? These two different approaches are likely to have very different implications for the character of the scheme and for the overall financial viability and is an important point to clarify.
- 2.45 Policy H9 additionally requires the identified housing allocations to provide 20% of both the market and affordable homes as specialist purpose built accommodation for the elderly. Again, this requirement level appears to be arbitrary and not based on any clear evidence to support that level of provision. Further, there is little clarity as to how this provision should be achieved, particularly for smaller site allocations which are unlikely to be suitable for sheltered housing or extra care schemes. We acknowledge the reference to the potential overlap between this requirement and that requiring 10% of market homes to be provided as 'single story homes'. However, given the lack of clarity over how that requirement could be achieved, the concerns regarding the potential impacts on scheme character and overall viability are amplified when the 20% requirement is considered.
- 2.46 In order to address the identified deficiencies in Policy H9, the Council should clarify how its approach is consistent with its evidence base and with national planning policy and guidance and indeed how it intends for the requirements to be complied with. However, in the absence of clear quantifiable evidence of need and of the viability impact of the proposed requirements within Policy H9, we consider that they should only be taken forward if the policy wording is amended to provide greater flexibility to developers. For example, the second paragraph of Policy H9 could be modified as follows:

⁶ SD35: Paragraph 3.2.28

⁷ SD19: Paragraph 120

"For sites delivering 20 or more units, development proposals will be ~~permitted~~ where encouraged to provide, as part of the proposed market homes:

- a. around 5% ~~are~~ offered for sale as self-build or custom-build plots. Such plots must be provided with a means of access and utility services to the boundaries of the plot.*
- b. around 10% ~~are~~ single storey homes (for example, bungalows or accessible flats suitable for the elderly)."*

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Purbeck Local Plan
Submission Draft Plan – January 2019

Statement on Matter E: Housing

By

**Savills on behalf of the Landowners of the
Wool allocation covered by Policy H5.**

Representation no. 1190693

June 2019



Matter E: Housing

Issue 1: Housing Allocations

Q1. (a) Soundly based?

The NPPF (February 2019) states in paragraph 35 that:

Plans are 'sound' if they are:

a) Positively prepared;

The Wool landowners accept that Dorset Council (DC) has followed due process in reaching the Examination Stage, particularly in respect of identifying its overall housing need figure for the Purbeck district. However, the advent of the new DC is a key background event to the Examination. The new council now has a wider remit and capability to resolve the unmet housing needs of all of its constituent districts.

b) Justified;

Whilst the Wool landowners acknowledge the allocation of 470 dwellings at Wool in Policy H5, based on the sites positive credentials mentioned in the MOU, they are concerned over the proposed distribution of housing in policies V1 and H2. They are particularly concerned on DC's over-reliance on unidentified small sites next to existing settlements (270 units) and windfall (663 units) a total of 933, 35% of its overall supply.

c) Effective;

470 homes are deliverable on the H5 allocation within the Plan period, as demonstrated in the trajectory in the MOU, which is backed up by a timeline demonstrating how developers can come on board and a planning application determined allowing for delivery early in 2021.

To rely on 35% of housing supply coming from unidentified small sites and windfall does not appear to be an effective way for DC to achieve delivery in a timely fashion over the Plan period.

Whilst para 68 of the NPPF acknowledges that *small and medium sites can make an important contribution to meeting the housing requirement ...* it also advises that *local planning authorities should:*

a) identify, through the development plan ..., land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; (Our underlining)

d) work with developers to encourage the sub-division of large sites where this could speed up the delivery of homes.

The Wool H5 allocation is a medium sized site which, as well as making an important contribution to meeting the housing requirement, could be built out relatively quickly. It is made up of four component parcels, and hence already has a degree of subdivision which would help phasing.

The Local Plan identifies numbers of dwellings the Council expects the Plan to deliver but it has not followed NPPF guidance in identifying small sites. Therefore, Policy H8 does not provide the required certainty regarding delivery of dwellings from these sites. This is not effective in terms of ensuring delivery through more certainty. In dealing with unidentified sites there are also Green Belt, AONB, SANG and other objections from Statutory Consultees to be considered.

d) Consistent with national policy – *enabling the delivery of sustainable development in accordance with the policies in this Framework.*

Para 8 of the 2019 NPPF states that:

Achieving sustainable development means that the planning system has three overarching objectives:

a) economic

b) social; and

c) environmental.

270 units are identified as being provided next to existing settlements in the Plan's housing land supply through the Small Sites policy. Policy H5 allocates Wool for 470 dwellings and the Wool landowners have indicated in para 56 of the MOU that 800 homes could be delivered at Wool.

When the sustainability credentials of developing a large known housing site adjacent to an existing sustainable settlement is compared to developing a series of unidentified small sites, the former is by far the better in terms of certainty of delivery.

In terms of the NPPF objectives:

a) Economic. Development of a larger site compared to a series of small sites allows for much better infrastructure planning and provision. Development of a larger site can provide greater levels of new infrastructure than small sites. A larger development can address such issues, whereas small sites would struggle. (This is of course dependent on viability and the Council's overall Section 106 requirements for larger sites.)

Wool is a second tier settlement within the Council's settlement hierarchy, with a main line train station and other services. (See MOU). Development of small sites is likely to take place at smaller less sustainable settlements. Timing of delivery at a larger site is easier to predict, whereas there is a lack of certainty in the delivery of a series of unidentified small sites. Innovation and improved productivity is also more likely in the development of a large site compared to smaller sites.

b) Social. 'a sufficient number and range of homes' mentioned in this objective is more easily provided on a large site rather than a series of smaller sites. Affordable housing delivery is known to be higher from larger sites. Larger sites also have better ability to deal with educational, community and health needs arising from the development.

c) Environmental. On larger sites, as well as the potential to deliver more environmentally innovative schemes, there is less overall impact of development, if it is concentrated in one location. Small sites have dispersed cumulative impacts potentially in more sensitive areas. Additionally, a larger site, like that at Wool, can avoid numerous incursions in AONB, unlike small sites adjoining existing settlements. A larger site can provide large areas of compensatory SANG, as well as a range of open space and play area provision.

Q1. (b) Identification process of the allocations robust?

As part of the Purbeck Consultation in January 2018, the Council consulted initially on options for 470, 650 or 800 homes in Wool, with zero small sites provision for the 800 option.

There was also consultation on options for 440, 500 or 600 homes at Redbridge Pit / Moreton Station.

There was public opposition to the delivery of housing primarily through larger allocations leading the Council to come up with a more dispersed strategy.

The Council also consulted on a new Small Sites policy. With 64% respondents agreeing with the inclusion of such a policy in the Local Plan, the Council followed the course set out in draft Policy H8. This chose not to identify specific small sites in the Plan, believing this would be more effective, which the landowners would dispute.

As a result, the Wool allocation was cut back to 470, with the inclusion of Policy 8, which identifies a target number of dwellings, but does not identify small sites, which brings the soundness of the overall Plan into question.

Q2. Robust evidence to support the inclusion of two 65 bed care homes in the Plan?

In Table 67 of the Eastern Dorset SHMA 2015 the Potential Need for Residential Care Housing is identified for 2013-33. The change in the institutional population aged 75+ is 131.

In the Plan Section 2 of draft Policy V1: Spatial Strategy states that:

Purbeck's ageing population will be catered for by the provision of two 65 bed care homes – one at Wool and one at Moreton

This amounts to a requirement of 130 beds.

As a result of this, the landowners have provided a care home in their illustrative Masterplan for the current Wool allocation for 65 beds.

Q3. Community hub at Wool (policy H5) justified?

As indicated in para 32 of the MOU with the Council, one approach to this policy could be to provide reasonable and appropriate contributions towards the existing Wool parish hall. The requirement for retail provision remains as per policy EE3. (See para 33 of the MOU)

Q4. Assumptions regarding capacity justified?

An illustrative Masterplan for upto 1000 homes was initially prepared in August 2016 (Reg 18 stage) and submitted to the Council. At the Reg 19 stage a revision confirmed how 470 dwellings and a care home can more than adequately be sited within the H5 allocation. (See Appendix)

Thus potential constraints to development have been considered from early outset of planning work, together with master planning, commencing with the Wool Vision Document. Subsequently, as confirmed in the MOU, matters such as transport, drainage, flood risk, the site not being within AONB or Green Belt, SANG provision, Ecology, Landscape, Archaeology, Scheduled Monuments and pipelines have all been taken into consideration in the latest layout.

Q5. Allocations viable and deliverable?

The allocation of the Wool site is the result of a thorough site selection process. The site is considered viable and deliverable, provided the policy requirements are appropriately balanced against the costs of bringing larger sites forward for development. In this regard, as indicated in our previous written representation, we feel a number of the viability inputs are set at levels, which combined inflate the site's ability to provide affordable housing at 40%. We consider a level at 30% to be more reflective of the overall scheme viability for the Wool allocation and that a more flexible affordable housing tenure mix should also be permitted. (See Appendix – Viability Matter report)

Q6. (a) Scale and timing of supply and the rates of delivery?

It is assumed in the MOU that the Wool site would start delivering dwellings in 2020/2021. Explanation is covered in paras 53- 55.

(b) Assumptions realistic?

In the MOU with the Council it is stated in Para 54:

The parties agree that the H5 Wool allocation is capable of delivery of dwellings within the Plan period and that the level of homes proposed for allocation in the Plan (470 homes) would have the following trajectory. Both parties agree with the following trajectory of housing as a minimum.

An agreed trajectory follows with commencement of 20 on 2020/2021 with 65 each year until 2026/2027 finishing with 60 in 2027/2028.

The delivery figures assume two sales outlets.

(c) Evidence to support assumptions?

Delivery of 65 dwellings per year is derived from delivery rates on other large sites in Dorset, experience of our local agents and Lichfield research. Assumptions are dealt with in more detail in para 55 of the MOU.

NB. Detailed spreadsheet.

For Council

Q.7

(a) Policy criteria justified and effective?

No. Criteria for Policy H5 should be amended as set out in the Reg 19 reps seeking the following minor amendments:

- *infrastructure requirements should be sought as financial contributions towards provision rather than actual physical delivery, and the wording should expressly state such contributions must be both appropriate and proportionate.*
- *inconsistencies between the requirements set out in the Infrastructure Delivery Plan and policy H5 are corrected.*
- *the requirement for a 'traffic statement or assessment of the likely impact on the safety risk at the level crossing and mitigation measures that satisfy Network Rail' should be reworded as this is not required by Network Rail and the existing evidence base confirms no severe impact.*
- *the requirement for community facilities should be updated to reflect the latest position set out in the MOU, namely an allowance for appropriate contributions towards the upkeep of existing facilities.*

(b) Change to Policy H4

No comment

Q8. (a) Delivery of SANGs?

The Wool SANG provision is agreed and is covered in para 35 - 38 of the MOU with the Council as 32.7 hectares located on land to the immediate south of 'land to the west of Chalk Pit Lane'. It comprises existing agricultural fields of 17 ha (also designated as a Scheduled Ancient Monument) and the northern portion of Coombe Wood (15.7 ha) as shown in the concept plan in the Appendix.

It is in the ownership of the Lulworth Estate who are also the primary landowner of the H5 Wool allocation. Additional suitable adjoining land is also available for any future additional housing beyond the 470 homes specified in policy H5.

(b) Wool SANG in relation to Ancient Woodlands?

Para 176 (c) of the NPPF states, inter alia, that development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland should be refused, unless there are wholly exceptional reasons.

Whilst the use of 48 hectares of Coombe Wood (including 44.5 hectares of Replanted Ancient Woodland) as a SANG (as referenced in [SD03] at para 5.3) remains appropriate for the reasons set out below, the latest SANG agreed with Natural England (NE) and Historic England (HE) (and outlined above) has since evolved. (See Appendix)

The agreed SANG now includes agricultural land (also a SAM) and therefore requires a much reduced area of Coombe Wood. Thus the area of Coombe Wood Replanted Ancient Woodland now proposed for SANG has reduced from 44.5 hectares to 12.2 hectares. Key elements such as car parking provision would be outside of the Replanted Ancient Woodland.

Coombe Wood is currently managed as commercial forestry with some informal public access. The SANG proposal would include a new management regime to enhance biodiversity, e.g. restoration of plantation coniferous woodland to native broadleaved woodland, and creation of a series of rides and glades along new walking routes. The SANG management plan would be agreed at the planning application stage with consultees, building upon the agreed SANG concept plan (S004).

In conclusion, the reduced area of Coombe Wood now required as SANG; the ecological survey work completed to date; the detailed 'in principle' pre-application consultations with Natural England and Dorset Council; and, the imposition of an appropriate management plan at the SANG planning application stage would all ensure no deterioration or loss of the Coombe Wood Replanted Ancient Woodland, and would actually deliver biodiversity and other woodlands enhancements compared to the existing commercial forestry management regime, and would therefore accord with NPPF guidance.

Q9. Wording of policy H1 cp to policies V1, H4, H5, H6 and H7 re number of homes?

Yes. The landowners have made representations that the figure 470 new homes in policy H5 should be preceded by '*at least*' rather than '*a total of*'.

Q10. Requirements of policies H5 sufficiently clear and effective?

Paragraph 16 sets out how plans should be prepared:

The Landowners do not believe some of the current wording of Policy H5 accords with the guidance in Para 16. Some minor changes would address these concerns. See answer to Q7a.

Issue 2: Housing Land Supply

Q1. Distribution of housing in policy H2 cp to spatial strategy?

Nowhere in the Council's Vision or Spatial Strategy is the total number of dwellings being planned for mentioned. Adding up the numbers in Policy V1: Spatial Strategy the number is 1735 yet this does not include 933 homes forecast from small sites and windfall. The total number (2668) number should be clearer in policy V1 and expressed as a minimum. The numbers proposed for individual allocations in policy H2 should also be expressed as minima, with the words '*at least*' inserted before the number of dwellings allocated.

Q2. Housing land supply in policy H2?

At the moment the housing mix for Wool is not fully finalised and can take account of SHMA and any up-dated policies from this Plan, as it moves towards adoption. The landowners

illustrative Masterplan makes provision for the Council's desired 65 bed care home. (See Viability Matters report.)

Q3. Neighbourhood Plans?

If there is any shortfalls from these Plans, the H5 site could take additional numbers upto 800.

Q4. 933 dwellings from small sites?

With small sites not being identified in Policy H8, that compelling evidence is not there. Again, if the Small Sites policy is found wanting or the Windfall allowance is considered unlikely to supply the predicted numbers, once again if there are any shortfalls, the H5 site could make up the shortfall.

Q5. Small sites policy justified and consistent with national policy?

As stated earlier it is not considered that Policy H8 accords with advice in para 68 of the NPPF, in failing to identify sites. If this policy is not found sound, additional numbers can be apportioned to the H5 site.

Q6. Flexibility re the supply of housing land?

The only flexibility there would appear to be would be in the fact that sites are not identified. This does not accord with Para 68 of the NPPF.

Q7. Completions and commitments?

This would seem a sensible approach. The NPPF states in para 75:

To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission.

Q8. (a) Housing trajectory realistic?

The histogram on page 50 of the Plan is unlikely to be an accurate reflection of the current housing trajectory. It will become more accurate, when the Council collates up to date trajectories provided by promoters of the allocated sites in MOUs.

Notwithstanding this, the trajectory as currently framed does make an over-reliance on unidentified small sites coming from the Small Sites policy and windfalls.

Whilst windfall allowance remains fairly constant during the 15 year plan period, delivery from unallocated small sites tails off significantly in the second half of the Plan period.

The Wool site in the MOU with the Council shows fairly constant delivery of circa 60 dwellings per annum until 2027-2028. If considered necessary this delivery could be increased by upping the numbers allocated to a revised H5 site. Additional delivery could come later in the Plan period to be shown in the later part of the trajectory.

(b) The change (MM4)? Implications on delivery and phasing.

For the Council

Issue 3: 5YHLS

Q1.

(a) delivery of a 5-year housing land supply?

(b) current position?

(c) Is there a 5-year supply?

(d) How has this been calculated?

For the Council to respond to, albeit the HBF letter to the Council dated 3 December 2018 is noted. The 5YHLS report by the LPA of May 2019 is also relevant.

Issue 4: Other housing policies

Q1. (a) Policy H3?

Yes subject to matters raised in the Viability Matters report

(b) Change to the policy (MM5)?

Electric charging points change is supported

(c) Wording of the policy?

No comment

Q2. No comment.

Q3. No comment

Q4. (a) Requirements of policy H8 justified?

Requirement b. is stiff test which many in the villages affected will argue applies to their village so weakening the policy's ability to deliver the desired number of dwellings.

(b) Cumulative impact?

Not as far as is evident. For example cumulative impacts on AONB and Heritage Coast should be assessed.

(c) Policy H8 and Green Belt?

Para 145 of the NPPF lists exceptions to new buildings in the green belt being inappropriate. Exception e) is *limited infilling in villages*. MM7 suggests: *on sites positioned directly in-between existing buildings, within ~~and around the edges of~~ towns and villages will be permitted*. Whilst this change on the one hand defines *limited infilling* more restrictively, on the other it extends the exception to towns as well as villages contrary to exception e) in para 145.

For yet another reason it is considered that Policy H8 is unsound.

(d) Policy H8 sufficiently clear and effective?

In relation to green belt, in view of the comments above it is not.

Applications for small sites is loose drafting. How many sites around settlements might there be?

Is *adjacent to existing homes* a clear enough definition? What if the development was adjacent to a church, school, other non-residential building or even a park in the settlement?

Policy H8 is unsound.

Q5. (a) Policy H9 assessment?

Policy H9 has two paragraphs regarding elderly persons housing and the relationship between the two needs better explanation. Further justification for the requirements is also needed.

(b) Requirements of the policy?

Whilst 5% self-build plots and 10% single storey dwellings are laudable aims, the Council must show evidence that the demand is there for such a figure and that it has tested the viability on sites of such a requirement.

(c) Policy H9 sufficiently clear?

This should be a criteria based policy which is backed-up by a strong evidence base.

Q6. No Comments

Q7. Policy H11 (Affordable Housing)?

No. Our appended Viability Matters report concludes that:

Affordable housing provision for Wool should be set at 30% and that a more flexible affordable housing tenure mix should also be permitted

This matter is also covered in para 64 of the MOU.

Q8. No comment

Q9.No comment

Q10. No comment

Q11. No comment

Q12. No comment

Q13. No comment

Statement on Matter E: Housing

List of appendices

Appendix 1 – Wool Vision Plan – 1000, 650 and 470 homes

Appendix 2 – Viability report

Appendix 3 – SANG concept plan

Appendix 1 – Wool Vision Plan – 1000, 650 and 470 homes



title Illustrative Masterplan

project Wool Masterplan

client Weld Estate/Redwood Partnership

job no WPL 262769

drawing no MP001

revision C (07 Mar 2018)

date 07 Jan 2016

drawn by SP/ SM

checked by CO/ RB

Development Parcels

Public Open Space

School Grounds

Existing Road

Proposed Primary Street

Proposed Secondary Street

Public Rights of Way

Proposed Footpath

Trees/ Hedgerows

Listed Buildings

Proposed Local centre

Vehicle Access Point

Cycle and Pedestrian Access

Allotment

Sport Pitches

NEAP

LEAP

Area of Natural Play

SuDS

Community Garden

Food Store

Community Centre & Village Hall

The Wellbridge Practice

Site Boundary

Scale 1:5000 @A3

urban design studio

Southampton
Birmingham
Cambridge
London
Oxford
savills

savills.com/urbandesign



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title: Wool Vision Plan - 650 homes
 project: Wool Masterplan
 client: Weld Estate/Redwood Partnership
 job no: WIPL 425429
 drawing no: MP002
 revision: -
 date: 03 December 2018
 drawn by: SM
 checked by: RB

- Land reserved for future school, if required
- Neighbourhood Equipped Area for Play
- Local Equipped Area for Play
- Public open space
- SuDS basin/public open space
- SuDS swale
- Existing public right of way
- Proposed pedestrian and cycle link to wider countryside/rights of way
- Site Boundary
- Scale 1:5000 @A3



Approximate Total no. of new dwellings:	470 homes
Total housing area:	13.22ha

title: Wool Vision Plan - 470 homes

project: Wool Development

revision: A (6 June 2019)

client: Weld Estate/Redwood Partnership

date: 28 March 2019

job no: WIPL 425429

drawn by: SM/VT

drawing no: MP003

checked by: RB

- Land reserved for future school, if required
- Neighbourhood Equipped Area for Play
- Local Equipped Area for Play
- Public open space
- SuDS basin/public open space
- SuDS swale
- Existing public right of way
- Proposed pedestrian and cycle link to wider countryside/rights of way
- Site Boundary
- Scale 1:5000 @A3
- 20m buffer from pipeline centre (suggested maximum working area to allow pipeline removal)

Appendix 2 – Viability Matters report

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.1. Summary

1.1.1. This report expands on our Regulation 19 representations which considered whether Dorset Council (DC) (previously Purbeck District Council) had presented appropriate evidence and came to reasonable conclusions that accorded with the Government's viability guidance as set out in the NPPF and the PPG section entitled '*Viability and plan making guidance*'.

1.1.2. In essence there is now a greater focus on viability at the plan making stage with the aim that viability assessment '*should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine the deliverability of the plan*'. In terms of affordable housing in particular, but also for other policy requirements, the PPG states these should be '*set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage*' (PPG, Para 002 – Ref ID 10-002-20190509).

1.1.3. Other relevant guidance from the NPPG includes the need to consider the specific circumstances of strategic sites (PPG, Para 005 – Ref ID 10-005-20180724) and for any viability assessment to be '*supported by appropriate available evidence informed by engagement with developers, landowners and infrastructure and affordable housing providers*' (PPG, Para 010 Ref ID 10-010-20180724).

1.1.4. This report concludes that the Wool site is considered viable and deliverable provided the policy requirements are appropriately balanced against the costs of bringing larger sites forward for development.

1.1.5. In this regard, as indicated in our previous written representation and expanded upon in this report, we feel a number of the viability inputs used by DC in their evidence base (i.e. the reports by DC's consultants Dixon Searle Partnership (DSP)) are set at levels which combined overestimate the site's ability to provide affordable housing at 40%. We consider a level at 30% to be more reflective of the overall scheme viability for the Wool allocation.

1.1.6. The viability assumptions we are most concerned with relate to the low Greenfield Benchmark Land Value (BLV) applied by DC's consultants DSP and no inclusion for external works.

1.1.7. An additional contributing factor as to why a lower level of affordable housing is appropriate is a result of DC's fixed affordable housing tenure mix as set out in policy H11 of 10% social rented, 65% affordable rented and 25% affordable home ownership. Both social rented and affordable rented housing significantly impact viability due to their much lower sales values compared to affordable home ownership.

1.1.8. Overall it is concluded that affordable housing provision for Wool should be set at 30% and that a more flexible affordable housing tenure mix should also be permitted.

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.2. Introduction

1.2.1. Whilst supportive of the overall approach to viability set out in the DSP 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our Regulation 19 Representations highlighted DSP's own conclusions that the 40% affordable housing target is 'challenging' for Wool under some assumptions' (para 3.3.5 and 3.3.8). Also changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results' (3.3.10).

1.2.2. Our Regulation 19 representations set out our clients comments on some of the assumptions used in the DSP viability assessment and minor inconsistencies between infrastructure requirements set out in PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment. Our representations agreed that a 40% affordable housing target was 'challenging', and that 30% is a more realistic expectation for the Site, depending on the precise costs, While likely development costs are a key determining factor in reaching this conclusion so is the Council's current Affordable Housing tenure mix. The current policy allows for only 25% shared ownership. Viability would be improved by increasing this level. As stated in our previous Regulation 19 representation we consider a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership more appropriate

1.2.3. This report sets out further evidence in support of our previous Regulation 19 written representation, addressing the following viability assumptions which should be read in conjunction with our earlier representation.

- Actual affordable housing delivery
- Benchmark Land Value
- Sales Values
- Construction and Sales Timescales
- Developer's Contingency
- External Works
- Infrastructure Cost & s106
- Estate Management/Public Realm Management costs

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



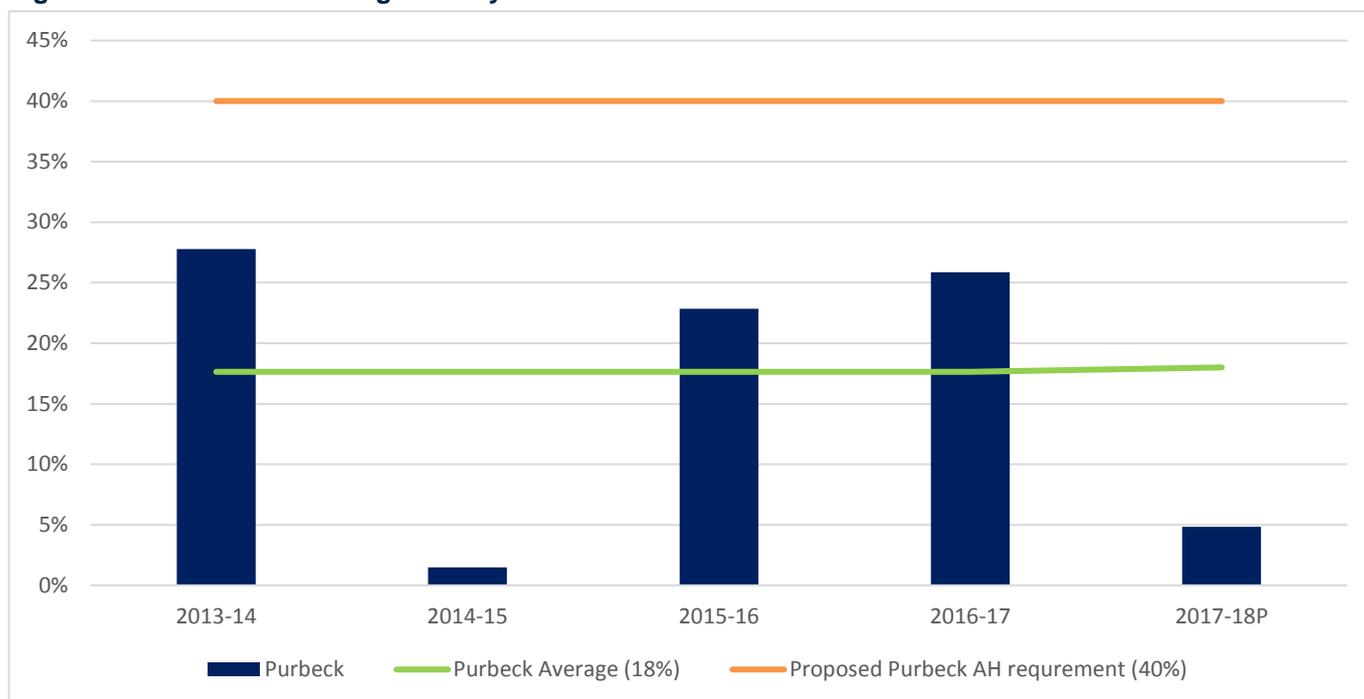
1.3. Actual Affordable Housing Delivery

1.3.1. The submission Local Plan sets a 40% affordable housing requirement for the Wool allocation. As detailed below we feel a number of viability assumptions used in Purbeck Updated Viability Study (October 2018) are generous and inflate the overall viability of the Wool allocation. The proposed 40% threshold is also much higher than Affordable Housing delivery in Purbeck over the last 5 years as indicated in **Figure 1**.

1.3.2. To compile these results we compared net additions in the dwelling stock¹ (completions overall) with total additional affordable dwellings² in Purbeck based on MHCLG figures. Purbeck's total affordable housing delivery over the last 5 year has ranged from a low of 1% in 2013-14 to a high of 28% in 2016-17. The average affordable housing delivery in Purbeck over the last 5 years has been 18%, well below the proposed policy requirement.

1.3.3. This helps to establish just how challenging the proposed 40% Affordable Housing threshold is and questions whether it meets the Planning Practice Guidance requirement that '*affordable housing, should be set at a level that.....allows....development to be deliverable, without the need for further viability assessment at the decision making stage*' PPG, Paragraph: 002 Reference ID: 10-002-20190509.

Figure 1 – Affordable Housing Delivery



Source: MHCLG Data, Savills analysis (2019)

¹ Table LT122, MHCLG

² Table 100BC, MHCLG

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.1. Sales Values

1.1.1. The Purbeck Updated Viability Study (October 2018) has allowed an open market value for residential units of £3,300 psqm (£307 psqft) under its base scenario (Set 1 – Lower Values, Appendix IIc, Table 3a). This is followed by a further sensitivity test at 10% higher values (Set 2 – Typical Values, Appendix IIc, Table 3b). While some schemes may achieve higher sales values than those assumed under Set 1 (£3,300 psqm) this will likely be dependent on providing a bespoke product at higher than normal build costs. A local example is the Farrer Estate in East Stoke which is a small scale (9 plots), low density scheme with a high quality finish. This is a different development to the proposed Wool allocation for circa 470 homes to be delivered by multiple outlets as a much larger site providing a range of housing types, including affordable.

1.1.2. For this reason the Set 1 results should constitute the baseline testing. Savills analysis (see **Appendix A**) of the local new build market broadly supports the Set 1 values. These values are also considered appropriate based on research Savills has undertaken which demonstrates the connection between price and the pace of delivery. As we discuss below the delivery trajectory of a 48 month construction and delivery period used in the Council's viability testing for the Wool allocation is not considered realistic. A more realistic delivery trajectory of 96 months has been discussed with the Council as part of the MoU process. This is discussed further below within sub section 'Construction and Sales Timescales.'

1.1.3. To ensure this delivery trajectory is achieved the open market units will need to be appropriately priced, especially considering 470 homes represented a significant level of new stock into the local market that will be sold across multiple competing outlets. Savills research shows that sites with residential values above £300 psqft are more likely to sell at a discount to their local market compared with lower values areas. The general conclusion being developments in more expensive areas are typically less affordable and need to be priced competitively to sell at a good rate.

1.1.4. As can be seen from **Figure 2** below, areas that have similar sales value to Wool of circa £300 psqft (light blue circles relating to Aylesbury, Bicester, Andover, Biggleswade etc) or higher sold at a discount to their local market. This evidence supports Savills view that larger sites may have to sell at a discount to the local market to maintain their required rate of delivery. This again supports the Set 1 values as being the most appropriate in the Council's viability testing..

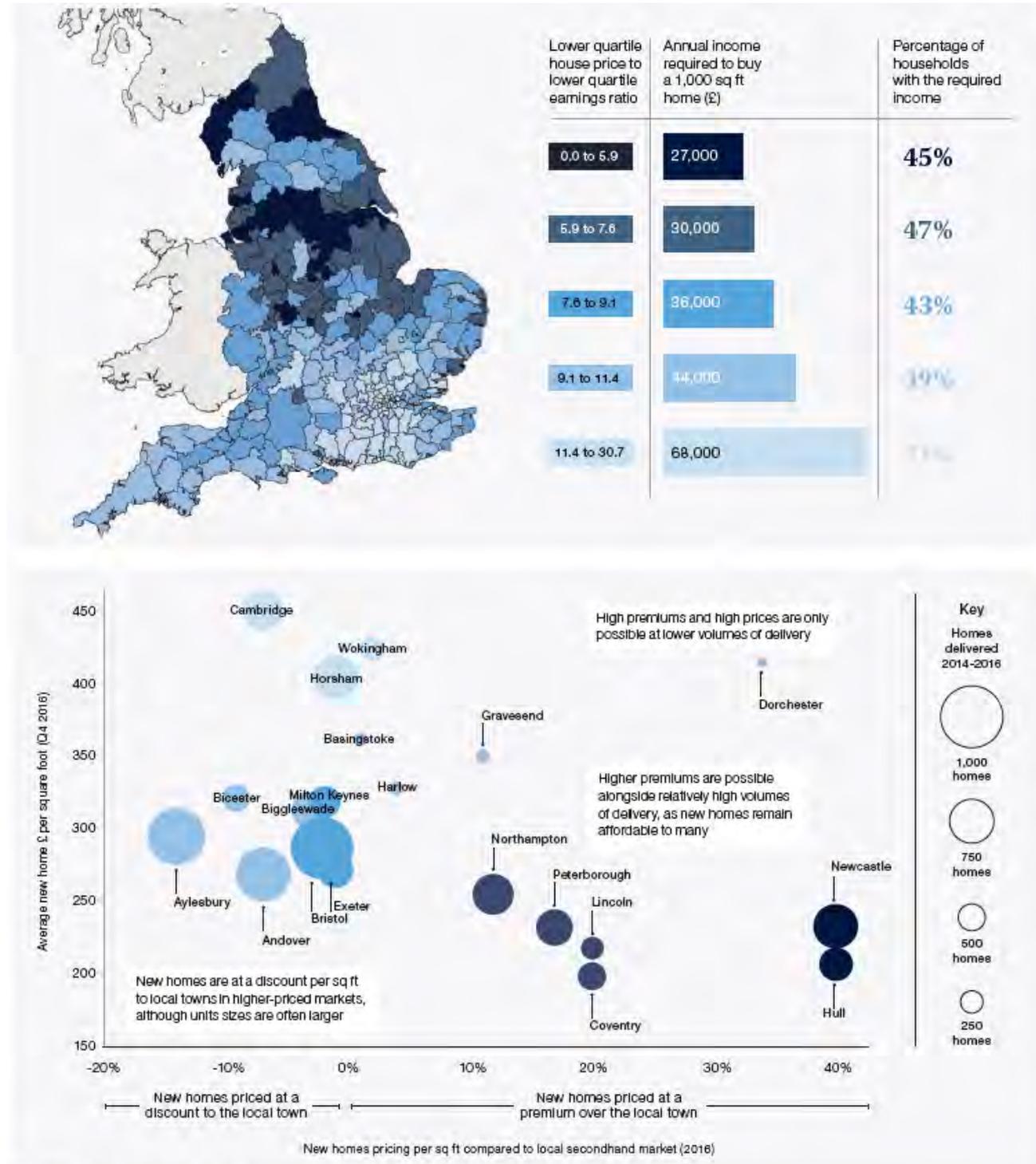
Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



Figure 2 – Pricing and delivery



Source: Savills Research using DCLG, HM Land Registry and CACI

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.2. Benchmark Land Value (BLV)

1.2.1. The Council's Local Plan & CIL Viability Update (2018) notes Greenfield land values typically range between £250,000 / gross hectare to £370,000 / gross hectare. Without further explanation the viability modelling applies a Greenfield BLV at the lowest end of this range of £250,000/ gross hectares.

1.2.2. This is a significant assumption to make as the BLV is essentially the hurdle rate for assessing viability – when a scheme's Residual Land Value (RLV) is lower than the BLV the scheme would need to have either a lower infrastructure cost requirements and / or lower affordable housing to move back above the BLV. Site characteristics such as location, site access, access to amenities and employment by sustainable transport methods, and policy requirements governing infrastructure all have a bearing on site BLV. In this regard the Wool site is –

- A sustainable urban extension to the existing Wool settlement;
- Located on the main railway line from London Waterloo to Weymouth;
- Conveniently located in respect of existing amenities in Wool and local jobs opportunities such as the Dorset Innovation Centre; and
- Not saddled with high infrastructure costs such as a new roads/major junction improvements; nor high abnormal costs such as decontamination or major ground works.

1.2.3. Given these site characteristics we see no evidence to demonstrate why the Local Plan & CIL Viability Update (2018) used the low Greenfield BLV of £250,000 / gross hectare. As can be seen from **Table 1** this is a low assumption compared to other local planning authorities both in the South West and UK. Notably the evidence tabulated below has been prepared by a number of different viability consultants with most applying a Greenfield BLV of above £300,000 / gross hectare.

1.2.4. Tandridge is one of the exceptions. It also uses a BLV of £250,000 / gross hectare relating to Greenfield land. However the site context is critical to consider here as it relates to a very large and complex Garden Village site. It is proposed to deliver up to 2,000 homes across 459ha with enabling infrastructure costs of over £170 million including new junction improvements, several new schools, health and social hub, new internal spine road, and improvements to the train station. Obviously this is a much larger, more complex and costly site to develop than the proposed Wool allocation. Even though the GVA report proposed this lower Greenfield BLV it also notes the high BLV rate of £370,000 / gross hectare proposed in the earlier BNPP study as being within a *'reasonable range for greenfield development value in general terms.'*³

³ South Godstone Garden Community, Financial Viability Assessment – DRAF (December 2018), GVA, para 6.5, p17

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



Table 1 – Greenfield Land Value Comparisons

Local Planning Authority Area	Greenfield Land BLV / Gross Hectare
South West	
Poole	£420,000 ⁴ (for strategic site typologies)
North Dorset	£400,000 ⁵ (based on Gillingham Strategic)
Wiltshire	£330,000 ⁶ -£360,000 (Greenfield)
Basingstoke & Deane	£400,000 ⁷ (for Greenfield Strategic)
Test Valley	£350,000 ⁸ (lower value Strategic Greenfield) to £500,000 (higher value Strategic Greenfield)
Other UK	
South Kesteven	
Tandridge	£250,000 ⁹ (Godstone Garden Community) to £370,000 ¹⁰ (Greenfield)

Source: Savills analysis (2019)

1.2.5. Increasing the Greenfield BLV to between £300,000 to £400,000 / gross hectare, consistent with many other Local Planning Authorities, would demonstrate the Set 1 RLV results (Appendix IIc, Table 3a of the viability study) are unviable at 40% affordable housing. In fact the DSP development option including 20% sheltered housing / retirement housing at 40% affordable (and 20% Profit) is below even DSP's BLV of £250,000 / gross hectare. This is shown graphically in **Figure 3** below. If Affordable Housing is set at 30% the more realistic BLVs of £300,000 to £400,000 / gross hectare can be achieved. These results are improved further if profit is set at 17.5% (which we consider only useful as a sensitivity test).

1.2.6. **Note the appraisal results below relating to 30% maintain all of DSP's other viability assumptions (Set 1 Sales Values). Only the Affordable Housing level has been altered. In a later section of this Appendix we explore the impacts on RLV when external works are included.**

⁴ Poole Borough Council Local Plan and CIL Viability Study Update Report (June 2017), BPA

⁵ North Dorset District Council Plan viability, CIL and affordable housing study (February 2015), BPA

⁶ Wiltshire Local Plan Viability Study (February 2014), HDH Planning & Development

⁷ Basingstoke & Deane CIL Viability Study (March 2016), Three Dragons

⁸ Test Valley Community Infrastructure Levy: Viability Study (July 2014), BNPP

⁹ South Godstone Garden Community, Financial Viability Assessment – DRAF (December 2018), GVA

¹⁰ Tandridge Draft Local Plan: Viability Assessment (June 2018), BNPP

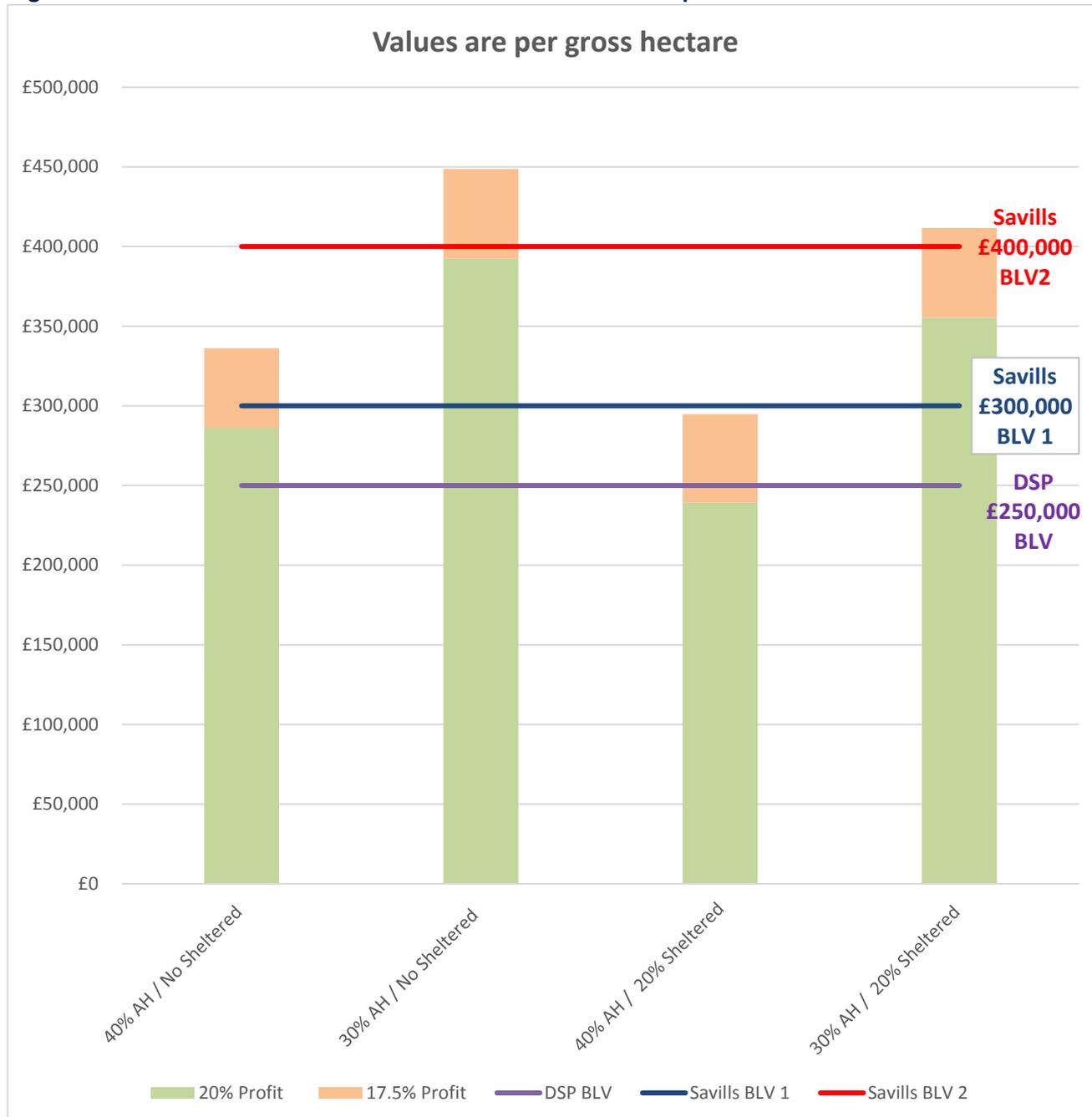
Appendix 2 – Viability Matters

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Figure 3 – Residual Land Values at 40% and 30% Affordable compared to Greenfield Benchmark Land Values



Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.3. External Works

1.3.1. As outlined in our Regulation 19 response it is normal practice to apply an allowance for external costs (“externals”) to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, including pathways, hedgerows, trees and planting and car parking provision. We note that this has **not** been applied to the larger allocations within the appraisals. This is not an infrastructure cost so should not be wrapped up within the £23k per unit allowance used in the viability modelling.

1.3.2. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 of the Viability Study but these seem to have been excluded from the appraisals in Appendix 2 of the Viability Study. We agree with the allowance for externals of 10% – 15% as an addition to BCIS baseline build costs within the modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

1.3.3. **Table 2** demonstrates many other local plan and CIL viability studies include an allowance for external works within their viability modelling.

Table 2 – External Works Comparisons

Local Planning Authority Area	External Works (for residential development)
South West	
Poole	10%
North Dorset	10%
Wiltshire	10% for smaller sites, 20% for larger greenfield sites
Test Valley	22% inclusive of demolition, site preparation, external works, and for car parking (BNPP)
New Forest	10%-15% ¹¹
Isle of White	15% ¹²
Other UK	
South Kesteven	10% for smaller site, 20% for the larger, multi-phase/outlet greenfield schemes
Tandridge	15% (BNPP Viability Study)

Source: Savills analysis (2019)

1.3.4. The impact of adding a 10% externals to base build costs is shown in Figure 4 below. We compare the revised Residual Land Values with both DSP’s Greenfield BLV and Savills higher range consistent with other local plan viability studies.

1.3.5. Note the appraisal results below maintain all of DSP’s other viability assumptions (Set 1 Sales Values) but with inclusion of 10% external works.

¹¹ Community Infrastructure Levy Viability Assessment, DTZ

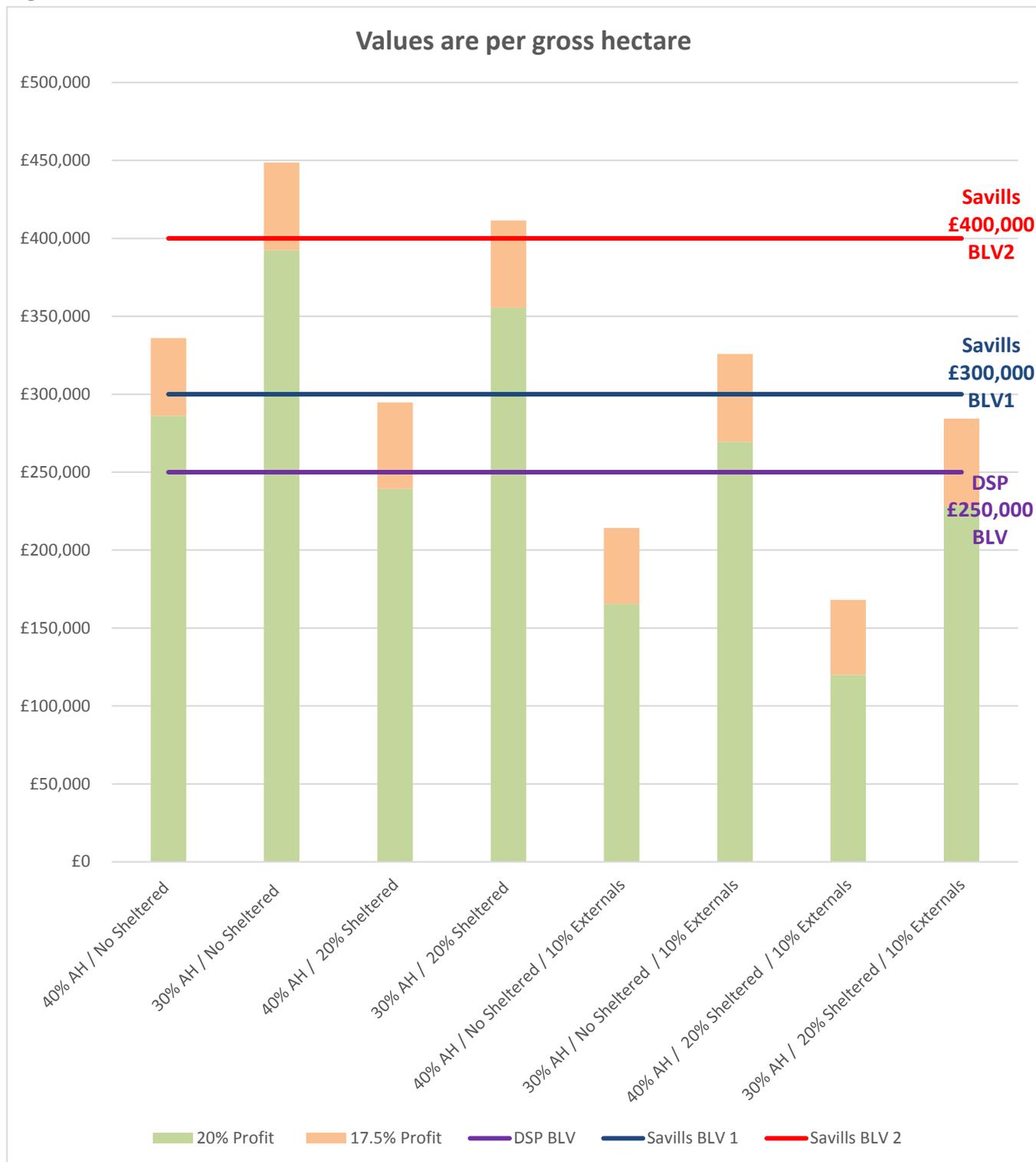
Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



Figure 4 - Residual Land Values with 10% externals added



Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.3.6. This analysis demonstrates the impact of adding external works on RLV. RLVs can only achieve Savills higher suggested BLVs when affordable housing is reduced to 30% and profit is maintained at the more standard 20% of Gross Development Value (GDV). At 40% the majority of DSP's development options are well below Savills low range BLV of £300,000 / gross hectares even when a low developer's profit of 17.5% is applied. The modelling also shows the impact of the Council's preferred Affordable tenure mix and Sheltered / Retirement Housing requirements. Social Rented and Affordable Rented properties in particular achieve much lower values compared to Affordable Home Ownership.

1.4. Infrastructure & s106 costs

1.4.1. An allowance of £23,000 per dwelling has been made by DSP for infrastructure costs. This is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling).

1.4.2. On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This excludes external works costs.

1.4.3. In terms of s106 costs the further consultation and design work completed by the Wool landowners has indicated that the overall s106 costs increase from the DSP assumption of £3,618,571 to approximately £4,358,860. Further details are outlined in the summary table at Appendix 2..

1.4.4. These higher s106 costs should be rerun within the DSP appraisals.

1.5. Construction and Sales Timescales

1.5.1. A construction period of 48 months has been assumed for the 466 no. dwelling typology relating to the Wool allocation. As noted in our previous (Regulation 19) written representation this is considered too short a timeframe based on two outlets on site.

1.5.2. Following the Regulation 19 consultation Savills has been working on a MoU with the Council. Both parties have agreed to the following delivery trajectory. The agreed construction period spans 8 years (or 96 months). This is double the period seemingly allowed for (48 months) in the Local Plan & CIL Viability Update (2018).

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



Table 3 – Revised delivery trajectory for Wool allocation, MoU with Purbeck

April 2018-April 2019	2019- 2020	2020- 2021	2021- 2022	2022- 2023	2023- 2024	2024- 2025	2025- 2026	2026- 2027
0	0	20	65	65	65	65	65	65
2027- 2028	2028- 2029	2029- 2030	2030- 2031	2031- 2032	2032- 2033	2033- 2034		
60	0	0	0	0	0	0		

1.5.3. This revised delivery trajectory, agreed with the Council, is based on a maximum annual delivery rate of 65 dwellings. This is based on local market knowledge attained from Savills local agents and Lichfields Research.

1.5.4. The increased timeframe from 48 months (applied in Local Plan & CIL Viability Update) to 96 months (discussed through the MoU process with the Council) will likely increase the finance costs tested by DSP. This revised delivery trajectory should be included in future re-runs of the DSP appraisals.

1.6. Developer's Contingency

1.6.1. In our previous written representation we expressed concern that contingency was applied at a rate of only 3%.

1.6.2. We maintain a 5% contingency as being more appropriate given the Local Plan & CIL Viability Update (2018) represents front loaded viability evidence to support the Local Plan allocations and policies. While we have been working continuously with the Council to further refine scheme specific costs, as outlined in the MoU, this process is still being undertaken without the benefit of full scheme details and technical evidence. This further work will be forthcoming when a planning application is submitted. In saying this a number of technical studies have been commissioned to progress master planning work from the initial Concept Framework Document (March 2018) to the indicative masterplans submitted at the Regulation 19 stage, and these support the proposed allocation as being deliverable including –

- Ecological Deliverability Report, including SANG Provision
- Flood Risk and Surface Water Technical Overview Report, including hydrological modelling and deep borehole testing
- Transport Strategy and Assessment
- Railway Level Crossing Queue Length Study
- Access Strategy including site access drawings
- Utilities Appraisal Report
- Foul Capacity Investigation

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



- Phase 1 and 2 Ground Condition Assessment (part of site only)
- Heritage Appraisal
- Geophysical/Magnetometer Surveys (full site)
- Archaeological Trial Trench Evaluation (part site)
- Mineral Feasibility Report
- Topographical Surveys
- SANG Concept Plan
- MoU process
- Viability testing

1.6.3. Despite this significant amount of preliminary work the scheme will be further refined towards submission of a planning application. It is important that a level of conservatism is inbuilt within the viability testing to account for ‘unknown’ costs that may arise. A 5% contingency is considered a standard assumption in this regard and has been applied in many Local Plan and CIL viability studies in the south west and across the UK (see **Table 4**). We also note DSP has used 5% contingency in the past in previous viability modelling they have undertaken. For instance when preparing the Test Valley Borough Council – Affordable Housing Viability Assessment Update DSP state–

‘An allowance of 5% of build cost has also been added to cover contingencies. This assumption is a relatively regular one in our experience. Reduced contingency levels at say 3% are seen too, but our preference for this purpose is to make sure that adequate allowances have been made.’

Table 4 – Contingency Comparisons

Local Planning Authority Area	Contingency
South West	
Poole	5%
North Dorset	5%
Wiltshire	5%
South Somerset	5% ¹³
Test Valley	5%
Other UK	
South Kesteven	2.5% (undeveloped Greenfield sites 5% (Brownfield sites)
Tandridge	5% (BNPP Viability Study ¹⁴) 5% build costs % 10% infrastructure, utilities, enabling & services (GVA Viability Study) ¹⁵

Source: Savills analysis (2019)

¹³ South Somerset Community Infrastructure Levy Viability Assessment Update Addendum Report (July 2015)

¹⁴ Tandridge Draft Local Plan: Viability Assessment (June 2018), BNPP

¹⁵ South Godstone Garden Community, Financial Viability Assessment – DRAF (December 2018), GVA

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.6.4. While the Wool allocation benefits from the results of various preliminary technical reports which indicate no known abnormal costs at this stage, there are a number of site specific issues that could attract additional costs in delivering the site including –

- Sloping topography for site
- Estate Management/public realm management costs

Sloping topography

1.6.5. A Ground Condition Assessment has been commissioned for the 'land to the west of Chalk Pit Lane and Oakdene Road' given its sloping topography. While the report's conclusion indicates additional financial risk is low to negligible it does state at para 9.4 that cut and fill will be required –

*9.4.4 Due to the site's sloping topography it is anticipated that areas of cut and fill will be required to form level platforms for the proposed development.*¹⁶

1.6.6. The additional costs of cutting and filling include the creation of level terraces, landscaping work to create retaining walls for drives and paths, and the additional cost of designs. As a general rule, each 5° of slope from level (circa 1:11m gradient) on the site will increase your build costs by £5,000 (according to Brinkley's Slope Law proposed by Mark Brinkley, author and HB&R Contributing Editor).

1.6.7. The above general rule corresponds with conditions within Plot C where the majority of the slope has a gradient of between 1:9.9 and 1:12.5. These are indicated by the dark purple shading (1:12.5 slope) and the orange shading (1:9.9 slope) shown in **Figure 5** below.

¹⁶ Plot C, Wool Urban Extension, Dorset Phase 1 and 2 Ground Condition Assessment (Contamination and Geotechnical), PBA, January 2017, p20

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



Figure 5 – Sloping topography, land to the west of Chalk Pit Lane and Oakdene Road, Wool allocation



Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.6.8. The above areas therefore may add additional costs for cut and fill. This again supports applying a standard contingency at 5% consistent with other local plan and CIL viability studies.

Estate Management/Public Realm Management Costs

1.6.9. As we discuss below larger schemes in particular can incur considerable costs in managing and maintaining public areas of open space and public realm. While these costs are typically met over the longer term by an annual service charge on residential units and/or the commercialisation of commercial spaces (where possible) there will be an initial set up cost and a likely lag between the public realm and open spaces being in place and all the houses being build and sold (with a service charge applied). It is our view the Council's modelling should incorporate these costs.

1.6.10. Larger developments are increasingly required to have in place strategies for the long term management and maintenance of the overall 'estate', including public realm and green spaces. Policy H5 relating to the Wool allocation includes a number of requirements that could require long term management and maintenance strategies including –

- Forming or improving defined walking and cycling routes;
- Exploring opportunities to enhance, the significance of heritage assets including: scheduled monuments, listed buildings on neighbouring land and non-designated heritage assets within development sites; and
- The provision of 11.98ha of open space and 32.7ha of SANG land.

1.6.11. The cost of long term management and maintenance can be offset somewhat by commercialisation of the common areas to contribute to its sustainable operation. This may include for example recreational uses, a supporting café, local retail, use of community facilities for out of hours clubs, classes etc. This would typically be organised by a dedicated estate management company comprised of independent professionals, the scheme developer, the Council and residents.

1.6.12. In many cases the development itself will also need to make a contribution to the management and maintenance costs, the most common include –

- A service charge, which can be levied on homes at a nominal rate which nevertheless provides substantial annual income whilst having no effect on sales values.
- An estate management company retaining a head-rent on commercial space, for Wool this could potentially be over the retail unit.

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



1.6.13. While it is too early in the process to define which strategy may be adopted we feel it's appropriate to have an allowance included in the viability modelling either through an additional cost per unit of circa £1,500 per unit, or alternatively by increasing the contingency level from the current assumption of 3% to 5% as discussed above. We feel the above level is appropriate given the predicted service charge for apartments at the Farrer Estate site in East Stoke is £1,500 per annum. The viability testing for the South Godstone Garden Community in Tandrige includes a much higher Estate Management allowance of £3,000 per units.

1.6.14. While estate management costs are typically met over the longer term by an annual service charge on residential units and/or the commercialisation of commercial spaces (where possible) there will be initial set up cost and a likely lag between the public realm and open spaces being in place and all the houses being build and sold (with a service charge applied).

Appendix 1: Local Sales Values

Appendix 2: S106 Costs - Headline comparison with Purbeck IDP and Viability Report Assumptions

Appendix 2 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

Examination Statement - Savills on behalf of the Landowners of the H5 Wool allocation



Wool, Wareham, Dorset												
Resale Sold Prices 1.1.17-1.10.18												
No	Address	Date Sold	Sold Price	Estimated	New Build	Property T	No. of bed	Estimated	Floor area sq ft	Price per sq ft	Market Price per sq ft	Tenure
1	5, Back Lane, Wool, Wareham, Dorset	25/01/2017	171500	168979	N	Flat		2	624.31	274.7	270.67	Leasehold
2	72, Dorchester Road, Wool, Wareham, Dorset	06/04/2017	168000	178050	N	Flat		2	645.83	260.13	275.69	Leasehold
3	Flat 14, Fairfields, Station Road, Wool, Wareham, Dorset	06/10/2017	132000	128625	N	Flat		2	495.14	266.59	259.78	Leasehold
4	18, Lower Hillside Road, Wool, Wareham, Dorset	04/12/2017	157500	152715	N	Flat		2	624.31	252.28	244.62	Leasehold
5	Flat 3, Bindon, Dorchester Road, Wool, Wareham, Dorset	08/02/2018	155000	153848	N	Flat		02-Mar	694.7	223.12	221.46	Leasehold
			£156,800							£255.36	£254.44	
No	Address	Date Sold	Sold Price	Estimated	New Build	Property T	No. of bed	Estimated	Floor area sq ft	Price per sq ft	Market Price per sq ft	Tenure
1	14, Cowslip Close, Wool, Wareham, Dorset	13/04/2017	194000	205606	N	Semi-detached		02-Mar	901.8	215.13	228	Freehold
2	5, Macville Avenue, Wool, Wareham, Dorset	25/05/2017	270000	283051	N	Detached	2		706	382.43	400.92	Freehold
3	Tregantle, Lulworth Road, Wool, Wareham, Dorset	20/12/2017	260000	252102	N	Detached		2	699.65	371.61	360.32	Freehold
4	26, Jeremy Close, Wool, Wareham, Dorset	04/01/2018	205000	200184	N	Terraced		2	742.71	276.02	269.53	Freehold
5	11, Oakdene Road, Wool, Wareham, Dorset	06/03/2018	287000	284426	N	Detached		02-Mar	569.41	504.03	499.51	Freehold
6	Bankside, Chalk Pit Lane, Wool, Wareham, Dorset	04/04/2018	305000	310848	N	Detached		02-Mar	801.91	380.34	387.63	Freehold
7	1, The Square, Wool, Wareham, Dorset	25/05/2018	258000	264494	N	Semi-detached		02-Mar	822.36	313.73	321.63	Freehold
8	Barnaby Cottage, High Street, Wool, Wareham, Dorset	29/06/2018	280000	291905	N	Semi-detached		2	527.43	530.88	553.45	Freehold
			£257,375							£371.77	£377.62	
No	Address	Date Sold	Sold Price	Estimated	New Build	Property T	No. of bed	Estimated	Floor area sq ft	Price per sq ft	Market Price per sq ft	Tenure
1	4, The Poppies, Wool, Wareham, Dorset	06/01/2017	210000	206913	N	Terraced	3		723.98	290.06	285.8	Freehold
2	2, Lampton Close, Wool, Wareham, Dorset	06/01/2017	287500	283274	N	Detached	3		775	370.97	365.51	Freehold
3	2a, Colliers Lane, Wool, Wareham, Dorset	24/03/2017	322000	331823	N	Detached	3		913.32	352.56	363.32	Freehold
4	Riversdale, East Burton Road, Wool, Wareham, Dorset	10/03/2017	295000	304000	N	Semi-detached		3	1022.57	288.49	297.29	Freehold
5	14, Cowslip Close, Wool, Wareham, Dorset	13/04/2017	194000	205606	N	Semi-detached		02-Mar	901.8	215.13	228	Freehold
6	7, Lark Rise, Wool, Wareham, Dorset	31/05/2017	248000	259987	N	Semi-detached	3		947.22	261.82	274.47	Freehold
7	8, Jeremy Close, Wool, Wareham, Dorset	05/06/2017	265000	270614	N	Semi-detached	3		807.29	328.26	335.21	Freehold
8	7, Lawrence View, East Burton Road, Wool, Wareham, Dorset	01/08/2017	262000	257616	N	Terraced		02-Mar	930.22	281.65	276.94	Freehold
9	9a, Colliers Lane, Wool, Wareham, Dorset	27/10/2017	332000	323512	N	Detached		02-Mar	963.48	344.59	335.78	Freehold
10	80, Dorchester Road, Wool, Wareham, Dorset	10/11/2017	232000	225231	N	Terraced		02-Mar	925.7	250.62	243.31	Freehold
11	Levant, Chalk Pit Lane, Wool, Wareham, Dorset	22/02/2018	285000	282883	N	Semi-detached		3	1054.86	270.18	268.17	Freehold
12	11, Oakdene Road, Wool, Wareham, Dorset	06/03/2018	287000	284426	N	Detached		02-Mar	569.41	504.03	499.51	Freehold
13	54, Dorchester Road, Wool, Wareham, Dorset	09/03/2018	275000	272533	N	Terraced		02-Mar	957.99	287.06	284.49	Freehold
14	27, Colliers Lane, Wool, Wareham, Dorset	09/03/2018	285000	282443	N	Detached		3	856.81	332.63	329.65	Freehold
15	Andakane, Duck Street, Wool, Wareham, Dorset	27/04/2018	358000	364864	N	Detached		3	1001.9	357.32	364.17	Freehold
16	Bankside, Chalk Pit Lane, Wool, Wareham, Dorset	04/04/2018	305000	310848	N	Detached		02-Mar	801.91	380.34	387.63	Freehold
17	18, Lampton Close, Wool, Wareham, Dorset	11/05/2018	262000	268595	N	Semi-detached		3	904.17	289.77	297.06	Freehold
18	1, The Square, Wool, Wareham, Dorset	25/05/2018	258000	264494	N	Semi-detached		02-Mar	822.36	313.73	321.63	Freehold
			£275,694							£317.73	£319.89	
No	Address	Date Sold	Sold Price	Estimated	New Build	Property T	No. of bed	Estimated	Floor area sq ft	Price per sq ft	Market Price per sq ft	Tenure
1	4, Spring Street, Wool, Wareham, Dorset	30/06/2017	340000	347202	N	Terraced	4		1297.05	£262.13	£267.69	Freehold
									Overall Average	£301.75		

Headline Comparison with Purbeck IDP and Viability Report Assumptions

*source: Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summa

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – 'developer contributions' and 'cost' columns	Costs appearing in Original DSP Viability Appraisal for Wool*	Savills Comments	Savills Cost estimates	
				S106	Other major cost
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS: £1,500 / unit @ 466 units = £699,000	Calculation should be based on actual cost of acquiring 32.7 ha of land which is agreed SANG provision. From range of possible costs, could use £30,000/ha which is the 'bare minimum for testing' stated by Inspector for Poole CIL Examination (17 Jan 2019). Maintenance cost is a low first estimate and may increase. SANG establishment/set up costs could also be additional and are TBC.		981000 25000
Heathland mitigation		Does not appear	Heathland SAMM COST IS S106. Assume no care home contribution. £375 per house; £255 per flat; - assume 75% houses (353 houses).	162210	
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000	No contribution likely to be required once site allocation of 36 hectares and SANG area of 17 hectares of agricultural fields taken into consideration (balance of 15.7 hectares of SANG is woodland and not relevant)	0	
Fields in trust play requirements	TBC	Play equipment £100,000	On site provision Note developer will pay for provision of equipment and factor in to purchase price; management company will maintain and charge residents	0	
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291	This should be run on more like 400 units to be a more robust figure	2464400	
Travel plan for new residential development	S106 - £10,000 (with a ?)	£10,000	Too low - we estimate a coordinator would be £80,000 (3 years)	80000	
Site related highways improvements	No entry	£200,000	Based on: Two bus stops on site frontage to Dorchester Road @ £10,000 each = £20,000; pedestrian pavement widening on East Burton Road = £250,000-£300,000; widening of south side of A352 between Baileys Drove and Colliers Lane to accommodate cycles=£10,000	330000	
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC				
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bare Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC		Based on: Improvements at station: 7 elec vehicle charging points @ £5,000 = £35,000; Other improvements for station: £20,000 (undefined); Signage on A351 c. £11,250.	66250	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000	Policy wording now states on site provision is desirable not necessary and would be a development cost in any event; Station provision calculated above already, Innovation Park not our concern.	0	
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280	No longer needed	0	
New request post Reg 19: contribution to existing community facilities (parish hall)	No entry	No entry	Broad estimate, further discussion is ongoing to refine, hence likely to change.	250000	

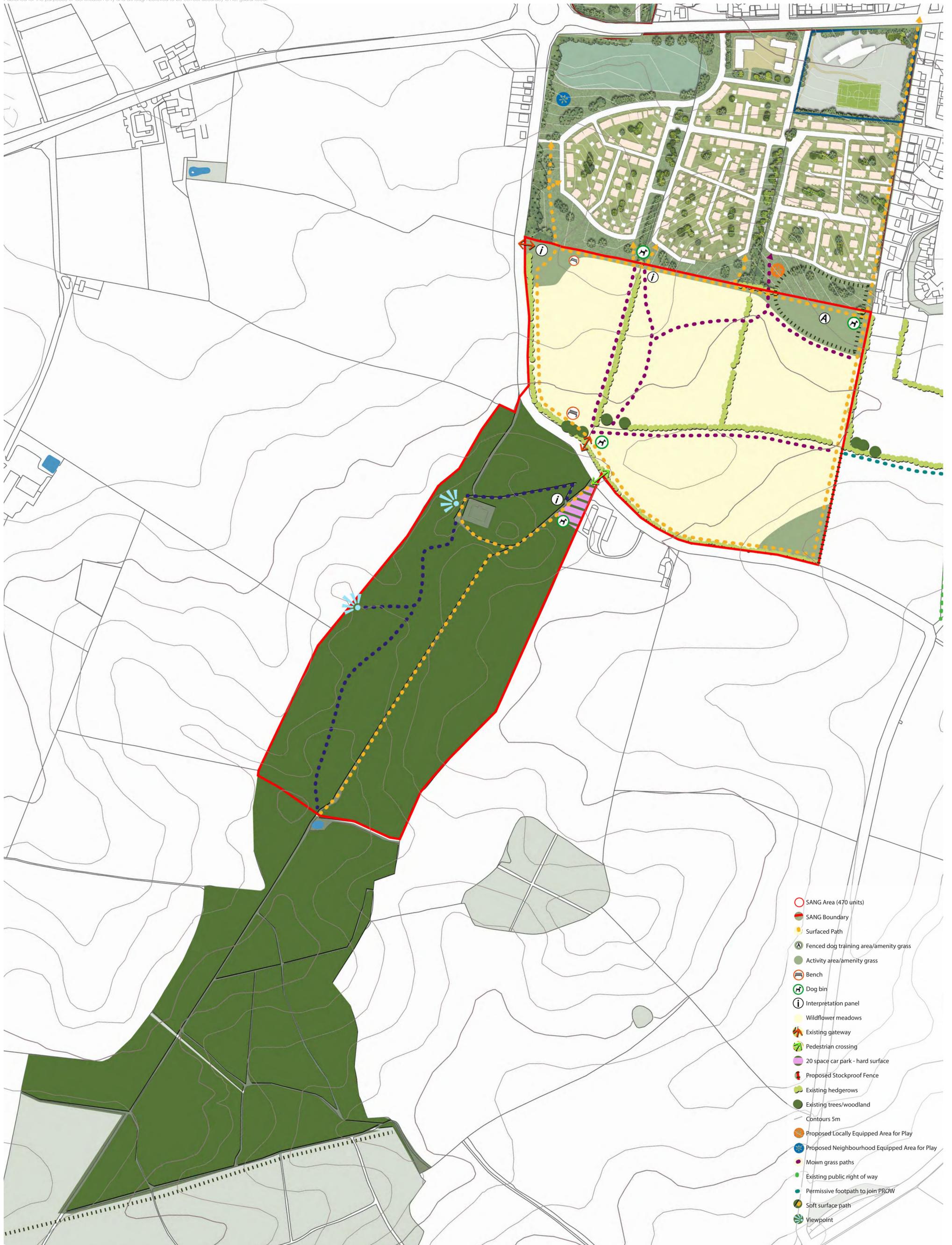
TOTALS

£3,618,571

£3,352,860
£4,358,860

£1,006,000

Appendix 3 – SANG concept plan



- SANG Area (470 units)
- SANG Boundary
- Surfaced Path
- A Fenced dog training area/amenity grass
- Activity area/amenity grass
- Bench
- Dog bin
- i Interpretation panel
- Wildflower meadows
- Existing gateway
- Pedestrian crossing
- 20 space car park - hard surface
- Proposed Stockproof Fence
- Existing hedgerows
- Existing trees/woodland
- Contours 5m
- Proposed Locally Equipped Area for Play
- Proposed Neighbourhood Equipped Area for Play
- Mown grass paths
- Existing public right of way
- Permissive footpath to join PROW
- Soft surface path
- Viewpoint

Copyright Savills (UK). No dimensions are to be scaled from this drawing. All dimensions to be checked on site. Area measurements for indicative purposes only.

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project | Wool - Suitable Accessible Natural Greenspace (SANG)
 client | Weld Estate
 date | 22/05/2019
 drawn by | VT
 checked by | RB

drawing | Proposed SANG
 job no. | WIP262769
 drawing no. | 5004
 rev | -

scale | 1:5000@A1



**PURBECK LOCAL PLAN
MATTER E: HOUSING -
HEARING STATEMENT**

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

- 1.1 A & F Baggs and Bellway Homes Limited (Bellway) have not provided comments on all of the questions in relation the housing allocations. The following responses focus on those questions considered relevant to the promotion of land to the West of Wareham, which was initially a preferred allocation in the Local Plan but has subsequently been overlooked in favour of alternative sites without proper assessment or justification.

Q1. (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?

- 1.2 Particular concern has been raised with regard to the lack of consideration of land West of Wareham as a reasonable alternative in our Matter D Hearing Statement, so those points are repeated here, with the focus on the soundness of the allocations, in particular policy H4.
- 1.3 However, it is worth reiterating that A & F Baggs and Bellway's view is the allocations process is flawed and cannot be considered to be soundly based as it has failed to properly consider the comparative merits of allocating additional land at Wareham, which is one of the most sustainable locations for growth in the District.
- 1.4 A & F Baggs and Bellway have concerns with regard to the soundness of the allocation at Moreton Station / Redbridge Pit, which is the largest allocation of land in the Local Plan at 490 units, equating to approximately 30% of the required land to be found by the LPA. This allocation is made despite Moreton Station sitting below Wareham in the settlement hierarchy. The settlement is currently classified under 'Other Villages with a Settlement Boundary' (see Policy LD in Purbeck Local Plan Part 1, November 2012) , with limited availability of local services. The 2019 Local Plan raises the hierarchy of the settlement to 'key service village', seemingly only on the basis of the additional housing that it proposes.
- 1.5 Land at Moreton Station/Redbridge Pit is close to Crossways, outside the District, which has a number of local facilities, but is still only a small village. However, aside from requiring payments to enhance existing offsite local facilities, which are somewhat disconnected from the site, policy H4 does little to enhance service provision in the area, which in our view would be essential for the site to be considered sustainable.
- 1.6 Whilst the policy sets out that the allocation is for 490 dwellings plus community facilities and supporting infrastructure, there are no specific requirements for onsite provision which means that the site will be developed with limited facilities and will become a car dependant dormitory housing estate, from where residents are bound to travel significant distances to settlements such as Dorchester, Weymouth, Poole and Bournemouth, for day to day services, including shopping and work. This is not a sustainable solution.
- 1.7 This is acknowledged in the Council's own evidence (SD50, Page 38) where the initial SA of options identified negative sustainability impacts with regards to a) access to basic services and facilities and reducing the need to travel b) protecting and enhancing habitats, species and

geodiversity and c) minimising all forms of pollution and consumption of natural resources (a significant negative). In each of these categories, land West of Wareham was assessed as being more sustainable – significantly so in relation to access to services and facilities.

- 1.8 Whilst the allocation is therefore not justified by the Council's own evidence, it is also non-compliant with NPPF Section 9 'Promoting Sustainable Transport' (Paragraph 103), which states:
- "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*
- 1.9 Moreton Station's lack of key services, including an upper school and significant employment and leisure opportunities, means that it fails to comply with the intention of national transport planning policy guidance, which is to limit the need to travel.
- 1.10 While Moreton Station has a rail station, it is a minor station; for example, there is a reduced service of one train per hour each way between 8am and 8pm Monday to Friday (unlike Wareham, Dorchester and Poole stations, which have two trains per hour).
- 1.11 Car travel towards larger settlements (Dorchester to the West, and Wareham/ Poole/ Bournemouth to the East) requires residents to drive on minor roads for much of the journey, some of which include single-track sections (options include 3.4 miles via B3390 via Warmwell, 5 miles via West Stafford, or 4.9 miles via East Burton Road). Bus travel options are also limited and the policy does not require services to be enhanced, which will further exacerbate use of private cars.
- 1.12 As covered in our Matter D Hearing Statement, major development would more appropriately be focused on larger, more sustainable settlements in the district, including Wareham.
- 1.13 By way of comparison, land West of Wareham, which has not been properly assessed other than in the initial SA where it scored well, would provide good access to Wareham town centre, ensuring compliance with NPPF Paragraph 85; good transport links, including an accessible rail station and good access to the strategic highway network, and an abundance of key local services (including lower and upper schools, supermarkets, leisure centre), ensuring compliance with chapter 9 of the NPPF.
- 1.14 The site also has the ability to deliver a large area of Suitable Alternative Green Space (SANG) which would be more than sufficient to mitigate against adverse impacts of the development on European protected sites and be an asset for the wider area. Any issues with the connectivity of this site could be dealt with through detailed design.
- 1.15 Whilst land West of Wareham is in the AONB, if Moreton Station is considered to be the most sustainable option for development the LPA can find, it must be considered that there is a case for exceptional circumstances and the consideration of development on land which currently has not been given due consideration.
- 1.16 The benefits of developing in Wareham instead of Moreton Station clearly outweigh any perceived negative impacts on the qualities of the AONB, which we have shown can be mitigated (see our Regulation 19 consultation response).
- 1.17 If a proper assessment of alternatives is considered, it is our view that land West of Wareham will be viewed favourably and would replace Moreton Station as an allocation for 490 homes.

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?

- 1.18 A & F Baggs and Bellway are unclear of the process for identifying those sites proposed for allocation, particularly in relation to those sites ruled out of the assessment process.
- 1.19 The Site Assessment Paper, January 2018 (SD54) sets out that land West of Wareham has been ruled out as there are '*no exceptional circumstances for development in the AONB*' (page 33). In the conclusion, reference is made to the AONB Background Paper, 2018. We are not aware that this Paper forms part of the evidence base for the Plan as it does not appear to be on the Council webpage as a submission document nor was it available at Regulation 19 stage. This is a serious flaw in the transparency of the assessment process which undermines the justification for the approach.
- 1.20 As set out in our regulation 19 consultation response, A & F Baggs and Bellway refute the conclusion that there are no exceptional circumstances for considering development in the AONB. A simple blanket exclusion on considering development in the AONB does not reflect the fact that over 60% of the District is in the AONB and significantly, that the AONB covers the more sustainable towns in the District, including Wareham.
- 1.21 To allow a robust and balanced assessment of the Sites, each potential site in the AONB should have been considered on its merits with AONB noted as a constraint. Only once this process had been undertaken can the balance between the potential harm to the AONB in the particular location of the site and the benefits of allocating land in the AONB be balanced against the possible alternative solutions. To not include an assessment of AONB sites (particularly given the sustainability benefits of developing land West of Wareham identified in the initial SA of Options (SD50)) means there is no proper justification of the allocations when considered against reasonable alternatives.
- 1.22 As set out in our Matter D Hearing Statement, there appears to be no rationale for the Policy V1 which sets out the land allocations which will be made as part of the 'vision' for Purbeck. The strategy includes four new allocations at Moreton Station (490 homes), Wool (470 homes) Lytchett Matravers (150 homes) and Upton (90 homes). The policy also clarifies that the proposed Neighbourhood Plan allocations in Wareham (200 homes on allocated sites plus 100 windfall) and in Bere Regis (105 homes) form part of the overall strategy to meet identified housing need.

Issue 2: Housing Land Supply (Policy H2)

Q1. Is the distribution of housing as set out in policy H2 (The housing land supply) consistent with the overall spatial strategy?

- 1.23 A & F Baggs and Bellway do not have any specific comment on the distribution of housing in policy H2 as it relates to the strategy set out in policy V1 – the Overall Spatial Strategy. However, they do not consider that the distribution of housing to be consistent with the role of the ‘Towns’ as set out in the Settlement Hierarchy included in the Glossary of the Local Plan.
- 1.24 For the Plan to be effective, the role of those settlements identified as being the most sustainable locations should be the focus of growth. The current distribution of housing does not reflect the important role that Wareham plays as a focus of services and facilities for the District.

Q4. 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)?

- 1.25 The Council’s Housing Background Paper (October 2018) at Paragraph 104 states that a maximum number of 49 windfall homes should be considered as part of the Council’s land supply position in the Local Plan. However, evidence in Figure 2 of the same document shows a clear decline in the number of windfall homes delivered in the area over the previous 10 years, and should this trend continue, it is possible that this figure may not be reached.
- 1.26 It is noted that the LPA refers to the reduced trend of windfall since 2014 as a ‘temporary dip’, however 4 years is a sufficiently significant period to consider this a more permanent trend.
- 1.27 The plan currently appears to assume that approximately 60 dwellings per year will be completed as windfall/small sites. This is above the LPA’s maximum suggested figure of 49 units per annum, which is on a downward trend, which is the only evidence available.
- 1.28 Given the downward trend in completions, A & F Baggs and Bellway suggest there is no compelling evidence that the level of completions assumed will be completed the that additional land needs to be allocated to fill the gap that is likely to be created by under delivery over the plan period.
- 1.29 In addition, It appears that the historic windfall figures since 2014, upon which the figure of 49 units per annum is based, include windfall development in Wareham. However, as the Wareham Neighbourhood Plan assumes separately that 100 of its 300 allocated dwellings will be delivered through windfall, Wareham’s windfall should also be excluded from historic windfall figures, if these are to be used to infer a future trend for the rest of the district. This would reduce the historic levels of windfall development further.

Q6. How has flexibility been provided in terms of the potential supply of housing land?

- 1.30 As noted in relation to Matter D, A & F Baggs and Bellway do not consider that sufficient consideration has been given to the need for a contingency buffer to ensure that the housing requirement, which should be seen as a minimum, is delivered over the Plan period.
- 1.31 The Plan should ensure that the housing requirement can be met on both an annual basis (to satisfy the five-year land supply requirements) and also over the whole plan period. The former of these requires a good mix of sites to ensure that annual delivery rates are not stunted by one specific site being stalled.
- 1.32 Delivery over the Plan period necessitates an over-allocation of land to allow for uncertainty in delivery. It is suggested an appropriate allowance would be at least 10% of the housing requirement (270 dwellings). We are aware that higher buffers (c.20%) can be justified when it is considered that there is inherent uncertainty with the delivery of sites, as we have raised with land at Moreton Station.
- 1.33 To be effective, additional land allocations need to be made in the Plan by way of modification. A & F Baggs and Bellway consider allocation of land at Wareham, specifically to the west of the town, is the most appropriate location for any additional allocation to be made.

Issue 4: Other housing policies (Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15).

Q10. (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?

- 1.34 As drafted, the policy proposed that all new housing within the AONB will be restricted in perpetuity to ensure that new homes are occupied as a principal residence. This approach is not justified by the evidence base presented by the LPA.
- 1.35 The justification set out in the Second Homes Evidence Paper is that second home ownership levels are between 7.3% (based on Council Tax data) and 8.69% (based on Electoral Roll Data), which is above the regional average of 6.6% and the national average of 4.4%.
- 1.36 A & F Baggs and Bellway consider that these levels are not significantly out of kilter with the regional average (0.7% difference, or 1 additional home in every 143), so the policy is a disproportionate response to the issue.
- 1.37 While the policy may be justifiable for individual dwellings or small windfall development, or for particular areas such as Studland or Chaldon Herring, where the evidence indicates second home ownership is significantly above the regional average, it is not justified in areas such as Wareham, where second home ownership is below the national average or where major development is proposed. This would include land West of Wareham, this be included as an allocation if the plan as a main modification.
- 1.38 It is therefore recommended that the policy be deleted or modified to focus on preventing second home ownership on smaller windfall development in those locations where second home ownership is an issue, which is likely to be those traditional villages nearest to the coast. Without such a modification the policy is not justified.

EXAMINATION OF THE PURBECK LOCAL PLAN
FURTHER STATEMENTS ON MATTER E - HOUSING
MORETON ESTATE
JUNE 2019



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ROURKE

1.0 Issue 1: Housing allocations

Q1. (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?

(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?

- 1.1 The Moreton Estate considers that a robust approach has been used in the assessment of sites for allocation and that the Moreton Station / Redbridge Pit allocation is soundly based.

Q2. 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))?

- 1.2 The Housing Background Paper (January 2019) identifies a requirement for specialist housing to cater for the ageing population and predicted increases in the number of Purbeck residents with dementia and mobility issues. The graph in appendix 1 illustrates the predicted rise in the population of over 65s in Purbeck over the local plan period¹, with the number of people aged 85 and over anticipated to almost double.
- 1.3 Given the ageing population and the findings of the SHMA, it is considered reasonable to assume that the need for care will rise within the district during the local plan period and the allocation of land at Moreton Station / Redbridge Pit for a 65 bed care home is considered to be entirely reasonable, appropriate and justified.

Q4. Are the assumptions regarding capacity of each of the allocations justified and based on available evidence?

- 1.4 The Moreton Station / Redbridge Pit site extends to just over 44 hectares. Whilst detailed master planning needs to be undertaken, Moreton Estate's advisors drew up a concept master plan for discussion with Natural England in 2016 (see agreed memorandum of understanding) which showed 14.31 hectares of land as being available for housing, 0.66 hectares of land for a care home and a further 18.89

¹ Source: Department for Communities and Local Government Household Projections model (2014-based)

hectares of land available for the SANG. The remaining land was shown as comprising green infrastructure, roads and drainage basins.

- 1.5 Based on these figures, if 14.31 hectares of developable land is developed for housing at an average density of 35 dwellings per hectare – which is not unreasonable given the site's proximity to a railway station and the NPPF requirement to make effective use of land - then the site's capacity would be 500 dwellings plus a care home.
- 1.6 Based on these figures, Moreton Estate considers that the allocation of up to 490 homes and a 65 bed care home is evidenced-based and appropriate.

Q5. Is there robust evidence that the development of the allocations is viable and deliverable?

- 1.7 Due to the need to fully restore the quarry before development can commence, the Moreton Station / Redbridge Pit allocation is scheduled to be developed in years 6 to 10 of the plan. With regard to paragraph 67 of the NPPF (February 2019) and the definitions of 'deliverable' and 'developable' in the glossary, the Moreton Station / Redbridge Pit site is clearly a developable site, occupying a suitable location for housing development with a reasonable prospect that it will be available and could be viably developed at the point envisaged.
- 1.8 Nevertheless, the allocation has been the subject of a high level viability assessment undertaken by the Dixon Searle Partnership in October 2018. Whilst this assessment demonstrates that the site's development is viable, based on advice received from Tangent Surveyors, Moreton Estate has expressed concerns about some of the assumptions used.
- 1.9 Currently, there is no robust evidence available to demonstrate that the delivery of the allocation is not viable or undeliverable. However, on the basis of preliminary viability appraisal work undertaken by Tangent Surveyors and discussed with Purbeck Council, Moreton Estate considers it:
 - highly likely that the residual land values at the site will be lower than reported by the Dixon Searle Partnership
 - unlikely that the site's development would be able to deliver all of the infrastructure required by the plan as well as 40% housing, and still deliver an acceptable benchmarked residual land value to Moreton Estate
 - likely that a future planning application for development at the site will need to be accompanied by a viability assessment (as allowed for under policy H4), once the site has been master planned and the cost of infrastructure provision and sales values in the area at that time, have been updated.

Q6. (a) What are the assumptions about the scale and timing of supply and the rates of delivery?

(b) Are the assumptions realistic?

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

- 1.10 Due to the need to fully restore the quarry before development can commence, the Moreton Station / Redbridge Pit allocation is scheduled to be developed in years 6 to 10 of the plan. This is reflected in the council's housing trajectory.
- 1.11 Moreton Estate considers that a build out rate of 50 dwellings per annum (assuming two developers are on site at the same time) over 10 years is a realistic trajectory for the delivery of the Moreton Station / Redbridge Pit allocation. If only one developer is present, then delivery rates are likely to be lower at around 25-30 units per annum.

Q7. (a) Are the policy criteria set out in the relevant policies justified and effective?

(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?

- 1.12 Yes, the criteria set out in policy H4 are considered to be justified and effective.
- 1.13 The change to policy H4 identified as MM6 in SD14 Schedule of Possible Modifications is essential for the policy to be effective. This is because Moreton Estate does not control land at the station / travel interchange and does not have any legal ability to physically provide any of the improvements required by the policy.

Q8. (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?

- 1.14 The area identified for the SANG at the Moreton Station / Redbridge Pit allocation largely comprises an attractive area of woodland together with a series of ponds immediately adjacent to the proposed residential development, making it an excellent starting point for the creation of a SANG. The suitability of this land for a SANG was discussed and agreed with Natural England, Dorset Wildlife Trust and Purbeck District Council back in 2016. Although the woodland area will need to be enlarged, purposefully designed and laid out in order to ensure that it meets Natural England's design criteria for SANGs, there is no evidence to suggest that it is not capable of being delivered or that it would not be successful once available for use.

Q10. 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?

1.15 Paragraph 16 of the NPPF sets out a series of requirements for development plans, as follows.

(a) be prepared with the objective of contribution to the achievement of sustainable development

1.16 Moreton Estate considers that policy H4 complies with this requirement. The allocated site contains a small amount of previously developed land and will productively utilise a former quarry rather than virgin greenfield land. The allocated site is well located for encouraging the uptake of sustainable travel, being close to the railway station and within walking and cycling distance of a public house at Moreton Station and primary school, health surgery and other community facilities in Crossways. The site's development is very unlikely to generate severe traffic impacts and clear opportunities exist to create an attractive SANG to mitigate impacts on internationally important heathland areas, deliver a nitrogen neutral development and enhance biodiversity.

(b) be prepared positively, in a way that is aspirational but deliverable;

1.17 Policy H4 of the plan has been positively prepared and aspires to deliver a high quality sustainable development that makes best use of the site's location adjacent to a mainline railway station and its existing quality of environment.

1.18 Although Moreton Estate has expressed concerns about the viability assessment of the site's allocation undertaken by the council's appointed consultants, the site is not scheduled to be developed within the first five years of the plan, so there is clearly time available to master plan the site and ensure that the site is deliverable in viability within years 6 to 10 of the plan.

(c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

1.19 Purbeck District Council has consulted widely and on several occasions about options for development within the district prior to the publication of the submission draft local plan, so this requirement has been satisfied.

(d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

1.20 Subject to the amendments proposed by MM6 in SD14 Schedule of Possible Modifications for Purbeck Local Plan, Moreton Estate considers that the policy complies with this requirement.

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

- 1.21 Moreton Estate considers that policy H4 complies with the requirements of paragraph 16 (e) and (f) of the NPPF.

2.0 Issue 4: Other housing policies (Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15).

Q1. (a) Are the specific requirements of policy H3 (New housing development requirements) justified, effective, likely to be viable and consistent with national policy?

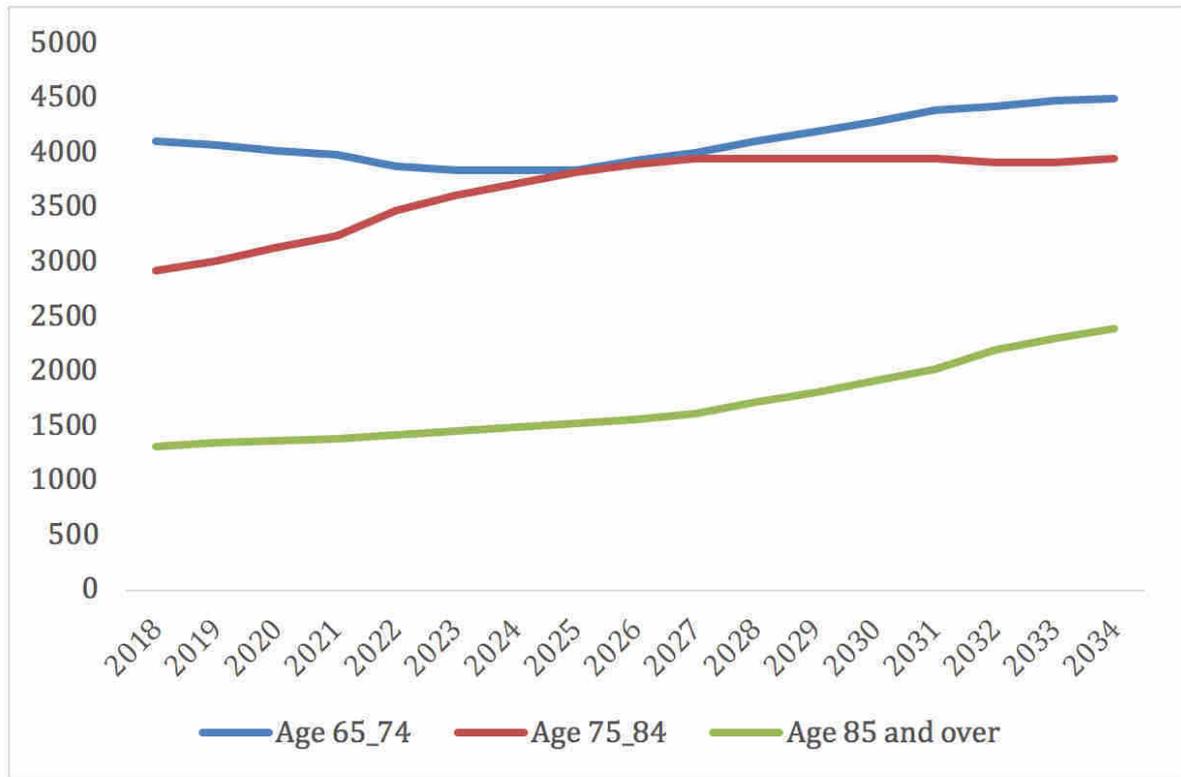
(b) Is the change to the policy (MM5) indicated in the schedule of possible modifications [SD14] necessary for the Plan to be sound?

- 2.1 Moreton Estate does not object to the list of requirements in policy H3 and is supportive of MM5 and MM16 set out in SD14 Schedule of Possible Modifications for Purbeck Local Plan.

Q7. 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?

- 2.2 Paragraph: 002 Reference ID: 10-002-20190509 of the planning practice guidance states that *“Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.”*
- 2.3 Moreton Estate has expressed a number of concerns about the viability assessment of the Moreton Station / Redbridge Pit allocation undertaken by the Dixon Searle Partnership. Although the site is not due to be developed until years 6 to 10 of the plan, at this moment in time, Moreton Estate considers it unlikely that the site would be able to deliver all of the infrastructure required by the plan as well as 40% housing, and still deliver an acceptable benchmarked residual land value.
- 2.4 At this moment in time, it is likely that a future planning application for development at the site will need to be accompanied by a viability assessment (which is allowed for under policies H4 and H11), once the site has been master planned and the cost of infrastructure provision and sales values in the area at that time, have been updated.

Appendix 1



Graph showing the predicted rise in people aged 65 and over in Purbeck over the plan period according to government forecasts

The Retirement Housing Consortium

Examination of the Purbeck Local Plan

This is a joint representation made on behalf of Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living (referred to in the representations as “The Consortium”).

We are a group of independent and competing housebuilders specialising in sheltered housing for the elderly. Together as a group, we are responsible for delivering circa 90% of England’s specialist owner occupied retirement housing.

These representations are made in respect of the **Hearing Matter E: Housing and our comments relate chiefly to Issue 4 of this matter.**

Issue 4: Other housing policies (Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15). We have only responded to questions related to the delivery of specialist accommodation for older people.

Q1.

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

Some of the requirements would be unsuitable for schemes of specialist accommodation for older people.

This policy should be amended to ensure older peoples’ housing proposals have a flexible requirement with contributions to open green space, playing fields and education contributions.

This policy requires all residential development to contribute towards Recreation and Open Space Facilities. Picking up on the Community Infrastructure Levy Regulations 2010, which with the inclusion of paragraph 122(2) states;

A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

This is now a legal requirement as opposed to previous policy guidance meaning that any planning obligations have to be 'necessary' to make the consent lawful. Unfortunately, the use of such a wide-reaching tariff to cover all types of residential including specialist retirement housing would fail the "necessary" test as well as contributions not being calculated in a fair and reasonable way relating in scale and kind to the nature of my Client's specialist residential developments for older people.

It is assumed that specialist retirement housing would be exempt from elements of the contributions towards the provision of recreation and open space facilities where there is limited or no direct relevance or mitigation to be addressed. This perhaps needs to be clarified further in the policy. The need for play areas and open space elements would clearly not be directly relevant to specialist accommodation for older people and yet may be treated the same as say a 4-bedroom house.

Specialist housing for the elderly by its very nature does not accommodate children and in so doing the contributions related to infrastructure for children does not meet the test of the Community Infrastructure Levy Regulations 2010, paragraph 122(2).

We note that contributions will be sought to mitigate the effects of residential development on Recreation, sports and leisure in an area. McCarthy and Stone's Retirement Living developments are aimed at the elderly. Residents of such developments tend to be on average 79 years old and suffer from lower mobility. Consequently, the cumulative impact on sports and recreation facilities arising from residents in such developments would be less than that of family or 'general needs housing'.

Seeking development contributions from older persons housing developments at a fixed rate does not therefore 'fairly and reasonably relate in scale and kind to the proposed development'.

On this basis we request that the requirement to seek contributions for play areas, schools, education and open space elements is either:

- A) Reduced to reflect lower cumulative impact on the facilities arising from these forms of development, or,
- B) Decided on a case by case basis with developer contributions mitigating the impact on facilities likely to be impacted by older persons housing.

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

N/A

(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?

No. This policy should be amended to ensure older peoples' housing proposals have a flexible requirement with contributions to open green space, playing fields and education contributions.

Q5.

(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?

Paragraphs 153 and 154 *Specialist Accommodation for an ageing population* highlights the need to plan and provide for the housing needs of Purbeck's ageing population. Paragraph 154 concludes:

Ensuring housing delivery responds to this demographic shift is key to the overall success of the Purbeck Local Plan.

However, beyond a requirement for a proportion of housing in sites coming forward being provided for older people, there is no policy presumption in favour of, or encouragement for this form of development. Retirement Housing is generally delivered by small developments exclusively designed to meet the needs of older people. They may form part of a wider development but more often are delivered on centrally located urban brownfield sites of usually less than 0.5 hectares.

Additionally, whilst there is an acknowledged need to provide more housing specifically designed for older people, there are many barriers to its delivery. Good sites for such development are increasingly difficult to find and different economic and viability considerations apply to mainstream housing including generally higher acquisition costs, build costs, slower sales rates and the need to provide non saleable communal areas.

The National Planning Practice Guidance includes guidance for assessing housing need in the plan making process entitled ***“How should the needs for all types of housing be addressed?”*** (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for ***“Housing for older people”***. This stipulates that *“the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important”* (My emphasis).

There is therefore a need and growing requirement to include policies directly aimed at encouraging retirement housing. Policy H9 does not do this.

(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?

N/A

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

No. therefore we would respectfully suggest the following modification.

We would advocate that the Council take a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population. We would like to highlight the advice provide in the *Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit*. This toolkit was developed by a consortium of private and public organisations with an interest in housing for the elderly and encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided

“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the ‘Lifetime Homes’ standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.

The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”

Q6.

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

No.

The policy as drafted states that “residential development must ensure that” that it complies with the standards proposed.

The application of Building Regulations Requirements M4(2) and M4(3) is very detailed and should not be a matter for development management but rather for the Building Regulations at site development stage.

That said, particularly on small constrained sites, typically as found in the small towns and villages Purbeck, and which may be proposed for development by SME's or Specialist housing developers, it may not be possible to meet requirement in any case because of the nature of the site and/or the development proposed.

In this respect, the NPPG guides:

Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. There may be rare instances where an individual's needs are not met by the wheelchair accessible optional requirement –

Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied.

(emphasis added)

Paragraph: 008 Reference ID: 56-008-20160519

Therefore in order to provide an effective framework for development management, if a Policy were to be pursued in the plan, rather than providing inflexible prescription as is currently proposed it should guide the Development Management team as to whether the application of any policy requirements (if justified) is appropriate given the circumstances of the site and the development concerned.

(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?

No. Please see comment in relation to part a of question 6.

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

No. Please see comment in relation to part a of question 6.

Q7. 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?

As evidenced by our previous submissions, the Policy as drafted would therefore not be effective in addressing the housing needs of older people as it would inhibit the ability of developers to deliver and in its proposed application of the same policies for affordable housing does not recognise the priority needs to be addressed.

As stated in our previous representations, there is significant concern that the Evidence Base upon which the Policy is justified is flawed and misguided. A separate submission is made in this regard as attached to this Representation which shows that this type of accommodation is unable to provide more than a contribution in line with 10% affordable housing provision.

It is therefore strongly recommended that the All Plan Viability Assessment is reviewed, and the outcome of that review be used to inform a revised approach of the Policy which properly reflects the different viability considerations applicable to retirement housing and the sites where it usually comes forward from.

Viability review at application stage

Also in this regard, the proposed policy requires:

Where an applicant considers there are significant economic viability constraints that would prevent the provision of affordable housing in accordance with the policy, they will be required to provide full justification of exceptional circumstances to the Council's satisfaction. Where a viability assessment is required, it should refer back to the viability assessment that informed the plan, providing evidence of what has changed since then.

However, the All Plan Viability Review at least makes clear at Paragraph 3.2.32 that “*The particular nature of a specialist housing scheme would be reviewed when considering any planning application*” thus acknowledging that the viability of such developments needs individual assessment on a site by site and development by development basis.

Provision of affordable housing on site

The Policy also provides that affordable housing is provided on site unless there are “*clear site specific constraints that would impact the economic viability of development*”. It is well established that affordable housing contributions arising from specialised housing for older people are generally delivered by way of an off site financial contribution given (a) the practicalities of mixing affordable housing into a single building scheme with extensive communal facilities and the need for those facilities to be paid for through a service charge (b) priority needs may be better met off site. The Policy as drafted refers to only “*economic viability*” considerations as pertinent in this regard. This needs to be rectified.

Suggested Modification

- 1. That the All Plan Viability Assessment is reviewed and the outcome of that review be used to inform a revised approach of the Policy that recognises the viability considerations of specialised housing for older people**
- 2. That in accordance with the Viability Review, the Policy includes reference to the fact that specialised housing for older people will usually be expected to be subject to a Viability review during the planning application process**
- 3. That the Policy be amended to read**

Affordable housing provision required as part of Purbeck Local Plan site allocations will be provided on site without exception. In any other circumstance, the payment of a commuted sum for delivery of affordable homes off-site, to a value equivalent to on-site provision, will only be agreed where there are clear site specific constraints that would impact the economic viability of development or where the proposal provides specialised housing for older people.

Hearing Statement: Purbeck Local Plan (2018-2034) (June 2019)

Matter E – Housing

Introduction

1. This Statement has been prepared by Origin3 on behalf of Halsall Homes, specifically in relation to their land interests at Steppingstones, Stoborough. These Representations follow those made by Halsall in response to the Purbeck Local Plan – Issues and Options consultation during March 2015, the Options consultation during August 2016, the New Homes for Purbeck Consultation during January 2018 and the pre-submission draft of the Purbeck Local Plan during December 2018.

Issue 2: Housing Land Supply (Policy H2)

Q.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?

2. The introduction of a new permissive small sites policy is supported in-principle. As noted with the evidence base documents¹, the Intelligent Plans and Examination (IPE) review undertaken for Purbeck District Council advises that there is a clear need to boost housing delivery in the Purbeck District over the next two to three years. The IPE Review suggests that the Council should consider the early release of sites where there are no overriding infrastructure requirements.
3. Policy H8 introduces much needed flexibility into local planning policy in Purbeck District to enable the Local Plan to be responsive to changing needs and requirements and for Purbeck to meet its' objectively assessed housing need of 168 dwellings per year.

¹ SD03 Habitats Regulation Assessment – Footprint Ecology – September 2018

4. There is a demonstrable need for both market and affordable housing within Purbeck District. The Purbeck Local Plan (Part 1) which currently provides the overarching planning policy context for the District was found 'sound' on the basis of a partial review, to address the fact that the plan was not meeting the required housing growth. The partial review was to commence in 2013 with adoption in 2017. The Inspector's report into the Purbeck Local Plan (Part 1) reported "*this is a short term expedient approach and because the District will continue to be under pressure for additional housing (a need that is likely to increase) it is imperative that the early review is undertaken*".
5. Purbeck District have therefore been planning for an insufficient amount of housing land for a number of years, including 2 years where a revised housing requirement should have been in place. Furthermore, the current distribution strategy for housing growth set out in the Purbeck Local Plan (Part 1) lacks direction and or specific site allocations for the lower order settlements. The Purbeck Local Plan (Part 1) Monitoring Report (August 2017) provides the Council's latest position on housing completions and commitments broken down into the districts five 'spatial areas', subsequent monitoring reports are no set out in this way and so this is the most up-to-date evidence for completions and commitments by spatial area.
6. In the adopted Local Plan, the 'Central Purbeck' spatial area which covers the parish of Arne is identified to deliver 475 dwellings over the plan period. The 2017 annual monitoring report referenced above, notes that as of March 2017, 65% of the overall target of 475 had been met. It should be noted however that the allocated site at Worgret Road which has now been built out, received planning permission for less dwellings than it had been allocated for and therefore scope remains for a further provision of 47 dwellings as allocated within the PLP1 settlement extension at Wareham but, there are no specific sites available for development and delivery within the plan period is uncertain. The key point is that there is a history of under delivery in the District.
7. The residual housing requirement of the 'Central Purbeck' spatial area (275 dwellings) was identified to be delivered as windfall development. At the time the annual monitoring report was prepared, there remained circa 120 dwellings to be delivered when moving into the last third of the plan's plan period. National planning policy guidance is clear that strategic policies should identify a sufficient supply and mix of sites, including small and medium sized sites which can make an important contribution to meeting housing requirements.

8. Given the lack of growth direction and positive identification of housing sites through the current adopted local plan, it is imperative that the emerging Local Plan provides a mechanism and opportunity for lower order settlements such as Stoborough to organically grow to meet future housing needs.
9. Consultation on the Purbeck Local Plan under the New Homes for Purbeck consultation (January 2018) has shown that public opinion favours a more dispersed distribution growth around the District. The New Homes for Purbeck Sustainability Assessment (SA) considered a range of alternative options for district-wide growth in addition to the small sites policy, such as a more concentrated approach to development and a strategy to remove general planning restrictions allowing for development anywhere. The New Homes for Purbeck Sustainability Assessment (SA) found that the proposed small sites policy scored well against the SA objectives. It is considered that the small sites policy is the most appropriate and suitable strategy when considered against these alternatives.
10. Policy H8 provides the opportunity to enhance the sustainability of smaller settlements enabling organic growth and providing small scale, deliverable housing opportunities without overriding infrastructure requirements. Inherently, there are a number of delivery issues and limitations with a housing strategy which relies upon large allocations and or a high concentration of sites in limited locations. Larger development sites usually take longer to deliver due to planning timescales, lead in times and infrastructure delivery. There are also economic delivery issues with a high concentration of sites in a limited number of locations such as build out and market sales rates.
11. Spreading the number of new homes across the District can help to limit the impact on existing infrastructure arising from large concentrations of new homes in specific areas. Whilst the identification and allocation of specific sites through the local plan process provides a degree of greater certainty and confidence in delivery (along with planned infrastructure provision), it is acknowledged that the small sites policy provides flexibility through its permissive approach allowing development to be justified through the development management process.
12. It is recognised at a national level that greater diversity is required in the housing market and that opportunities for SMEs, through for example the provision of small sites will enable quicker delivery of much needed local housing. Larger allocations take longer to deliver because of the associated infrastructure

requirements². The small sites policy will allow the organic growth of Purbeck's smaller settlements at a scale which supports the vitality of these existing communities and their services and facilities. The small sites policy would also provide diversity in the housing supply which in turn would result in better opportunities for small and medium sized developers, supporting the creation of jobs and sustaining local growth. This approach is clearly in line with the NPPF, paras 77 and 78 which recognise the need to provide for rural housing.

13. Stoborough is identified as a 'Local Service Village' in the settlement hierarchy, the Local Plan Review sets out that 'Local Service Villages' are locations that would be expected to take some growth, in order to sustain vital rural services.
14. There are a range of key services in Stoborough, which include a shop, a pub, a recreation ground, a village hall and a primary school and illustrate the sustainable nature of the settlement, hence its role in the hierarchy. Stoborough Church of England Primary School has a capacity of 210 pupils. It is understood that the current number of pupils on roll is 202³. New housing growth at Stoborough can therefore help support and sustain the vitality of the school. Additional housing growth at Stoborough can also offer a number of other benefits including creating and supporting a more balanced community through delivering a range of types of accommodation.
15. Wareham is located circa 1.2km from the site at Steppingstones, Stoborough where access to a wider range of services, facilities and employment opportunities is available. The route along the B3075 includes a paved footway. The suggested acceptable walking distance in Providing for Journeys on Foot (IHT, 2000) is around 1200m. The figure advocated in Manual for Streets (HMSO, 2007) is a maximum walking distance of 2 kilometres. The proximity of Stoborough to Wareham, and its accessibility therefore raises the sustainability credentials of Stoborough and supports it as a sustainable and appropriate location for further growth.
16. Despite the special opportunities for development on rural exception sites, there are often few incentives for landowners to release land solely for affordable housing due to viability concerns. The application of Policy H8 in conjunction with Policy H11 offers the opportunity for the provision of on-site affordable

² DCLG, Fixing our Broken Housing Market, 2017

³ <https://get-information-schools.service.gov.uk>

housing to be delivered on schemes over 10 units, this would provide a valuable source of affordable housing in a District where the provision of such housing is seen as a “*major priority*”⁴ because average house prices are inaccessible to the local population and “*some people cannot access appropriate homes, even those classed as affordable*”⁵. The provision of affordable housing is a major priority for Purbeck District Council and the small sites policy provides an opportunity for affordable housing delivery in locations where limited new housing growth and affordable housing delivery has occurred in recent times.

17. There is a clear need for affordable housing within Arne Parish as demonstrated by the housing need study commissioned by Purbeck District Council in April 2014. The Housing Needs survey showed 17 households as being eligible for affordable housing. It is prudent to note however that housing need surveys offer only a snap-shot in time. It is essential that the housing stock within the Parish continually evolves to respond to changing need and to keep up with demand, which is likely to have risen owing to the lack of recent housing delivery within the Parish.
18. Halsall Homes are promoting land at Steppingstones, Stoborough for residential development. The application of the small sites policy provides an opportunity to meet the parish-wide identified housing need, supports the overall housing requirement of the District and also contributes to the affordable housing stock for the District.
19. To promote the development of a good mix of sites, the NPPF at paragraph 68 requires local planning authorities to (inter-alia) identify, through the Development Plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Purbeck Local Plan has not sought to identify and allocate specific small scale development sites, through the provision of the small sites policy, it supports the development of windfall sites through a flexible permissive approach. In this regard, the small sites policy can therefore be considered to meet the objectives of paragraph 68 of the NPPF.

Issue 4: Other Housing Policies

Q.4(a) Are the specific requirement of policy H8 justified?

⁴ Para 161 of Purbeck Submission Local Plan (January 2019)

⁵ Para 161 of Purbeck Submission Local Plan (January 2019)

20. Policy H8 permits applications for new build residential development next to existing settlements, subject to the three guiding policy requirements listed.
 21. Criterion 'a' seeks to set an upper limit of homes that will be permitted on small sites to 30 dwellings. This appears a rather arbitrary limitation on development which is not underpinned by an evidential basis. It is recommended that the policy should reflect the fact that each potentially suitable site is different and should be considered on its merits and on a case-by-case basis.
 22. A more justified approach, which would better relate to the range of settlements to which Policy H8 is applicable would be the inclusion of a criterion to support development where it is commensurate with the scale and character of the settlement and which delivers new growth sustainably, especially at lower order settlements, having regard to their accessibility to key services and facilities. A good example would be Policy SS2 in South Somerset District. This approach allows greater growth in the larger, more sustainable settlements which have the infrastructure to enable that level of growth, whilst enabling small-scale development in the smaller settlements.
 23. We are also aware of a further permissive small sites policy, CS32 (Service Villages) in the adopted North Somerset Core Strategy (January 2017). Here, the guiding policy requirements ensure sites which come forward *"enhance the overall sustainability of the settlement"* and *"can be readily assimilated into the village"* and *"have regard to the size, type, tenure and range of housing that is required"*.
- (b) Does the policy sufficiently provide for the cumulative impact of homes on small sites to be considered?***
24. As noted above, Policy H8 permits small sites next to existing settlements, subject to three guiding policy requirements.
 25. Criterion 'b' sets out that *"individually and cumulatively, the size, appearance and layout of proposed homes must not harm the character and value of any landscape or settlements potentially affected by the proposals."*
 26. This criterion along with the application of other relevant development management policies which also require the decision-maker to have regard to the cumulative impacts of development on such matters as

landscape, provides a mechanism whereby the cumulative impact of homes on small sites can be sufficiently considered.

27. We are aware of provisions within the Dorset Heathlands SPD which require large sites of approximately 50 or more dwellings to provide for a Suitable Alternative Natural Greenspace (SANG) to mitigate the recreational and urban pressures on the protected heathlands. For small scale development, the Dorset Heathland SPD proposes an approach of strategic mitigation based on Heathland Infrastructure Projects and Strategic Access Management and Monitoring.
28. Notwithstanding our comments set out in this Statement in respect of the imposition of a maximum site cap for Policy H8, policies which contain thresholds can throw up inconsistencies from time to time. For example it is possible that two schemes could come forward in the same place at the same time which if approved would cumulatively deliver 50+ dwellings and therefore trigger the need for a SANG by virtue of their combined scale. This is a practical problem for the planning authority to deal with in their development management decisions, and it should also be recognised that project level Habitats Regulation Assessment (HRA) will be required.

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

29. The wording of the locational requirement of the policy is considered to be too restrictive in that sites must be "adjacent to existing homes". There may be instances where suitable sites are adjacent to other land uses for example employment or community uses which would arguable not benefit from this policy as currently drafted. Greater flexibility should be implemented through this policy as to not provide a barrier to sustainable development and growth within the rural areas of the District.
30. It is suggested that "*adjacent to existing homes*" should be revised to "adjacent to the existing built up area (or settlement boundaries where defined)" in order to provide flexibility for sites to come forward which are not directly adjacent to existing homes.
31. The wording 'homes must not harm the character and value of any landscape or settlements' is not supported. This does not account for the benefits of development outweighing adverse impacts. The NPPF

Paragraph 11 tilted balance recommends that adverse impacts must significantly and demonstrably outweigh the benefits for permission to be granted. As currently worded, any harm, however minor, would mean that all development proposal would fail this particular criteria.

32. It is suggested that the wording could therefore be revised to state *"individually and cumulatively, the size, appearance and layout of the proposed homes must not significantly harm the character..."*. Alternatively, the wording of this policy requirement could be positively phased such as *"results in high quality sustainable schemes which is appropriate to its context and makes a positive contribution to the local environment and landscape setting"* as per wording from North Somerset Policy CS32.

Word Count – 2,612

Appendix 1 – SSSDC Policy SS2

POLICY SS2: DEVELOPMENT IN RURAL SETTLEMENTS

Development in Rural Settlements (not Market Towns or Rural Centres) will be strictly controlled and limited to that which:

- Provides employment opportunities appropriate to the scale of the settlement; and/or
- Creates or enhances community facilities and services to serve the settlement; and/or
- Meets identified housing need, particularly for affordable housing.

Development will be permitted where it is commensurate with the scale and character of the settlement, provides for one or more of the types of development above, and increases the sustainability of a settlement in general.

Proposals should be consistent with relevant community led plans, and should generally have the support of the local community following robust engagement and consultation.

Proposals for housing development should only be permitted in Rural Settlements that have access to two or more key services listed at Paragraph 5.41.

Delivery

- 5.47 The following delivery bodies will be key in implementing Policy SS2:
- South Somerset District Council;
 - Town and Parish Councils;
 - Developers and Landowners; and
 - Registered Providers.

Monitoring Indicator	Target
Net additional dwellings in Rural Settlements.	At least 2,242 dwellings built in Rural Settlements over the local plan period.
Housing developments in Rural Settlements.	New dwellings only permitted in Rural Settlements with two or more key services.
Level of community facilities or services in Rural Settlements (Rural Services Survey).	Addition of new community facilities and services in association with development.
Delivery of employment in Rural Settlements.	Approximately 1181 jobs to be delivered over the local plan period.

Appendix 2 – North Somerset Core Strategy Policy CS32

North Somerset Council **Core Strategy** January 2017

Area policies

CS32: Service villages

New development within or adjoining the settlement boundaries of the Service Villages of Backwell, Banwell, Churchill, Congresbury, Easton-in-Gordano/Pill, Long Ashton, Winscombe, Wrington and Yatton which enhances the overall sustainability of the settlement will be supported where:

- It results in a form, design and scale of development which is high quality, respects and enhances the local character, contributes to place making and the reinforcement of local distinctiveness, and can be readily assimilated into the village;
- It has regard to the size, type, tenure and range of housing that is required;
- It will not cause significant adverse impacts on services and infrastructure and the local infrastructure is sufficient to accommodate the demands of the development
- It results in high quality sustainable schemes which is appropriate to its context and makes a positive contribution to the local environment and landscape setting;
- It does not result in significant adverse cumulative impacts (such as highway impacts) likely to arise from existing and proposed development within the wider area;
- The location of development maximises opportunities to reduce the need to travel and encourages active travel modes and public transport; and
- It demonstrates safe and attractive pedestrian routes to facilities within the settlement within reasonable walking distance.

Sites outside the settlement boundaries in excess of about 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans.

This policy contributes towards achieving Priority Objective 3, 6, 7, 8, 9, and 10.

CS32



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Examination of the Purbeck Local Plan

Further statements based on Inspector's Matters, Issues and Questions

Submitted on behalf of Anthony Hazell (ID 1188986)

MATTER E: Housing

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Issue 2: Housing Land Supply (Policy H2)

Q2. (a) What is the relationship between policy H8 (Small sites next to existing settlements) and the principle of policy H12 (Rural exception sites)?

1. There does not seem to be a clear relationship or consideration of strategy between the two policies. This becomes clear when the answer to Q2(b) is considered.

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

2. The following table helps identify the main differences and similarities. From this, it would appear likely that, because of the enhanced viability of allowing much more open market housing on Policy H8, together with the lack of any requirement to consider the presence of sustainable modes of transport (walking, cycling and public transport) to access jobs, services and facilities, the inclusion of both policies will clearly disadvantage the provision of affordable housing through rural exception sites.

3. The only settlements where the provision of affordable housing through rural exception sites could be favoured (where Policy H8 small sites would be precluded) is on sites that would not be regarded as 'infill' within villages in the Green Belt, and at the very smallest settlements that are not listed (and therefore are considered the least sustainable). However it is likely that in many

cases these opportunities could still be ruled out by the application of the sustainable transport criterion in Policy H12.

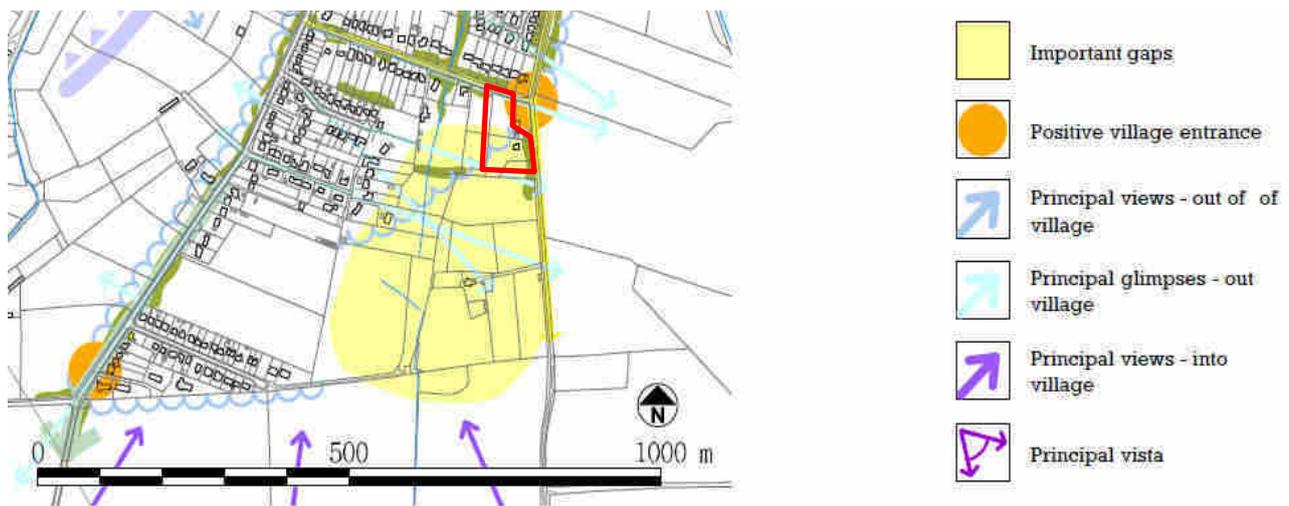
	H8 (Small sites next to settlements)	H12 (Rural exception sites)
Locations where the policy applies	<p>Town or village defined in the settlement hierarchy i.e. <u>Towns</u>: Swanage, Upton and Wareham <u>Key Service Villages</u>: Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford, Redbridge Pit / Moreton Station and Wool <u>Local Service Villages</u>: Langton Matravers, Stoborough, West Lulworth and Winfrith Newburgh <u>Other Villages with a Settlement Boundary</u>: Briantspuddle, Chaldon Herring, Church Knowle, East Burton, East Lulworth, Harmans Cross, Kimmeridge, Kingston, Lytchett Minster, Studland, Ridge and Worth Matravers Other Villages without a Settlement Boundary: Affpuddle, Bloxworth, Coombe Keynes, East Knighton, East Stoke, Holton Heath, Morden (East and West), Moreton, Organford and Worgret</p>	<p>All settlements except in the parishes of Swanage, Wareham and Upton Settlement is undefined in the glossary, nor is it defined in the NPPF According to the Braintree judgement ([2018] EWCA Civ 610 Case No: C1/2017/3292), <i>"a settlement would not necessarily exclude a hamlet or a cluster of dwellings, without, for example, a shop or post office of its own, or a school or community hall or a public house nearby, or public transport within easy reach. Whether, in a particular case, a group of dwellings constitutes a settlement, or a "village", for the purposes of the policy will again be a matter of fact and planning judgment for the decision-maker"</i></p>
Additional locational criteria	<p>Must not harm the character and value of any landscape or settlements Within the green belt, only limited infilling, on sites positioned directly in-between existing buildings, within and around the edges of towns and villages will be permitted</p>	<p>There is an opportunity to use sustainable modes of transport (walking, cycling and public transport) to access jobs, services and facilities, unless the applicant can demonstrate that there are no other suitable alternatives in the parish for addressing local need</p>
Size of site allowed	<p>Maximum of 30 homes</p>	<p>Should reflect community needs, the size of the village it most closely relates to, available infrastructure and services and the character of the surrounding area. <i>A recent appeal decision in relation to Langton Matravers (ref 3162354 dated 28 March 2017) allowed a rural exception site for a development of 28 dwellings (22 affordable and 6 open market).</i></p>
Housing mix sought	<p>A mix of different types and sizes of homes to reflect the Council's expectations in Policy H9 – specific requirements for self-build (5%) and single storey (10%) on applies to sites of 20 or more homes. Under Policy H11 affordable housing provision (at 30 or 40%) would be provided on-site for all sites of 10 or more homes, and a commuted sum (at 20%) sought from sites of between 2 and 9 homes.</p>	<p>Provided it is demonstrated as being necessary to enable the provision of significant additional affordable housing to meet local needs, some open market housing may be allowed. At least 70% of the homes would be affordable homes.</p>

4. As raised in our response to the pre-submission draft, Policy H8 effectively opens up the potential for sites such as land off Deans Drove in Lytchett Matravers to be developed. The site was refused in February 2018 as a rural affordable housing exception site. There was

considerable debate at the committee (in light of the officers recommendation for approval) and objectors highlighted many issues and problems with this site, including:

- Poor access to employment and facilities - the transport report submitted with the application itself highlighted a number of shortcomings with the site's location and access, the main two being that most (9 out of 13) village facilities were beyond the standard 800m walking distance of the site, and that pedestrians may have to step off the carriageway onto the grass verges of Deans Drove due to traffic (which would not be possible for more vulnerable users in wheelchairs and pushchairs etc).
- The availability of more preferable alternative sites (as evidenced through the SHLAA) that had not been considered (see map that follows).
- Harm to the Green Belt and an important gap (as noted in the District Council's own adopted guidance - see diagram that follows).
- Due to the topography and proposed layout there was little reasonable prospect for effective landscape screening to be provided that could mitigate overlooking into and from the adjoining residential property of The Fold.
- The necessity for significant work to the supply and waste services to avoid increased flood risk, including upgrades to the foul sewage pumping station and emergency storage and upsizing works further downstream, which (because of the limited landownership) would also harm a protected tree (TPO)

5. The townscape appraisal undertaken by Matrix Partnership on behalf of the District Council makes clear that Deans Drive is a tranquil, rural lane, and part of an important gap (as shown in Fig 5.1, reproduced below). The appraisal considers that there is no potential for development within this area.



6. The officers advised the committee to keep the reasons for refusal simple, and as such the reason given was that the proposed development did not comply with Purbeck Local Plan Part 1 Policy RES as the site is not within close proximity to, and is not served by sustainable transport providing access to local employment opportunities, shops, services and community facilities.

7. The map below shows the relationship between the Dean's Drove site and community facilities, and how there were many alternative sites (the adopted Local Plan site allocation, likely infill (windfall) element at the reservoir site and the preferred SHLAA sites to the north-east), at

that time that were all within or on the outer bounds of easy walking distance¹ to the main facilities within the village and the only (small) employment area and would (or could) provide the affordable housing needed.

8. It is therefore of great concern that this sustainability factor is not proposed to apply equally to open market as it would to affordable housing provision.

9. As per our response to the pre-submission consultation, we would suggest Policy H8 is DELETED, or if it is to be retained, include further criteria along the following lines:

“(d) there is an opportunity to use sustainable modes of transport (walking, cycling and public transport) to access jobs, services and facilities;

(e) there are no other adverse impacts identified that would outweigh the local need for housing;

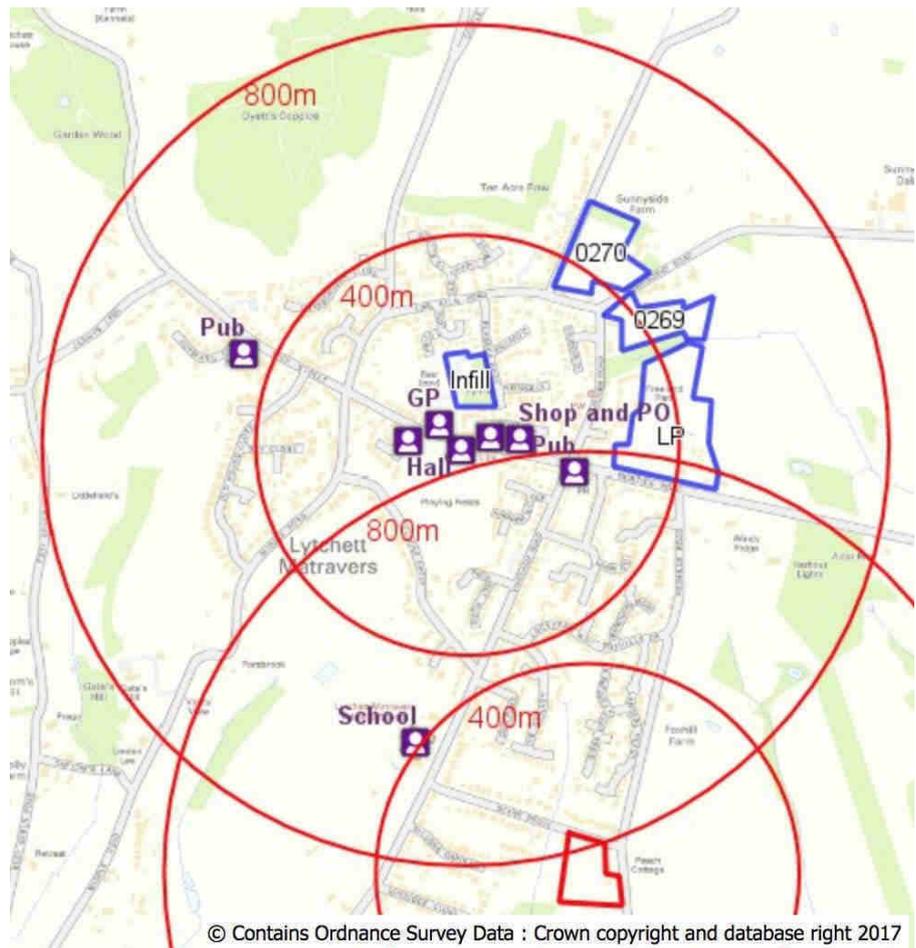
(f) the site does not lie within a Neighbourhood Plan area where small sites have or are proposed to be allocated to meet identified housing needs.”

Our response to Q4(c) also suggests a further change in respect of Green Belt.

Q4. (b) Does the policy sufficiently provide for the cumulative impact of homes on small sites to be considered?

10. The Council suggest that there could be 250 homes (17 dwellings per annum, which they are intending to include in their calculation of their 5 year housing land supply) when there is no clear basis for such a limit and their SHLAA has already identified twice this number of homes as possible (and the policy is not limited to SHLAA sites).

11. There appears to be no realistic consideration of the cumulative impact on these sites other than a reference to the cumulative landscape impact under criterion (b). This has no bearing on the cumulative impacts of travel patterns that the developments could give rise to or the capacity of existing infrastructure such as schools, healthcare facilities etc. This is not effective planning, and goes against the ethos of a plan-led system advocated in para 15 of the NPPF.



¹ Based on 400m / 5 minutes which is the generally accepted as 'easy walking distance', with 800m / 10 minutes considered the upper accepted limit for journeys to be undertaken on foot, depending on the terrain and safety of the routes.

12. Whilst the Council cite that there was general support for this policy (64%) it is clear from the responses from the Parish Councils that there were strong concerns regarding the upper limit and cumulative impacts of this policy and the uncertainty in the absence of which sites could come forward.

Q4. (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?

13. The NPPF refers specifically to "limited infilling in villages" within the Green Belt as being an exception to what would otherwise be inappropriate development. There is no reference to towns (and therefore the reference to the towns should be omitted from this element of the policy).

14. There is no definition in the NPPF in terms of what either 'limited' or 'infilling' should be construed, but it is clear that the original wording of Policy H8 stretches the definition of this if it could be applied to a site for 30 houses, and could potentially include farmland and paddocks with open land to one or more sides. This is not rectified by the proposed modification.

15. Whilst Poole (which shares the same Green Belt boundary) has recently updated its Local Plan, it does not include a similar policy on infill presumably because it lacks any villages that are washed over by Green Belt. Looking further afield, other local planning authorities have adopted a much stricter definition of infill than that proposed. For example, the Kirklees Local Plan², which was adopted in February 2019, clarifies

*19.31 National planning guidance states that new dwellings may not be inappropriate in the Green Belt where they constitute limited infilling within villages. There are a number of smaller settlements in Kirklees which are either overwashed by the Green Belt or inset within it and the level of services contained within these settlements varies considerably. Any application for infill development within the Green Belt will therefore be judged in the first instance on whether the settlement is a village for the purposes of Green Belt policy. **If it is established that the site is within a village the plot should be small, normally sufficient for not more than two dwellings and within an otherwise continuously built up frontage.***

16. Another example is the Wycombe Local Plan³ (the version now being examined and which has reached main modifications change pending the Inspector's report) use the following definition:

*6.214 Limited infilling is defined as **at most one detached or one pair of semidetached dwellings in an existing small gap** between other buildings in the built-up area, and only where the siting would also be appropriate with regards to settlement pattern and the grain and morphology of the village. To be limited infilling **the plot must be comparable in size and shape to the average house plots in the village** (excluding any that are atypically large or small). The proposed building must be similarly comparable in size and scale (again, excluding outliers). This is assessed on the size of the building proposed (not the size of each dwelling) to allow flexibility for smaller pairs of semi-detached houses as infilling in areas of larger detached housing (or vice versa). **Suitable infilling plots can be created by the subdivision of larger residential gardens (or other previously developed land) but not by the artificial sub-***

² <https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-strategy-and-policies.pdf>

³ <https://www.wycombe.gov.uk/pages/Planning-and-building-control/New-local-plan/New-local-plan-examination-supporting-evidence.aspx#Submissiondocuments>

division of agricultural fields, or paddocks, or similar land that has not been previously developed, where this is likely to result in incrementalism.

17. It is clear that these examples which meet the 2018/2019 NPPF requirements consider limited to a small number of dwellings, and the extent of variation from this that could be allowed if criterion (a) is used as the basis for the decision, is creating a significant variation from how National policy has been applied elsewhere without reasoned justification

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

18. For the reasons given above in response to questions Q2(b) and Q4(c), the wording of policy H8 is not sufficiently clear to avoid potential ambiguity that could arise.

19. We would therefore suggest Policy H8 is DELETED, or if it is to be retained, includes further criteria and amendment to the Green Belt reference along the following lines:

“(d) there is an opportunity to use sustainable modes of transport (walking, cycling and public transport) to access jobs, services and facilities;

(e) there are no other adverse impacts identified that would outweigh the local need for housing;

(f) the site does not lie within a Neighbourhood Plan area where small sites have or are proposed to be allocated to meet identified housing needs.

Where proposals would be within the green belt, only limited infilling of generally no more than one or two dwellings, on plots not artificially created by the sub-division of agricultural fields, or paddocks, and only where positioned directly in-between existing buildings, within a village listed under 'settlement hierarchy' in the glossary of the Purbeck Local Plan will be permitted..”

Q8. Is policy H12 (Rural exception sites) justified, effective and consistent with national policy?

20. As highlighted in our previous response, it is important that substantial weight is given to any harm to the Green Belt (in line with NPPF para 144) and as such this test should be included (albeit that the test of very special circumstances does not apply). It is therefore suggested that the policy is amended by the inclusion of a further criteria along the following lines:

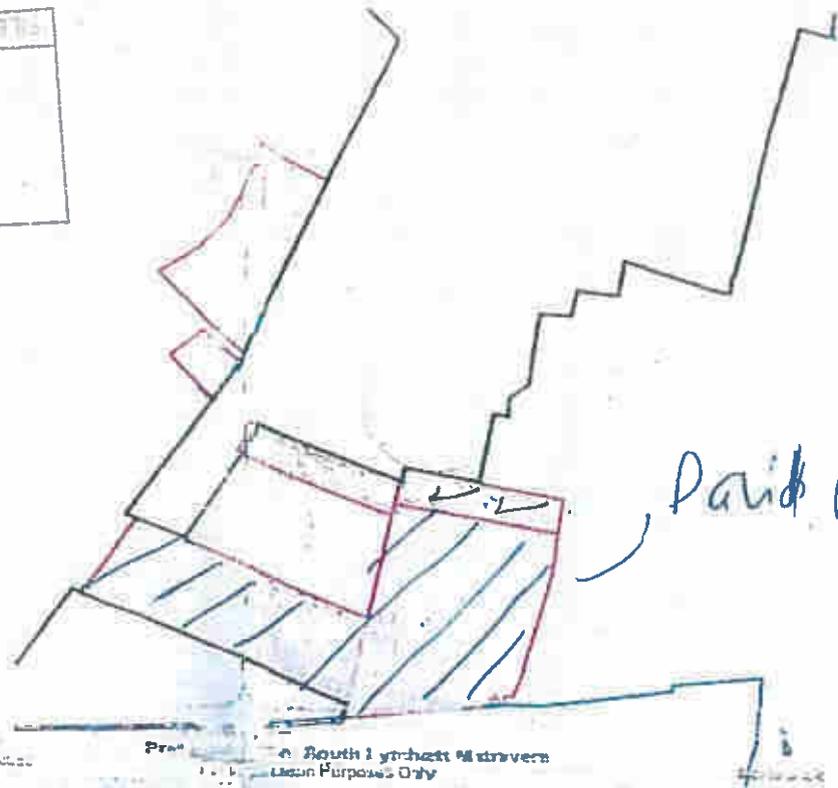
“(e) the development would not harm the function or integrity of the Green Belt”

Preferred Options

23 MAY 2019

Legend

-  Residential
-  Commercial
-  Public Open Space



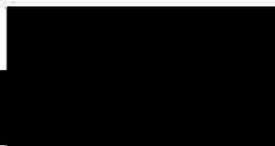
South Lytchett Matravers

The Council's preferred option is for around 90 homes in north east Lytchett Matravers and around 240 in the south, which totals 330 homes in this location.

Policy LD (General Location of Development) of the PLP1 categorises Lytchett Matravers as a key service village. This policy aims to direct development towards towns as the most sustainable settlements in the district in the first instance. However, it would not be possible to meet the district's housing needs in this larger settlement group. Lytchett Matravers is the district's largest village and lies in close proximity to the Poole / Bournemouth conurbation. It is a sustainable location to develop. It is surrounded by green belt, but the Council's green belt review has identified that the preferred sites would not harm the purposes of this designation.



Pool



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BY EMAIL ONLY

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Dear Ms Doward,

Purbeck Local Plan (2018 – 2034)

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

Natural England submit the following comments/advice concerning the Purbeck Local Plan for consideration at the Examination in Public.

Matter E, Issue 4

Draft Poole Harbour Recreation SPD

Natural England has been working closely with the authority and the former Borough of Poole to secure a suitable strategic mitigation approach which will allow new housing to come forward within the agreed area where pressures have been shown to arise. This approach is similar to the heathland and nutrient SPDs in as much as it enables small development which would not individually be able to provide mitigation to come forward by making a contribution to a strategy which delivers the necessary avoidance/mitigation measures. The SPD has been consulted on prior to the Local Government Review and Natural England have been advised that both authorities intend to adopt it as and when their own decision making arrangements are established. Interim arrangements are in place for the small number of developments commencing in this period.

The Local Plan should be modified such that suitable references are made within policy and the following site allocations. Natural England has agreed with the promoter and authority the requirement in Statements of Common Ground for the Upton (H7), Lytchett Matravers (H8). The proposed revision to the Green Belt at Wareham to facilitate the Neighbourhood Plan will also lead to allocated developments to which the SOD will apply. It appears that the most suitable place for a modification would be at H3 see below.

Policy H3, the overarching Housing policy, reference is made at c) and d) to heathland and nutrient mitigation requirements. An additional point should be inserted to make reference to the need to secure appropriate mitigation measures to avoid additional recreational pressure on Poole Harbour SPA and Ramsar. This is consistent with the policy approach of ensuring that applicants are fully aware of the scope of requirements and matters requiring to be addressed.

Natural England has advised the applicant in its Pre-submission comments that this policy should make full and clear reference (at point L) to the need to avoid biodiversity losses and to secure biodiversity Net Gain in accordance with NPPF (175 d). Currently as the bridging policy it is not compliant with the NPPF.

Natural England is concerned that Policy 3 – dealing with allocated sites does not therefore have

weight over policies H12-15 which deal with other housing provision and has advised a cross reference on the supporting text to the requirements of Policy E8 and E9 to avoid uncertainty to applicants. This should be addressed in supporting text as these requirements can have significant impacts on these smaller developments and early engagement with the authority can help to avoid or resolve the matters.

Natural England would anticipate reaching an agreement with the authority over suitable wording modification for consideration at the examination.

Matter E issue 4

Policy H8 Small sites

Natural England concerns are set out in the Pre-submission consultation advice. The authority has proposed the modification below.

Monitor the number and spatial distribution of homes permitted ~~on~~ **through the** small sites **policy** to ascertain whether the cumulative impacts of development are likely to have significant effects on European sites that would require mitigation.

Natural England's concern relates to additional residential developments in the 400m to 5km area where a development (in other respects acceptable) subsequent to a completed development is unable alone to deliver mitigation eg a Heathland Infrastructure Project which could have been delivered were both projects to have come forward in a planned manner. The threshold for requiring a SANG for example is 50 dwellings. This policy could constrain developments in nearby settlements which are both in close proximity to a particular part of the designated sites.

Matter F, Issue 1

Policy E9 Poole Harbour

This policy required a minor modification as the Borough of Poole is now Bournemouth Christchurch and Poole (BCP) . The policy should be reworded as the authority has now consulted over an SPD and it should be shortly be adopted. Suggested wording adjustments are below:

The Council and BCP have carried out a consultation on a Recreation in Poole Harbour SPD which will be adopted in time for the Local Plan. Development proposals for any net increase in homes, tourist accommodation or a tourist attraction around the edges of the harbour (as defined in the SPD) will need to avoid or mitigate adverse impacts arising from recreational activity on Poole Harbour.

Natural England would anticipate reaching an agreement with the authority over suitable wording modification for consideration at the examination

Policy E10 Biodiversity and geodiversity

Natural England has made detailed comments concerning the preceding paragraphs to ensure suitable reference should be made to two protocols established by the Dorset Council. This will assist developers as well as the authority in properly applying the requirements of the NPPF regarding moving from biodiversity loss to an overall net gain. Further the authority is advised to make use of the work funded by the Local Enterprise Partnership and delivered through the Local Nature Partnership which defines and makes publicly available the Dorset Ecological Network and potential Ecological Network plans. These will facilitate applicants in formulating proposals which are consistent with the Governments policy on Biodiversity Net Gain and a Nature Recovery Network. Natural England advise that with suitable modifications to supporting text the plan will be in conformity with government policy advice.

Matter G

Modifications MM9 and MM10 are welcomed by Natural England as is the assumed adjustment to

the Policy plan for the development area.

Matter H

Policy I1,

The authority developed the Local plan prior to Local Government Review and is now part of a larger authority. Natural England is aware of proposed modifications to the CII Regulations and also to other mechanisms such as Unilateral Agreements and the use of S111 agreements to secure mitigation in the case of proposals taking advantage of permitted development adjustments etc. Natural England advise that the Inspector should ask the authority to consider if the list of mechanisms in the policy represents in any way a restriction on enabling developments. For example the insertion of the word "including" would add flexibility to the authority.

I trust this advice will be of assistance.

Yours sincerely

Nick Squirrell
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