

Further comments – Matters A – E

Date	Consultee No	Name
03/09/19	1187806	Mr Andrew Wilson
03/09/19	1190735	West Lulworth PC/Mr Jon Davey
04/09/19	1189783	Wool PC/Ms Jacqui Hughes
05/09/19	1191181	Dudsbury Homes/Mr Simon Trueick
05/09/19	1190180	The Charborough Estate/Mr James Cleary
06/09/19	1188067	Welbeck Land/Mr Peter Canavan
09/09/19	996484	Home Builders Federation Ltd/Ms Sue Green
09/09/19	1191014	The Rempstone Estate/Mr Martin Miller
09/09/19	1190963	The Lulworth Estate/Mr Cliff Lane
09/09/19	1188328	Wareham Neighbourhood Plan Steering Group/Dr David Evans
09/09/19	1188470	Moreton PC/Mr Nigel Hill
09/09/19	1191476, 1191015, 1190535	Residents of Glebe Road/Mr Alan Bagley, Mrs Mandy Backhouse, Ms Naomi Pickard
09/09/19	1191125	Bellway Homes Ltd & AF Baggs/Mr Mark Harris
09/09/19	1191253	Catesby Estates/Mr David Neame
09/09/19	1190247	Bloor Homes Southern/Mr Andrew Elliott
09/09/19	1191908	Dr Andrew Langley
09/09/19	1191135	Halsall Homes/Mr Alex Cave
09/09/19	1191250	Lytchett Matravers PC/Mr Alf Bush
10/09/19	1190024	Wyatt Homes (Upton & Lytchett Matravers)/Mr Peter Home
10/09/19	1192742	Retirement Housing Consortium/Ms Carla Fulgoni
10/09/19	1191219	Westcoast Purbeck Ltd/Mr Adam Bennett
06/09/19	1189887	Ms Clare Lees – updated to webpage on 01/10/19

Submission from Andrew Wilson – Person ID No. 1187806

Continued Examination of the Purbeck Local Plan

FAO Ms B Doward – Inspector

In this submission, I have quoted from relevant sections of the Addenda and Amendments, and then added my submission in red for greater clarity.

Ref: SD92: Addendum to Sustainability Appraisal 2019 [SD02]

Wool Baseline assessment

96. Wool is a key service village in Purbeck with a population of 5,761, only marginally less than Wareham. It has the lowest population of over 65s and the highest of under 65s. I would wish to point out that 'Wool' actually consists as a parish of Wool, Bovington and East Stoke. Is becoming apparent that Dorset Council Planning Officers are making use of very selective data and geographical inexactitude in order to justify some of the statistics.

The facilities at Wool are suitable for the size of the area including two primary schools, [Whilst there are actually *three* primary schools within the whole area (another example of DC's inability to be accurate) all three of them are now, in effect and following a recent OFSTED report on one of them, academies – and therefore no longer under DC control and therefore cannot be included as such] convenience stores and independent shops. On a main route, Wool has excellent access to the strategic road network and a train station though buses are infrequent. (Non-existent during the winter months...) 39.9% of Wool's residents own 2 or more cars and only 12% of residents do not own a car. This is fairly average for Purbeck.

If this is extrapolated to include the proposed extra houses, if 40% of the new houses generate 2 or more cars, that is a minimum of approximately 400 extra cars – and yet there is no acknowledgement of possible traffic congestion/pollution etc. and no specific infrastructure provision.

Furthermore, in previous reports and plans it was clearly stated that if there was traffic congestion stretching from the level crossing back to the C6 roundabout on a regular basis that this would 'trigger' the building of a bypass. This congestion *does* occur – several times a day at current levels of traffic – but it must be remembered that the plans to build a bypass were cancelled at least two years ago (in spite of PDC implying that a bypass could still be considered... knowing perfectly well when the statement was made that it had been cancelled). The only mitigation for traffic congestion that is offered within the plan is to ask motorists to seek alternative routes.

97. Just over half of the residents own their home here and there is a large variety of detached, semi-detached and terraced properties. Crime rates peaked in August of 2018 but have shown a downward trend ever since. It is one of the more popular places for people on the housing register and average house prices are moderate in comparison with the rest of Purbeck with very similar costs to Wareham and Sandford. This avoids the issue of which bands on the Housing Register are being considered. The statement implies that Wool is one of the more popular places by people who simply wish to move/relocate, possibly even from out of area. Again, it should be noted that it is very apparent that the numbers of houses being proposed are clearly vastly in excess of those that are actually needed according to

the Housing Needs Register. Unfortunately, it is yet another example of the way NEED is interpreted – clearly financial need of the developer is considered to be far more important than **actual** need for locally affordable houses for local people.

98. Though there are small pockets of biodiversity to take into account, including ancient woodland, this is replanted ancient woodland [how can ‘ancient woodland’ be ‘replanted’ – another example of double-speak...] and the effects on biodiversity can be mitigated for. The AONB lies to the south of Wool. The old town of Wool is a conservation area and there is risk of surface water flooding towards the flood plain. Again, impacts on these aspects can be mitigated for.

It is interesting that reference is made to the old **town** of Wool – Wool is NOT a town. It is referred to elsewhere in this section of the Addenda as a key service VILLAGE... That notwithstanding, no actual evidence is offered with regard to suitable mitigation specific to Wool, or specific to identified problems.

101. Wool has areas at risk of surface water flooding so any further sites would need to provide information on how they would mitigate any potential adverse impacts on Wool. The sites are otherwise relatively unconstrained.

In terms of potential flood risks, I believe that while the proposals have seemingly recognised the principle flood risk is from surface water run-off, I am not convinced that attenuation areas within the plan will be sufficient on their own to mitigate the growing acceptance of climate change. This has been nationally demonstrated recently in examples of extreme rainfall events that would potentially increase surface risk to many historic impoundments built some 200 years ago.

Similarly I believe the vulnerability of existing surface drainage in this village in combination with raised groundwater, including that added by Purbeck Gate, is going to need very careful reconsideration at the planning stage thus ensuring sufficient capacity and later enforcement is correctly applied on those responsible for its maintenance. This includes, developers, landowners (both present and future where tenure changes hands), Network Rail and the local lead flood authority (Dorset Council) who with all the above are all overseen by the Environment Agency. This is a huge issue that while the scope of flood risk is small for Wool (because it is largely above the current natural flood plain of the Frome and Win valleys), any future development is bound to have a proportional impact on surface run-off into these rivers at a point a mere 16m (52ft) above current sea level.

99. Employment types are mainly focussed on public administration and defence, reflecting the proximity to the Dorset Innovation Park and MOD garrison at Bovington.

It should be noted that neither of the locations identified realistically offer employment opportunities to the actual Wool area demographic. It should be pointed out that only a tiny percentage of those currently employed on the DIP site actually live locally. Even if (and it is open to major doubt) the employment opportunities for unskilled/non-technical posts increases, the implication is for even more traffic congestion from commuters. It is also interesting to note that this is yet another example of Dorset Council not giving clarity in terms of definition of what actually constitutes the area of Wool – here, they **include** Bovington because it suits their intention, but they **exclude** Bovington later in terms of EU Designations.

In addition – and in the context of the next section of this document (Wool’s capacity for growth) and referring back to the designation of Wool as a ‘key service village’, it should be noted that the definitive **2012 Spatial Planning Document** produced by **Purbeck District Council** said that:

"the Council has other concerns over the suitability of Wool for strategic housing growth as set out below.

6.1.4 Wool is not at the appropriate level in the settlement hierarchy set out in Policy LD: Location of Development. The RSS omitted reference to Dorset Green Technology Park and its potential in delivering strategic economic growth for Dorset, principally due to the distance from Poole. This lead helped determine the strategy for the delivery of housing set out in the Council’s Development Options report (June 2009), which discounted the option of strategic growth at Wool. Recent housing growth at Purbeck Gate, Wool has not led to any increase in employment growth at Dorset Green despite the aspiration of the Purbeck Local Plan Final Edition 2004. The transport infrastructure would be unlikely to support the potential increase in vehicles and bids for regional funding for a Wool Bypass were unsuccessful. As there is an abundant supply of employment land elsewhere in Purbeck, the delivery of new employment growth at Dorset Green is not essential to the delivery of the Purbeck vision".

One is forced to ask therefore yet again, “What has changed?”

Secondly, It would appear in SD92 that the statistics have been manipulated to give evidence for large scale ‘sustainable’ development in Wool as opposed to other settlements. If nothing else this is an inaccurate document which must be revised to give a proper statistical analysis of the settlements involved.

SD95 Care home provision

5-7 To help plan for appropriate housing, Policy H9provide specialist purpose built accommodation. **This would appear to be *in addition* to the extra care housing proposed** The SHMA does not stipulate the type of specialist care accommodation that should be provided..... Adult social care service supports this flexibility and so Policy H9 does not stipulate the type of care to be provided.....

Policy H9 stated aim above is to provide specialist purpose-built accommodation. However the SHMA does not stipulate the type of specialist care accommodation to be provided. How can purpose-built accommodation be delivered when the type of specialist care is unknown? This policy is left sufficiently vague for the specialist care units not to materialise and for the 94 units for ‘specialist care’ to suddenly become 4/5 bed houses. There is a precedent for this. During the building of Purbeck Gate land was set aside for the new surgery. GPs declined the offer and the Parish Council at the time was keen to see the land set aside for another community use. Barratts put in a planning application for additional housing – it was granted. In addition, this proposal seems to be growing – even though it was never part of the original consultation. It would seem that because there were multiple objections to the sudden appearance of a proposal for a 65 bed care home, this was rapidly changed to become a 65 unit extra care campus. It begs the question of how policy on the type of facility can apparently change overnight – again an example of DC apparently not really having any idea of what they are actually offering, other than doing what the developer tells them, because it is clear from a statement made at the Hearings last month that the would-be developer has already ‘lined up’ a care providing company for this facility.

There is an inherent contradiction however in the amended proposals in that whilst the absolute agreed maximum of houses to be built in Wool was 470, this proposal now adds a further 65 houses – and it would appear that the original care home is still planned for inclusion as well.

I would also wish to reiterate in connection with the proposal for care facilities of any sort various points which I made in my original submission, but which seem to have been completely ignored. In my response dated 01/07/19 I stated:

A further example of the way PDC has attempted to subvert and manipulate the process can be found by the inclusion of a proposal for a 65 bed nursing home to be built in Wool. This is a completely spurious proposal: at no time was there ever any mention in previous consultations of this idea; the only comparable new build nursing home in the area is at Sandford, and it is running at less than half capacity – indicating either lack of demand or lack of affordability. The contempt with which PDC has treated this community is underlined by the fact that the local surgery was not consulted on this proposal, nor was the CCG and nor was NHS Dorset. It also begs the question as to why a nearby nursing home to Wool (in Winfrith) was closed down if there was any actual need for one in Wool.

This is yet another example of the way that additions and revisions to the proposals or consultation documents have been made in mid-consultation or mid-process. Early respondents might well have responded differently had these additions and revisions been in place earlier.

To this original statement I would add that there is a similar ‘campus’ facility that has been built (although opposed by the community there) in Charminster. This has been rapidly shown to be economically unviable, and the ‘extra-care units’ are now being rented to the open market – which is presumably the underlying intention of this proposal anyway.

Policy H5: Wool - Land at Wool as shown on the policies map will help to meet the District's development needs by providing a total of 470 new homes, a 65 bed unit care facility care home, community facilities and supporting infrastructure. The type of care provided will be dependant on the changing needs of older people in Purbeck and in consultation with local health and social care providers.

It is clear that there are already major additions to the 470 allocated houses being considered. There appears to be a contradiction in that DC policy is for an extra care ‘campus’ of 65 units (**in addition** to the 470 houses) but seemingly this is added to by a further 94 place Specialist care accommodation provision. **It is still not clear exactly what is proposed.**

SANG advice to Dorset Council

PP1 Although no mention is made of the SANG for Wool – presumably Natural England consider it suitable despite objections from bodies such as the Woodland Trust.

‘SANGS are part of a package of measures whichinclude off-road bicycle facilities, dog training areas, new and improved parking and access facilities etc.’

If such ‘improvements’ are planned for the Wool SANG they would undoubtedly degrade the existing habitat (an example of the damage of off-road bicycling has been seen in Cole

Wood). Such activities would **not** serve as mitigation – mitigation is required (by regulation) to **enhance** existing habitats and facilities.

Page 3 of Natural England’s letter to PDC – August 2016

Site 18: Amendment of safeguarded employment area at Dorset Green

....the current proposal does not take into account recent botanical survey.....Natural England advise that further work is required to reach an agreement about habitat restoration work proposed.....as well as the biodiversity requirements for the priority present habitats within the Enterprise Zone

Although not directly related to the development or the SANG Mr Squirrell’s statement seems to be at odds with the perceived and stated wisdom from PDC and from Natural England that there are no designations or priority species habitats in Wool. To this should be added the matters raised by a resident of Wool regarding the habitat existence of a colony of Great Crested Newts. It would appear that the proposals which will impact on this GCN breeding colony are directly in breach of regulation on mitigation which requires that mitigation should **enhance** – it is clear that any mitigation provided by the SANG will in no way enhance the current wildlife habitats of species of both flora and fauna throughout Wool. I mention this as a specific example, but I would extrapolate the point to cover the whole area.

SD 97 Summary of key stakeholders issues raised regarding viability of the Local Plan and its policies.

This summary does not appear to include any of the major objections that I know were raised by members of our community. The document (and indeed Dorset Council and the Developers) seems to disregard totally the concept that **members of the Community are Stakeholders** – and yet the clear opinions and the clear opposition of the community to these Planning Proposals has throughout the whole process been completely – in a *de facto* sense – ignored

Comment on SD14 – main modifications

As a continuation of the point above there appears to be nothing in SD14 that mitigates Wool Parish Council’s already submitted comments on the Purbeck Local Plan which was initially in the 2018 consultation to reject all the proposed Options, and latterly in response to the Pre-Submission documentation where strong objections to several areas was raised.

As it would therefore appear that none of the individual or Parish Council recommendations and objections have been incorporated, it suggests that there is now a further need for a full consultation, especially now that the developer has been able to get the ever-compliant Echo to publish their plans – and in the light of the fact that none of the stated wishes of the community have been heard.

SD98 Estimation of likely affordable housing numbers

3. It should however be noted that the application of policies in the local plan will often require part of a house to be delivered. In these instances a financial contribution would be

taken equivalent to the part that cannot be delivered on site. These contributions will then be used to deliver affordable housing elsewhere in the area.

Leaving aside the problems that I have or envisioning 'half a house', clarification is needed here as to what policies in the local plan would lead to the affordable element of housing to be undelivered in the place where it may be needed most. In addition, it should be noted that the Memorandum of Understanding between Savills and the Dorset Council offers the possibility of up to 30% affordable (without of course ever defining whether these houses would be genuinely affordable) - which again demonstrates how the community has been undermined and in essence deceived by the Consultation process, which clearly implied that PDC's policy of 40% - 50% affordable should be encouraged.

The Plan as it stands clearly ignores the actual need for local affordable housing for local people as its driving force. It is clearly predicated on the apparent need for the landowner and the developer to make as much money as possible – hence the 'mission creep' on housing numbers that is being tacitly allowed by Dorset Council within the amendments and addenda.

It was interesting and at the same time concerning to note at the Hearings in August that a representative of the would-be developer openly stated that if Wool had a Neighbourhood Plan in place and that it included a Primary Residency clause (also referred to as 'The St Ives Ruling') it could cause their "plans to stall or fall". This is surely acknowledgement of the long-held suspicion that it is the developer's intention to maximise profits by simply building a dormitory or second-home 'town' which will be of no real benefit to the community. On frequent occasions, Purbeck District Council was pressed to introduced such covenants as part of the Plan – and for these restrictions to be applicable in ALL areas, and not just the AONB. It is now becoming increasingly apparent why they refused to accede to the clearly expressed wishes of the community in this respect.

In conclusion, I would urge the Inspector to reject the Plan – whether in its original or amended or tweaked or fiddled-with stare – as being totally unsound. I would further hope that the Inspector would recommend that there needs to be a further FULL consultation in which the truth of these proposals is made clear to respondents. I would finally hope that the Inspector gives due credence to the clearly stated wishes and concerns of the community that will be blighted by these unsustainable, disproportionate and unwanted proposals that are clearly based on GREED rather than on genuine NEED.

Andrew Wilson

03/09/2019

West Lulworth Small Sites. (Aug19)

A. West Lulworth Parish council expressed concern about the inclusion of the 3 small sites in the SD 88 and the Local Plan policy H8. These sites have not been included after any consultation by DC with the parish council and were excluded by the SHLAA Jan18.

West Lulworth is an historic small valley village situated in the SW corner of Purbeck and the parish council is concerned about their inclusion on the following grounds:

1. all the sites are in the AONB, the Purbeck Heritage Coast, and are within 300m of the Jurassic world heritage coast.
2. all are in or adjacent to the West Lulworth conservation area.
3. all are adjacent to, and visible from the scheduled ancient monuments of the Bindon Hill Camp and the Hambury Tout Barrows
4. all are on slopes and highly visible to the roads and footpaths around the village.
5. all have infrastructure problems, limited access and insufficient sewerage and drainage connections. Being a valley flash flooding is an ever present threat.
6. all are remote from facilities such as, shops, surgeries and hospitals, secondary education, and leisure centres.
7. transport is a problem. The nearest A road and railway station is 5 miles away and buses are infrequent. There is a heavy reliance on cars which contribute to climate change.

The parish recognise the need for new homes but feel that this policy does not reflect the intention to spread the small sites over the district. Indeed with 67% of the small sites identified in West Purbeck ward it concentrates the development in the most remote part of the district.

The proposal to “encourage planning applications” will only add to developers aspirations to develop our natural heritage.

Purbeck Local plan review. (Aug19)

Various supplementary documents (SD’s) have been issued arising from the initial process of the plan review. Those relating to the small sites policy are listed here:

SD 88 – review of capacity of small sites

SD 93 – mitigating effects (including revised small sites policy)

SD 98 – affordable housing on small sites and windfall.

SD88- review of the capacity of small sites

Three sites have been identified in West Lulworth as potentially suitable sites.

These are:

1. Adjacent to 1 Church Rd. (SHLAA/0113) This is a particularly sensitive site being located at the junction of Main Rd, leading to the World Heritage site of Lulworth Cove, and Church Rd, leading to the World Heritage site of Durdle Door. These visitor attractions are now attracting over one million visitors per year. Any development here would not only affect the appearance of this gateway junction, but also have major implications for traffic management. There would be an adverse effect on the character and landscape of this area of the village. The site is situated in the valley between the scheduled ancient monuments of the Bindon Hill Camp and the Hambury Tout Barrows and adjacent to the listed buildings of Hambury Farm. It contributes to the distinct setting of Hambury Farm and provides an important green gap between the village and the cove area as recognised by its inclusion in the conservation area. In summer long eared bats and a barn owl are seen here and in winter it can be affected by flash floods. The Jan 18 SHLAA concluded that this site was unsuitable.
2. Adjacent to the village hall. (SHLAA/0067) This is an exposed, steeply sloping site on the edge of the village. Its development would require extensive engineering works adversely affecting the character and

landscape of this part of the village which is opposite the listed Holy Trinity Church and Lych Gate. Access would be onto the busy Church Rd would be difficult and remove valuable unrestricted parking. It would also contribute to "ribbon development" out of the village. The Jan 18 SHLAA concluded that this site was unsuitable.

3. Opposite Wilton Cottage (SHLAA/0066) This site is situated on the very narrow School Lane which already has problems with inadequate sewerage and surface water drainage. The loss of this green field would lead to less drainage and increased run off from hard surfaces. This will be made worse when the 9 new homes are built on the Old School site further up School Lane. This is a very steep site which would require extensive expensive engineering works which would be harmful in landscape and conservation terms. The Jan 18 SHLAA concluded that this site was unsuitable.

SD 93- mitigating effects (including revised small sites policy)

The parish was concerned about several aspects of the small sites policy H8 and suggested several amendments. These have not been acknowledged by the revised small sites policy in that it does not recognise the need to spread the small sites across the district. It does not limit the number of small sites per settlement. This could lead to numerous applications around one settlement leading to an old village being surrounded by new homes. It does not require the council to consult the Parish or Town Council.

The parish suggest modification to Policy H8: (Amendments underlined)

These provide an opportunity to spread developments across the District where larger developments would be unacceptable.

Applications for small sites will be permitted where adjacent to existing homes in the closest town or village (as defined in the settlement hierarchy in the glossary of this plan), and not appear isolated in the countryside, provided the following apply:

a) the scale of proposed development is proportionate to the size and character of the existing settlement, up to a maximum of 30 homes; up to a maximum of two sites per settlement over the period of the plan; and not exceeding 10% of the existing settlement.

b) 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; and

c) the development would contribute to the provision of a mix of different types and sizes of homes to reflect the Council's expectations in Policy H9 or, where expressed in a neighbourhood plan, and those of the relevant local community.

d) the development would be identified in consultation with the appropriate Parish or Town Council.

SD 98 – affordable housing on small sites and windfall.

The parish council note that the estimation of affordable homes in small settlements does not meet with their local housing needs. The highest need is for affordable rented housing for new households and low waged employees rather than market housing which is well outside the price range of local residents.

We note that in Table 1 Lulworth has 30% affordable compared with Winfrith at 20%

Purbeck Plan SD88 Suitable Sites

<p>Adjacent to 1 Church Road</p>	<p>SHLAA/0113</p>
	<p>Key issues:</p> <ul style="list-style-type: none"> <input type="checkbox"/> AONB and Purbeck Heritage Coast; <input type="checkbox"/> West Lulworth Conservation Area; <input type="checkbox"/> Isle of Portland to Studland Cliffs Special Area Conservation; <input type="checkbox"/> Setting of listed building (Hambury Farm House and associated outbuildings Grade II); and <input type="checkbox"/> Flood risk (moderate/high risk from surface water flooding). <p>Conclusion: Potentially suitable small site. North western side of site unsuitable. Subject to a suitable layout potential for around 4 new homes. Effects of development on SAC would require screening and potentially appropriate assessment.</p>
<p>Adjacent to the Village Hall</p>	<p>SHLAA/0067</p>
	<p>Key issues:</p> <ul style="list-style-type: none"> <input type="checkbox"/> AONB/Purbeck Heritage Coast; <input type="checkbox"/> Setting of the West Lulworth Conservation Area; <input type="checkbox"/> Flood risk; <input type="checkbox"/> Isle of Portland to Studland Cliffs Special Area Conservation; and <input type="checkbox"/> Setting of listed buildings (Holy Trinity Church and Lych Gate Grade II). <p>Conclusion: Potentially suitable small site. Steeply sloping site with flood risk around its eastern edge (may make it difficult to achieve suitable layout). Subject to suitable design, possibility for 4 new homes. Effects of development on SAC would require screening and potentially appropriate assessment.</p>
<p>Opposite Wilton Cottage</p>	<p>SHLAA/0066</p>
	<p>Key issues:</p> <ul style="list-style-type: none"> <input type="checkbox"/> AONB/Purbeck Heritage Coast; <input type="checkbox"/> West Lulworth Conservation Area; <input type="checkbox"/> Isle of Portland to Studland Cliffs Special Area Conservation; and <input type="checkbox"/> Setting of listed buildings (51 School Lane, detached outbuilding to west of Number 51 and telephone kiosk Grade II). <p>Conclusion: Potentially suitable small site. Site rises steeply from north to south. Subject to suitable design, possibility for 4 homes. Effects of development on SAC would require screening and potentially appropriate assessment.</p>

NPPF extracts.

172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and **Areas of Outstanding Natural Beauty**, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks.

The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the **landscape** and recreational opportunities, and the extent to which that could be moderated.

173. Within areas defined as **Heritage Coast** (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a **Heritage Coast** is unlikely to be appropriate, unless it is compatible with its special character.

184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as **World Heritage Sites** which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

185. Plans should set out a positive strategy for the conservation and enjoyment of the **historic environment**, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the **historic environment** to the character of a place.



Clerk to Council: Mrs Jacqueline Hughes
Parish Office, D'Urberville Centre, Colliers Lane, Wool BH20 6DL

Ms B Dowers
Planning Inspector
Purbeck Local Plan

Dear Ms Dowers,

I am writing to you on behalf of Wool Parish Council regarding the recent hearings for the review of the Local Plan for Purbeck. I have detailed their key points noted below.

Ref: SD92: Addendum to Sustainability Appraisal 2019 [SD02]

Wool Baseline assessment

96. Wool is a key service village in Purbeck with a population of 5,761, only marginally less than Wareham. It has the lowest population of over 65s and the highest of under 65s. The facilities at Wool are suitable for the size of the area including two primary schools, convenience stores and independent shops. On a main route, Wool has excellent access to the strategic road network and a train station though buses are infrequent. *Wool has no buses in winter months. Bovington only has buses when the school is running, you can get a bus out at 8am but cannot return until 4pm*

39.9% of Wool's residents own 2 or more cars and only 12% of residents do not own a car. This is fairly average for Purbeck.

If this is extrapolated to include the proposed extra houses, if 40% of the new houses generate 2 or more cars, that is a minimum of approximately 400 extra cars – and yet there is no acknowledgement of possible traffic congestion/pollution etc. and no specific infrastructure provision.

Also noted is the reference to Bovington being a key service village, this is incorrect. Bovington is part of the Parish of Wool. Wool is the 'key service village' The Bovington settlements are more than one mile from the train station, they have no bus service and no other amenities.

There has been references made in the hearings and local media that Wool has a population of 5000+ which is incorrect. The Parish of Wool, which includes Bovington, East Burton and Wool has a population of 5011. Wool does not. Comparing Wool Parish with an increase of 470 homes is completely different comparing the VILLAGE of Wool which has a population of around 2900.

97. Just over half of the residents own their home here and there is a large variety of detached, semi-detached and terraced properties. Crime rates peaked in August of 2018 but have shown a downward trend ever since. It is one of the more popular places for people on the housing register and average house prices are moderate in comparison with the rest of Purbeck with very similar costs to Wareham and Sandford.

This avoids the issue of which bands on the Housing Register are being considered. The statement implies that Wool is one of the more popular places by people who simply wish to move/relocate, possibly even from out of area.

98. Though there are small pockets of biodiversity to take into account, including ancient woodland, this is replanted ancient woodland and the effects on biodiversity can be mitigated for. The AONB lies to the south of Wool. The old town of Wool is a conservation area and there is risk of surface water flooding towards the flood plain. Again, impacts on these aspects can be mitigated for. *No actual evidence is offered with regard to suitable mitigation specific to Wool, or specific to identified problems. Wool is not a town.*

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It should be noted that neither of the locations identified realistically offer employment opportunities to the actual Wool area demographic. It should be pointed out that only a tiny percentage of those currently employed on the DIP site actually live locally. Even if the employment opportunities for unskilled/non-technical posts increases, the implication is for even more traffic congestion from commuters.

Wool's capacity for growth

Capacity of housing sites identified as being potentially available and suitable: • SHLAA sites: SHLAA/0102 for 111 units, SHLAA/0101 for 42, SHLAA/0100 for 138, SHLAA/0099 for 306, SHLAA/0082 for 49 = 646

- Allocated sites: 470 homes
- Small sites: 22
- Outstanding planning permissions: 4
- Total number of potential homes: 1,142
- Employment sites availability: 43.4ha of which 38.4ha remains available.

100. Increasing the housing numbers at Wool, above that allocated in the Plan would help meet the housing need in the area covered by the Purbeck Local Plan. As further growth potential is reasonably significant it is likely to support additional facilities or provide improvements to public transport provision: the current allocation proposes retail development, enhancements to community facilities and contributions towards education and transport. Employment provision has significant potential for accommodating growth.

There is no evidence to support the claim for "Employment provision [having] significant potential for accommodating growth."

101. Wool has areas at risk of surface water flooding so any further sites would need to provide information on how they would mitigate any potential adverse impacts on Wool. The sites are otherwise relatively unconstrained.

102. Allocating more homes is likely to have a negative impact on the pollution and consumption of natural resources due to the construction phase of housing and additional traffic generation.

SD95: Care home provision - modification to improve clarity (*this amendment still does not improve clarity*)

Amendment Purbeck's ageing population will be catered for by the provision of care facilities two 65 bed care homes – one at Wool and One at Moreton. at Wool and Moreton Station / Redbridge Pit, as well as specialist purpose built accommodation at Wool, Moreton Station/Redbridge Pit, Lytchett Matravers and Upton.

From Amendments: Land at Wool as shown on the policies map will help to meet the District's development needs by providing a total of 470 new homes, a 65 bed unit care facility, home, community facilities and supporting infrastructure. The type of care provided will be dependant dependent on the changing needs of older people in Purbeck and in consultation with local health and social care providers.

1. The needs of older people and disabled people are changing and we need to be able to respond to this accordingly. Planning Practice Guidance states the provision for older people should be 'considered from the early stages of plan-making through to decision taking'. Due to an updated strategy from Dorset Council's adult social care service, focussing on extra care as well as specialist

purpose built care accommodation, the Council is proposing modifications to the plan so it is fully able to meet the changing needs of the ageing population.

2. Changes to the policy 2. Planning Practice Guidance states 'offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems'. To provide care that is in the best interests of the public, Dorset Council is moving away from providing traditional nursing care homes where residents have no tenancy rights and are charged to fund their care. Instead it is moving towards providing extra care housing. This also helps 'reduce costs to the social care and health systems' which is in accordance with Planning Practice Guidance. Extra care housing provides more care than specialist purpose built accommodation such as sheltered housing or retirement living: it is where people have access to personal care and support services available up to 24 hours per day, their own front doors and tenancy or even ownership rights. 3. The Strategic Housing Market Assessment (SHMA) [SD21] identifies a need for 131 nursing and residential care bedspaces (use class C2) in the Purbeck area over the period 2013 to 2033 (table 86 of SD21). It is now considered that extra care housing will be the best way to deliver this need (either as C2 or C3 depending on consultation with health and care providers). Providing this care within the largest allocated sites will enable the residents to be well connected to their communities. To make this intention clear, the wording in Policy H4, H5 and H9 needs to be altered. 4. The SHMA [SD21] also identifies a need for different types of specialist housing for those needing less care than 'extra care' would provide and suggests there would be a need for around 598 homes with a housing need of 3,080 homes over the plan period (Paragraph 9.30, SD21: SHMA). At the time, this was about 20% of the housing need.

If the latest amended proposals are understood to mean that 'residents' would purchase their own accommodation, then it clearly underlines that firstly these 'units' would be in addition to the 470 allocated houses, and secondly that Dorset Council would not be financially responsible.

Policy H9 stated aim above is to provide specialist purpose built accommodation. However the SHMA does not stipulate the type of specialist care accommodation to be provided. How can purpose built accommodation be delivered when the type of specialist care is unknown? This policy is left sufficiently vague for the specialist care units not to materialise and for the 94 units for 'specialist care' to suddenly become 4/5 bed houses. There is a precedent for this. During the building of Purbeck Gate land was set aside for the new surgery. GPs declined the offer and the Parish Council at the time was keen to see the land set aside for another community use. Barratts put in a planning application for additional housing – it was granted.

5. To help plan for appropriate housing, Policy H9 includes the requirement for 20% of market and affordable housing on allocated sites to provide specialist purpose built accommodation. This is in addition to the extra care housing proposed. 6. The SHMA does not stipulate the type of specialist care accommodation that should be provided as it is expected that the local authorities will make decisions that reflect the specific needs and current supply of different types of units available (paragraph 9.33, SD21). 7. Adult social care service supports this flexibility and so Policy H9 equally does not stipulate the type of care to be provided. The actual care provision will be adaptable and determined in consultation with health and social care providers with needs being met via a range of interventions and services. It is anticipated that the care provided will be flexible enough to respond to the changing needs of an ageing population, those with disabilities and supportive of those with increasing health problems.

8. The table below shows Allocation Wool: Specialist care accommodation (20% of the total numbers) 94 Extra care (in addition to the total numbers) 65



Policy H5: Wool Land at Wool as shown on the policies map will help to meet the District's development needs by providing a total of 470 new homes, a 65 bed unit care facility care home, community facilities and supporting infrastructure. The type of care provided will be dependent on the changing needs of older people in Purbeck and in consultation with local health and social care providers.

It is clear that there are already major additions to the 470 allocated houses being considered. There appears to be a contradiction in that Dorset Council policy is for an extra care 'campus' of 65 units (in addition to the 470 houses) but seemingly this is added to by a further 94 Specialist care accommodation provision. It is still not clear exactly what is proposed.

SANG advice to Dorset Council

NB the SANG advice to Dorset Council makes no mention of the proposals for Wool.

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

8.23 The 2016 options consultation document identified capacity for about 1,000 dwellings on sites around Wool. However, the submitted local plan only allocates land for 470 homes, leaving the potential for about 530 homes on sites that have been previously considered.

However – this still does not address what the actual local need is. Why are parish councils encouraged to draw up a Housing Needs survey the results of which are not used in this plan? The latest survey for Wool revealed 17 households in need. The results for Moreton was apparently 1 household in need. Yet both settlements have been given the largest number of houses.

SD 97 Summary of key stakeholder's issues raised regarding viability of the Local Plan and its policies.

What is the definition of a key stakeholder? It seems that they are all developers? Are Council Tax payers stakeholders?

The documents are at odds in various places. There is mention – for example – of Dorset Council noting to the 470 allocation, that the public were consulted on but elsewhere, there is tacit acceptance that this could increase in terms of 'uplift' to over 1,000

There is no specific reference within the documents to a guaranteed and agreed provision of numbers of genuinely affordable housing. The 2018 consultation 'sold' the idea of between 40% and 50% of housing being 'affordable' (although it was very careful to avoid actually defining what 'affordable' really meant). In the Memorandum of Understanding, Savills suggest that it might consider up to 30%

There is a total lack of clarity within the documents on sustainability, and in the amendments summary, of any sort of guarantees on infrastructure, especially in terms of:

- Traffic congestion and mitigation
- Schools provision (bearing in mind that all three of local primary schools are now academies, and therefore fall outside Dorset Council's control)
- Health facilities – the MOU effectively says that the Health Centre is physically big enough – but it makes no mention of how extra GPs are to be recruited.

There was an increasing amount of documents added at the last minute to the hearings and nobody had time to review them. The hearings were well structured and we are grateful to the detail put into them, however felt there were too many changes and did not reflect what the public were originally consulted on. Based on this, if the plan is declared sound the full plan needs to be put out to public consultation and not just the changes. To the normal person on the street who knows nothing about the planning process these changes would not be understood. The whole plan with the changes needs to be consulted on as only consulting on the changes would make no sense because you need to know the rest of the plan to understand what it is happening.



Not everyone can attend the hearings and when they do items are moved to different dates and items have been spoken about on different days and there seems to be a conclusion that the matter has been settled. When it is then the day for the item it has already been decided that that particular item has been reviewed and no further discussion. When an agenda has been set, the precedence should be that only that item is discussed for that agenda.

Furthermore, only allowing people who have asked to speak to the Inspector, to submit their comments is not a fair process. All these new items have gained public attention and not allowing comments from the wider public is not allowing them to be democratically involved. It looks like the developers are writing the plan on behalf of Dorset Council.

Wool Parish Council urges consideration be given to the points noted, however a Full Public Consultation must be carried out because there has been and will be changes to what the public were originally consulted on.

Should you require any further information, please contact me.

Yours sincerely



Jacqui Hughes
Wool Parish Clerk

Purbeck Local Plan Review Examination

Further representations on behalf of Dudsbury Homes (LM) Limited

Prepared by Intelligent Land
September 2019

In relation to:
Land at Middle Road, Lytchett Matravers.



Appendices:

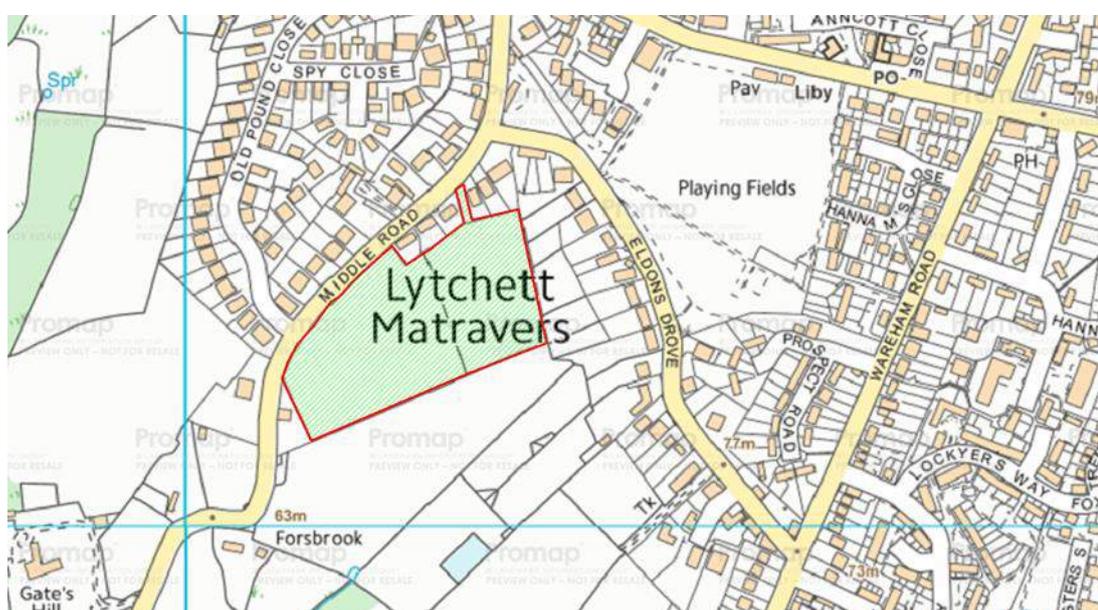
A – Concept layout plan for land at Middle Road, Lytchett Matravers

B – E-mail confirming position on SANG provision for the Middle Road site.

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1. Introduction

- 1.1 Intelligent Land has been representing Dudsbury Homes (LM) Limited in respect of their site at Middle Road Lytchett Matravers. This site has been submitted to the Purbeck Local Plan Review for inclusion as a housing allocation.
- 1.2 A location plan of the site is shown below and a concept layout plan as submitted to the Council is attached as Appendix A.



- 1.3 Intelligent Land has represented Dudsbury Homes at both sets of hearing sessions of the local plan Examination in July and August 2019.
- 1.4 At the hearing session in August, significant further information had been submitted to the Examination partly in response to questions from the Inspector at the July hearings. The very late submission of this information did not allow enough time at the August hearings to consider it properly, and the Inspector therefore allowed all parties to consider the information further and make further representations if they so wished by the 10th September.
- 1.5 This document, contains the further comments of Dudsbury Homes (LM) Limited on the additional information the Council has submitted to the examination.

2. Dudsbury Homes' position

2.1. Dudsbury Homes submitted representations on the Pre-Submission Purbeck Local Plan. In brief summary, these made the following points:

- That the calculated housing requirement of 2,688 dwellings (168 per annum) had used the wrong base year for undertaking the calculation.
- That using the correct base year, and affordability ratio as per the standard methodology would produce a minimum local housing need of 184 dwellings per annum, a total of 2,944 dwellings.
- The existing adopted local plan for Purbeck already has a housing requirement (120 dpa) well below the objectively assessed need identified in the local housing evidence for the area of 170 dpa.
- The Council is therefore still failing to deliver a step change in housing delivery as required by the Government in the NPPF.
- It is unclear how the Council has selected 3 of the 4 sites in Lytchett Matravers identified as having potential in the Council's SHLAA, for allocation in the plan, whilst excluding the Middle Road site.
- Any uncertainty over Heathland Mitigation for the Middle Road site, has been addressed and this was confirmed to the Council well before the Pre-Submission document was produced.
- Lytchett Matravers is the largest village in the Purbeck area and is identified as a sustainable location for development in the local plan.
- The Middle Road site is well located in the village, close to facilities and services, and its impact on Green Belt is judged, in the Council's own evidence, to be low.

2.2 These representations have been advanced further at the July and August hearing sessions, but it is important to summarise them here for context.

3. Comments on further information from the Council.

3.1 The Dorset Council submitted a considerable amount of additional material to the Examination just a matter of days before the August hearings. It was acknowledged at the first session of the hearings that there had been very little time for these to be properly

considered. Additional time for representations was allowed, and further hearings are set to take place in mid-October.

3.2 Dudsbury Homes wishes to comment further on the following documents submitted to the Examination:

- SD85 – Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need
- SD86 – Purbeck Local Plan: Review of Sources of Housing
- SD87: Revised Five-Year Housing Land Supply Report
- SD93 – Strategy for mitigating the effects of new housing on European sites and justification for changes to green belt boundaries at Morden.
- SD98 – Estimation of affordable homes from small sites and windfall.

3.3 Comments on each of these documents are set out below in turn.

Comments on SD85

3.4 The Inspector has clearly been concerned about the level of housing delivery set out in the Purbeck Plan. Dudsbury Homes and others have already commented that the housing requirement has been incorrectly calculated and will lead to under supply of housing.

3.5 The Council's response to this is set out in document SD85. This sets out how the Council will provide a requirement of 180 dwellings per annum, or an additional 192 dwellings in the plan period. The document also considers higher requirements of 200 and 228 dwellings per annum.

3.6 The Council now concludes that it can demonstrate a total supply of 3,122 dwellings as compared to 2,688 in the submitted local plan. This represents an additional 434 dwellings supply. The Council accordingly considers that it can meet any increased housing requirement of 180 dwellings per annum, although would still fall short of higher requirements. It considers that higher housing requirements should be tested through a new Dorset Council Unitary Plan rather than through the Purbeck Local Plan.

3.7 The additional supply comes primarily from 4 sources:

- The addition of completions from 2018/19
- The addition of extant consents from 2018/19

- The allocation of a site at Westminster Road, Wareham previously included in a neighbourhood plan
- A review of the windfall allowance
- A review of the capacity of small sites

3.8 In practice, it has been made extremely difficult to accurately compare the supply position in the revised Policy H2, with the submitted plan version. This is a result of reclassifying sites which were previously allocations to neighbourhood plans into the Local Plan. What is clear however, is that any additional supply primarily results from windfall, small sites, and one additional allocation in Wareham.

3.9 In respect of the Wareham allocation, the Inspector’s attention is drawn to section 9 on page 6 of Document SD86. This suggests the inclusion of a site at Westminster Road, Wareham as an additional allocation in the local plan, rather than in a neighbourhood plan. This presumably is an attempt to increase the certainty of housing supply in the plan.

3.10 It is noted however, that the document states “consideration is now being given to the allocation of the site west of Westminster Road (H4) in the local plan, **subject to SANG provision sufficient to deal with the cumulative impact of all the development north of the railway line.** In anticipation of this change, this site is now shown as a local plan allocation, rather than a site identified in the neighbourhood plan”. (our emphasis).

3.11 This demonstrates an inconsistent approach by the Council when compared to the Dudsbury Homes site at Middle Road, which has been rejected based on perceived uncertainty over heathland mitigation. In comparison, the Westminster Road site has been formally allocated despite uncertainties over such mitigation.

3.12 In effect, any further additional supply – other than additional completions – remains from small sites or windfall. Taken together these provide 947 dwellings or 30% of total supply. The table below shows this supply as a percentage of various requirements:

HOUSING FIGURE	% FROM SMALL SITES AND WINDFALL
CURRENT LOCAL PLAN REQUIREMENT – 2688	35.2%
REVISED LOCAL PLAN REQUIREMENT – 2880	32.8%
REVISED SUPPLY ESTIMATE - 3122	30.3%

3.13 Whilst the Council has made efforts to review its housing supply and to try to avoid double counting, it remains clear that a very significant element of the plans housing delivery will be both unpredictable and uncertain from very small sites. This has several unwanted consequences for the plan:

- It provides a very significant element of uncertainty in terms of when, and where, housing will be delivered;
- It will greatly reduce and slow the provision of much needed infrastructure in tandem with housing delivery as most of these sites will not make any contribution to infrastructure;
- It will greatly reduce the amount of affordable housing delivery in the plan period (see further comments below);
- It may affect the robustness of the Council’s five-year housing land supply, leading to unwanted “planning by appeal”.

3.14 Overall, the revised approach once again fails to deliver a step change in housing delivery through this local plan. With almost one third of housing supply from small sites and windfall, the plan cannot demonstrate a certain and deliverable housing strategy which will meet housing needs and deliver growth and infrastructure improvements.

3.15 Dudsbury Homes considers that the Council should have revisited potential further housing allocations on larger sites in order to address the Inspector’s questions on meeting increased housing supply. Sites such as Middle Road can deliver a quantum of housing in sustainable locations capable of delivering quality development, affordable housing, and infrastructure provision, with certainty of delivery.

Comments on SD87

3.16 The uncertainties over delivery created by the Council’s latest housing position are set out above. This uncertainty is reinforced however in the updated five-year housing land supply position, submitted as document SD87.

3.17 This document attempts to show a marginal supply of 5.32 years but is based on having a windfall sites supply of 186.6 dwellings – or 15% of total supply.

3.18 This represents a relatively high windfall allowance compared to many other former Dorset authorities locally, for example:

- Poole – 11%
- Christchurch – no windfall allowance assumed.
- East Dorset – no windfall allowance assumed
- Bournemouth – no specific windfall allowance assumed but 8% estimated from PD change of use.
- West Dorset/Weymouth – 10%
- North Dorset – 3%

3.19 Purbeck’s reliance on windfall sites in its five-year housing supply is significantly higher than adjoining areas. The next highest percentage of windfall is in Poole, but, as a relatively large urban borough, it might reasonably be expected that more windfall development would come forward.

3.20 Whilst national guidance does not exclude the consideration of windfall in calculating five-year land supply, the whole principle of five-year supply, as set out in the NPPG, is that it should be a supply of “specific deliverable sites”. Windfall sites may well come forward to some extent, but significant reliance on windfall, such as is the case in Purbeck, goes against the intention of Government policy.

3.21 It should be noted that, without the 186.6 dwelling assumption from windfall, the housing supply for Purbeck would fall to just 4.54 years.

3.22 In addition to this, the Council includes a significant supply of 545 dwellings on allocated sites in its five-year supply. The NPPF requires that clear evidence of delivery is provided to support allocated sites being forecast for delivery in a five-year supply estimate. Dudsbury Homes has reviewed the evidence supplied in Appendix 2 to document SD 87 and considers this evidence is not sufficiently robust to provide any certainty of delivery other than in the case of the Wyatt Homes sites at Lytchett Matravers. In the case of other sites, there does not appear to be any information provided directly from a developer and such details as are provided are sketchy to say the least.

3.23 Based on this review, Dudsbury Homes consider that a further 395 units could reasonably be removed from the five-year housing land supply, thereby further reducing supply to just 2.91 years. Taken together, these factors highlight that the updated five-year housing land supply position in Purbeck is both marginal and uncertain.

Comments on SD93

- 3.24 Dudson Homes welcomes the submission of document SD93 as it provides much greater clarity on potential heathland mitigation across the plan area.
- 3.25 As set out in Section 2 above, the only obvious reason why the Middle Road site was not selected for allocation in the local plan appears to surround uncertainty over heathland mitigation. This was despite written assurances to the Council that mitigation for the development was secured (see Appendix C).
- 3.26 The Council's submitted document contains a helpful list of all potential SANG proposals in the plan area and includes an assessment of their capacity. At Lytchett Matravers, a SANG of 7.6 hectares is to be provided, which will serve the needs of a population within a 2km radius, and 150 new dwellings allocated in the plan. Notably however, the document states that there is spare capacity for approximately 260 dwellings from the SANG provision in the village.
- 3.27 The Inspector is therefore encouraged to reconsider the Council's rejection of the Middle Road site in terms of heathland mitigation on the basis that there is more than adequate capacity at the Lytchett Matravers SANG to accommodate the dwellings at Middle Road, and that Dudson Homes has secured agreement to use this SANG as mitigation for their development.

Comments on SD98

- 3.28 A further consequence of the reliance on an uncertain and unpredictable reliance on small sites and windfall is demonstrated in document SD98. This provides a useful estimate of the amount of affordable housing likely to be provided through small sites and windfall development.
- 3.29 From small sites, a total of 47 dwellings (46.9) is estimated, which represents 34% of all small sites' dwellings being affordable homes. For the windfall sites, the Council notes the following:

Based on past delivery rates over the preceding five years, the delivery of homes on windfall sites is estimated to be around 62 per year. The past delivery of affordable homes over the same period on these windfall sites has been around 0.8 dwellings per year. To avoid double counting, no allowance is made for windfall within the first two years giving a total of approximately 10.4 windfall affordable housing units.

3.30 It is clear therefore that a reliance on small sites and windfall will have a very limited impact on affordable housing provision. Even if the Council's estimate was accurate, a maximum of just 57 affordable homes will be provided from these sources across the plan period. In practice however, many small and windfall sites are likely to be unviable if subject to affordable housing contributions, and this will further reduce the already modest level of delivery. Most, if not all, of the small and windfall sites will be making financial contributions to affordable housing rather than physical on-site provision. This is likely to lead to delay in provision while suitable sites are found.

3.31 In contrast, allocation of the Middle Road site, for approximately 30 dwellings, would, alone, provide 12 units of affordable housing – a greater amount that is predicted to come from windfall sites across the entire plan period. This merely serves to highlight the weaknesses in the Council's approach.

4. **Conclusion.**

4.1 It is very clear that the Council's revised approach to housing supply does nothing to deliver a step change in housing delivery in the Purbeck Local Plan. It also creates significant uncertainty over where and when housing will be delivered with its reliance of a third of supply from small and windfall sites.

4.2 Reliance on these sites will undoubtedly impact on the delivery of much needed affordable housing and infrastructure and may also lead to poorer quality development.

4.3 Dudsbury Homes invites the Inspector to consider its site at Middle Road, Lytchett Matravers, as a sustainable alternative to the Council's strategy of windfall and small sites. The site is deliverable and can also deliver infrastructure and affordable housing capable of sustaining the village. Any doubts over mitigation of Heathland impact have been addressed both by Dudsbury Homes and by the Council's own estimate of SANG capacity in the village.

4.4 The Inspector is therefore requested to recommend allocation of the Middle Road site as a modification to the Local Plan.

A – Concept layout plan for land at Middle Road, Lytchett Matravers

This is attached separately.

B – E-mail confirming position on SANG provision for the Middle Road site.

This is attached separately.

Land South of Middle Road - Lytchett Matravers

Concept Masterplan for up to 30 dwellings

looking south west towards Poole Harbour and the Isle of Purbeck



looking north up proposed access path



looking north



looking north east



KEY

-  Illustrative development areas
Circa 1ha
-  Open Space
-  Shared Surface
-  Public access

Intelligent Land
 The Studio
 Ferndown Forest Golf Club
 Forest Links Road
 Ferndown Dorset
 BH22 9PH
 +44 (0)1202 570 471
 www.intel-land.com

Project Land South of Middle Road - Lytchett Matravers

Drawing Concept Masterplan

Drawing No 1 Scale 1:1250@A3

Date 09.08.2018

plp.programmeofficer

From: Nigel Jacobs <nj@intel-land.com>
Sent: 05 June 2018 16:32
To: Frances Summers
Subject: Land off Middle Road, Lychett Matravers

Importance: High

Dear Frances

Following our meeting a couple of weeks ago and completion of an updated SHLAA form by return of email I am now able to confirm that Dudsbury Homes Ltd have reached agreement with Wyatt Homes over access and use of the proposed SANG at Lychett Matravers.

The agreement allows for about 40 dwellings to be accommodated thereby mitigating their impact upon the internationally important heathland sites in south east Dorset. It is my understanding through discussion with Nick Squirrell of Natural England that the proposed SANG has capacity far in excess of the combined number of dwellings proposed from the Lychett Matravers sites that were most recently consulted upon plus the site at Middle Road.

There is no paperwork associated with the agreement between Dudsbury Homes Ltd and Wyatt Homes Ltd but please take this email as a record of the agreement between the parties.

I hope that this provides sufficient assurance for your purposes and if I can be of any further assistance please do not hesitate to get in touch.

Kind regards

Nigel Jacobs BA (Hons) MRTPI
Operations Director



we look at property differently

The Studio | Ferndown Forest Golf Club |
Forest Links Road | Ferndown | Dorset | BH22 9PH
+44 (0)1202 570 471
nj@intel-land.com
intel-land.com



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Please note any advice contained or attached to this report is informal and given purely as guidance unless otherwise explicitly stated. Our views on value are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our advisory role. No liability is given to any third party and the figures suggested are in accordance with Professional Standards PS1 and PS2 of the RICS Valuation – Professional Standards, effective from 6th January 2014. Any advice attached is not a formal ("Red Book") valuation, and neither Intelligent Land nor the author can accept any responsibility to any third party who may seek to rely upon it, as whole or any part as such.

The Morden Park Proposals – Strategic SANG and Holiday Park green belt release

Further Statement Following July and August Hearing Sessions

Covering Matters : H, Issue 3, Policy I5 : SANG

And

C, Issue 1, Policy I5 : Morden Park – Green Belt Release and related strategic SANG

Representer No: 1190180

Prepared by: Pro Vision on behalf of The Charborough Estate

Our Ref: JC/2273



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1. Introduction

- 1.1 This statement has been prepared on behalf of The Charborough Estate which owns land identified under Policy I5 for a Strategic SANG with related Holiday Park for which a green belt release is proposed. Proposals have been worked up jointly with the Local Planning Authority, the Highway Authority and Natural England.
- 1.2 A Memorandum of Understanding between parties was prepared in June 2019 and further information is contained in relevant statements including those prepared by :
- a) **Dorset Council** – Responses to Inspector’s Matters, Issues and Questions Matter C: Green Belt and Matter H : Infrastructure : 7 June 2019;
 - b) **Footprint Ecology SD93** – Strategy for mitigating the effects of housing on European sites and justification for changes to green belt boundaries at Morden; SD89 – proposed amendments and additions for the final Purbeck Local Plan HRA 2019;
 - c) **Natural England SD93** – SANG advice to Dorset Council ; 26 July 2019; and
 - d) **Pro Vision** – Statement on behalf of the Charborough Estate in respect of Morden Park and related SANG, June 2019.
- 1.3 The information set out in these statements is not repeated here. This statement seeks to address queries raised in earlier Hearing sessions for Matters H (Issue 3) and Matter C (Issue 1) – both concerning Policy I5.
- 1.4 In addition, this statement specifically addresses HRA matters insofar as they relate to Policy I5 and its robustness. It is understood that this will be subject of further discussions at the Hearing session programmed for the morning of 11 October 2019.

2. Policy I5

2.1 Policy I5, as currently drafted, reads:

*“The area shown as the policies map will be developed as a strategic SANG and holiday park subject to agreement between the applicant, the council and Natural England.
Policy I5 : Morden Park strategic suitable alternative natural green space (SANG) and holiday park”*

The policy is supported by sub text (paras 255 – 257) and the policies map that shows the boundary for the entire I5 site, the boundary of the strategic SANG and the Policy V2 green belt release to facilitate the holiday park.

2.2 The Council has been asked to consider whether it believes the wording of this policy to be “sufficiently robust”. It is the landowner’s view that the policy is clear and robust in terms of evidence and justification. It complies with the legal requirements of the 2004 Act as an element of the Local Plan which is:

- positively prepared;
- justified;
- effective; and
- consistent with national policy.

This is made clear in the policy sub text (255-257) and in the related HRA and SANG documentation produced for the hearings.

2.3 Whilst the wording of the policy could be expanded with more words, detail and cross references, it contains the essential elements and is clear in relation to both the SANG and the holiday park and the link between the two.

2.4 Other Policy I5 matters raised in earlier hearing sessions with landowner responses /observations are set out below:

- **Size of area subject of green belt release** – this was queried by Dr Langley who made the point that it was a larger area of land than other releases for housing sites. The important

point to understand in regard to the site area is that the new holiday park is intended to be low density and low impact in a natural environment. The holiday units are likely to be grouped in small clusters spread over a wide area with intervening areas of woodland within the holiday park but remaining as woodland. Some of this woodland is on a rotation and will be periodically cleared as part of ongoing forestry operations on the Estate. However, the period between crop felling is between 25 – 70 years. It is a very long term, low impact and rotational operation with very little if any activity in the intervening period. It would not be appropriate to make smaller green belt releases for the clusters of holiday accommodation only as the whole area is for the holiday park and in addition to the accommodation there will be a need for access paths and structures for other purposes to enable the wider area to function as a holiday park. It is in no way comparable with the areas for green belt releases for high impact housing development. The area needs to be defined for rural holiday park development.

- **Why the green belt release is needed** – if Main Modifications 18-20 had not been deleted Policy 15 would remain, but with no clear approach for the delivery of the holiday park development that is needed to enable the SANG. The SANG site is currently productive arable land with a tenant farmer and hence there is a significant cost to the Estate of enabling and establishing the public access, walkways, parking areas, signage and landscape needed for it to function effectively. Without the holiday park it is doubtful that the SANG would be achievable in this location. Further, recent market testing and investigations by specialists appointed by the Estate (Savills) have shown that a development partner with the necessary backing from financial institutions is unlikely to be forthcoming without the green belt release. The risk is perceived as too great relative to the costs of the necessary survey, design and planning application related work that would need to be done to get to a consented stage. Hence, the green belt release is needed to attract a development partner that is required to facilitate delivery of the scheme and, in turn, the holiday park is needed to enable the SANG. The SANG is a requirement, as a part of a package of measures, to mitigate for development in the northern part of the District throughout the plan period (as set out in both the PLP1 HRA and the PLP Partial Review HRA).

- **Potential for the creation of an incongruous island within the green belt** – this concern was also raised by Dr Langley. It is important to note that the area of the holiday park is central to the wider Estate and it is not intended that the freehold would be sold. It would remain as part of the Estate albeit with a leasehold arrangement in place with an operator and developer. As outlined above, forestry functions would continue and the Estate would maintain strict control over design, access and management to ensure a low impact, high quality development with relatively dispersed accommodation units. The units of accommodation are likely to be timber clad, eco-friendly units within a natural setting in line with latest trends in design and customer demand. It is fundamental to the scheme that it remains quiet and secluded and none of the intended development is likely to be visible from any of the surrounding roads or rights of way. The boundaries are well wooded. It would in effect be completely screened from public view. It is therefore difficult to see how it could be perceived as an incongruous island within green belt.

3. HRA – Strategic SANG

- 3.1 The strategic SANG requirement for the northern part of the District is necessary to mitigate for the effects of windfall and small site infill development in the northern part of the District. This includes some development that has already taken place, development that might take place within the plan period and development beyond the plan period. Natural England has indicated that it has capacity to mitigate for between 600 – 1000 new homes. The SANG has a dual purpose in also enabling the diversion of activity away from the Morden Bog / Wareham Forest area that needs to be brought back into favourable conservation status.
- 3.2 Alternative sites on the Charborough and other estates have been considered but are not suitable, effective or achievable. This has been confirmed by Natural England. The proposed SANG is well located to intercept and divert pressure that is both existing and expected to increase as a result of 'new housing'. This has also been confirmed by Natural England.
- 3.3 Further details on the role of the proposed SANG within the HRA are set out in separate detailed notes prepared by Natural England (SANG advice to Dorset Council -SD93, July 2019) and Footprint Ecology, consultants to Dorset Council (Proposed amendments and additions for the final Purbeck Local Plan HRA, - July 2019)

4. HRA – Holiday Park

4.1 The Jan 2019 HRA (SD03) is comprehensive, including reference to the requirement for the strategic SANG as well as reference to the proposed holiday park. The latter is intended to be a large area with up to 100 holiday chalets and it is acknowledged that it is close to the Dorset Heathlands SPA / Ramsar and Dorset Heath and SAC.

4.2 The HRA considers likely significant effects of the holiday park to interests and features of the designated sites and potential disturbance including to:-

- Annex 1 birds;
- Increased fire incidence;
- Trampling;
- Dog fouling; and
- Water quality.

The HRA goes on to note the requirement for careful detailed design with consideration of constraints to ensure chalets have no adverse effect on the integrity of the European site.

4.3 Discussions have taken place with the Local Planning Authority and Natural England who are both in principle supportive of the proposal in terms of ability to provide adequate and robust mitigation for its own effects as well as providing the SANG to mitigate for effects from development sites elsewhere. The proposals also facilitate very significant enhancement of ecological and landscape value of the Morden Park site, which is steadily being strangled by rhododendron encroachment.

4.4 The Estate as landowner has entered into an outline agreement in the form of the Memorandum of Understanding, June 2019. It has accepted the content of the HRA although it is not agreed that it should be “public open space” (para 6.6). It would be a privately operated and managed area of open space. Further, design elements are yet to be considered in detail although it is acknowledged that they will need to help minimise impacts to the European sites.

PURBECK LOCAL PLAN 2018 - 2034

EXAMINATION IN PUBLIC

**AUTUMN RESUMED HEARING SESSIONS; COUNCIL'S FURTHER SUBMISSION DOCUMENTS;
AND, POTENTIAL LOCAL PLAN MODIFICATIONS**

RESPONSE ON BEHALF OF WELBECK LAND

SEPTEMBER 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 This statement is submitted in response to the additional information that Purbeck (now Dorset) Council (“the Council”) published during the previous round of hearing sessions and the proposed Main Modifications. It also addresses those matters that are to be discussed at the resumed hearings in October 2019.
- 1.4 Welbeck has been left confused and frustrated by the approach taken by both the Council and the Town Council at Wareham. In the last few weeks – through the Purbeck Local Plan Examination – the Wareham Neighbourhood Plan Steering Group has announced that it intends to make modifications to the Neighbourhood Plan. It transpires that these changes include changing the housing requirement in the Plan, the boundaries and quantum of proposed new homes to be delivered on proposed allocation sites and the removal of Welbeck’s land and associated SANG from the Plan. At the same time, land west of Westminster Road has variously been proposed as a new allocation in the Purbeck Plan and also completely struck from the Plan. The erratic nature of the Council’s approach to land west of Westminster Road appears to be directly as a result of the Neighbourhood Plan Steering Group being allowed to lead on strategic green belt issues.
- 1.5 Furthermore, and as accepted by Wareham Town Council following Queen’s Counsel advice, the Neighbourhood Plan cannot allocate and release green belt sites and instead relies on the Local Plan to make such releases. However, it appears the Council is deferring the decision on all allocations, green belt or otherwise, to the Neighbourhood Plan. A Neighbourhood Plan is not subject to the same scrutiny as a Local Plan. There is therefore the real possibility that if insufficient green belt sites are released at this juncture through the Local Plan and it subsequently transpires that many of the proposed brownfield allocations are not in fact deliverable, or that the significant windfall allowance does not deliver, there will be an acute housing shortage within Wareham for which the Neighbourhood Plan could not retrospectively plan, and which the Council could not address until a further green belt review was undertaken at some unknown time in the future.
- 1.6 Welbeck contends that the Council has not sufficiently investigated the suitability, viability and deliverability of ensuring that at least 300 dwellings in Wareham can be delivered and has instead adopted a light touch approach. Welbeck respectfully suggests that it is therefore incumbent on the Local Plan Inspector to satisfy herself that for the purposes of the Local Plan the proposed residential allocations for Wareham are robust and sufficient to meet in full its housing need.
- 1.7 There appears to have been a complete lack of consultation, or even advanced notification, of these proposed modifications to the Neighbourhood Plan (“NP”). To date, Welbeck has not received any proper notification of these proposed changes to the NP. Welbeck has heard, via a third party, that the proposed modifications were published on the Town Council’s website on 11th August, this despite the fact that they are dated 1st August. Since then further proposed changes have also been published, dated 15th August. As a land promoter in the designated area (and the

beneficiary of a previously proposed allocation) it is very disappointing that Welbeck has not been directly contacted to make comment. Moreover, this approach has not allowed members of the local community to make comments on these proposed material and very significant changes.

- 1.8 Appended to these submissions is correspondence between Welbeck / Carter Jonas and the Wareham NP examiner.
- 1.9 Hereunder; Welbeck comments on four of the Council's published documents (SD85, SD86, SD87 and SD92) as they relate to the reconvened 'Housing' (Matter E) hearing sessions and the relevant questions that will be examined. Welbeck also submits comments relating to SD93 and the delivery of SANG, as this now relates directly to its interest (or previous interest) in the Local Plan.

2.0 SD14: UPDATED SCHEDULE OF MAIN MODIFICATIONS TO THE PURBECK LOCAL PLAN (2 AUGUST 2019)

2.1 The Council has taken a very liberal approach to suggesting a range of proposed modifications for the Inspector to consider. Some of these modifications are not consistently reported through the updated evidence submissions made in the intervening period between the July and August hearing sessions. This matter is of acute concern to Welbeck because one of its sites, promoted for development, appears at stages to be proposed for allocation, and at others to be struck from the plan entirely. This is a situation that is also reflected by the irregular way in which Wareham Town Council is now seeking to modify its Neighbourhood Plan, which Welbeck fears, is being given primacy over the Local Plan.

2.2 Some of the proposed modifications have emerged as a result of discussions at the hearings into the Local Plan held to date. Hereunder, Welbeck makes preliminary comments and observations regarding a limited number of the modifications as they relate to the Council's additional submissions and the resumed hearing sessions.

MM28

2.3 MM28 is a proposed modification to include a commitment to reviewing the Plan in the event of increased housing needs being identified. The modification also recognises the likely production of the Dorset wide Local Plan to be produced by the new unitary authority. Welbeck agrees with, and supports, the introduction of this important modification. Housing needs and requirements are likely to increase in Purbeck in the foreseeable future, especially as it is a logical and sustainable location to help meet some of the expected unmet housing needs of Bournemouth, Christchurch and Poole.

2.4 A settlement hierarchy is reintroduced into the Plan through proposed MM33. Welbeck views this as a necessary modification to the Plan to properly articulate the spatial strategy and critically, the appropriate delivery of sustainable development and windfall sites in particular. The operation of the hierarchy, and how the evidence that supports it, has been used by the Council (and the Wareham Town Council) to allocate the quantum and locations for development is, however, still a cause for concern and this is explained further later in this submission.

MM46

2.5 At proposed MM46 - Policy H1 the housing requirement for Wareham is described as "*Identified housing sites in emerging neighbourhood plan for 185 new homes.*" Welbeck has very significant concerns about the appropriateness of this proposed modification and regards it as unsound. The proposed figure is a product of development monitoring and not a need related figure. It is not therefore a 'strategic' requirement and does not properly respect the primacy of the Local Plan. Moreover, the figure is derived from unviable and undeliverable sites, which are considered in more detail hereunder.

MM1 & MM47

2.6 Finally, proposed MM1 and MM47 both include a development allocation for "[Land] West of Westminster Road" for 60 dwellings. Welbeck supports these modifications, and has been promoting them as good planning and necessary inclusions since the submission of the Local Plan. Allocating land promoted by Welbeck will better ensure the provision of new homes in Wareham and critically, will deliver an appropriate and

accessible HIP/SANG on a phased basis that is necessary to properly mitigate planned development in the area.

3.0 SD85: HOUSING NEED IN PURBECK: ASSESSING AND SEEKING TO MEET THE IDENTIFIED NEED

3.1 Welbeck is pleased to read that the Council has accepted that the appropriate starting point for considering housing needs in Purbeck is the Government's standard methodology, and the base date of 2018, which gives an annual figure of 180 dwellings. Welbeck considers that the potential figures of 200 dwellings per annum (dpa) or 228 dpa are likely to be appropriate in the context of a Plan which has a housing objective to provide for the needs (including affordable homes) of local residents. Turning to the arguments presented for not meeting the identified need, Welbeck considers that many of these, especially where they concern land at the north of Wareham (either east or west of Bere Road) are weak. There is potential at north Wareham to go some way to meeting identified needs in a sustainable way.

3.2 In document SD85 the level of proposed growth at Wareham is stated – in table 6 – as 219 dwellings. The derivation of this figure is not explained. It is assumed that it is 'commitments' (outstanding planning permissions at 34) and the proposed allocation of development in the Neighbourhood Plan (NP) at 185 dwellings, with particular reference to the 'capacity' identified in the SA addendum [SD92] of 415 dwellings. In the five year supply document [SD87], the total in Wareham in Appendix 1 appears to be 31 dwellings. Adding the NP allocations of 185 to the small site completions of 31 gives 216 dwellings, which does not match. The capacity identified in the SA Addendum [SD92] is considered in further detail later in this submission.

3.3 Turning to the considerations of the Welbeck sites in SD85: First, land to the 'east' of Bere Road (Welbeck refer to this as 'north' of Bere road) is assessed as follows at paragraph 8.6:

"...the SHLAA shows has capacity for 136 homes (subject to the relocation of the allotments)...submissions to the examination indicate that the site could accommodate 'up to 95 new homes'. This is an option (either including or excluding the allotments) that could be reconsidered, although there are significant issues with the site, including the impact on protected heathlands and the scope for mitigation."

3.4 Welbeck does not recognise any "significant" issues with the site, and this is directly at odds with the Council's SA and SHLAA assessments of the site. Furthermore, Welbeck has long been in discussions with Wareham Town Council, Purbeck District (now Dorset) Council and Natural England, regarding this matter. There is potential to provide mitigation by way of a SANG alongside development on land north of Bere road. This matter is explained in more detail in the letter to Bob Yuille – the Wareham Neighbourhood Plan examiner – which is attached to this submission.

3.5 The assessment of land [east] north of Bere Road continues at paragraph 8.13 of SD85:

"[the site]...lies entirely within the green belt. ...Much of this site is identified as 'high quality landscape adjacent to the town' which includes a 'minor scarp' immediately abutting the existing houses. Part of the site also forms Northmoor Park Allotments, which are identified as a Local Green Space (Site D) in Policy GS1 in the submitted neighbourhood plan."

- 3.6 Welbeck accepts that the site is within the Green Belt but the full extent of the land at north Wareham is identified in the Council's 2018 Green Belt review as being suitable for release from the green belt for residential development. For context, it is of note that the 2018 Green Belt Review was a detailed assessment that built on the initial 2015 and 2016 Green Belt studies also produced by the Council for the purposes of informing the Local Plan. The Green Belt studies/reviews considered the opportunities/constraints of various land parcels and potential impact on landscape was considered prior to concluding on a site's suitability or otherwise for residential development. Moreover, the 2018 Green Belt review, which only identified six sites within the district as suitable, considered specific site boundaries for those sites that were recommended for release with landscape/containment being key issues as to establishing new boundary positions.
- 3.7 The reference to "high quality landscape adjacent to the town" has been introduced via the Neighbourhood Plan. It is disappointing that the Council has not sought to offer context by comparing the Neighbourhood Plan's assessment against its own. Further, any landscape assessment in this general location must be recognised in the context of the undulating local landscape, and that there are significantly more open and sensitive landscape locations in Wareham, including much which is designated as AONB. It has also been demonstrated that for heritage, flood zone and ecological reasons there are no other viable alternatives to extending Wareham than at North Wareham. Moreover, there is no attempt to balance this assessment against the very real need for new homes, the social benefits of development at the site and the national level designations elsewhere in Wareham. It is Welbeck's contention that the benefits of development of the site will inevitably outweigh these locally identified constraints. The matter of the allotments has also been discussed at length with the Town Council, these can be retained or re-provided as necessary. Rather than seeking to meet the indicative 136 dwelling capacity identified in the SHLAA, Welbeck has produced a high quality, sensitive scheme that is landscape led indicating a capacity of around 95 dwellings.
- 3.8 Other matters identified as issues with the site are first, its location "adjacent" to the heathlands and Wareham Forrest protection zone where it must be noted that this is *not* within the protection zone, the public right of way mentioned is from the allotments, and this can be redirected or managed; second, the accessibility of the allotments, which would be provided as part of the development if they were to be moved, and the affect that the allotments might have on a scheduled monument. Welbeck anticipates that this can be mitigated with landscaping and potentially the provision of the SANG; and, third, the potential risk for the adjacent golf course. This is a matter that has not been raised as an issue to date, but nonetheless is something that Welbeck considers can be mitigated.
- 3.9 Turning to the site "west of Bere Road" i.e. that which was to be delivered after the originally proposed Green Belt release in the Purbeck Local Plan. This is reported in SD85 at paragraph 8.16 as follows:
- "The site ...in the green belt, has been progressed through the Wareham Neighbourhood Plan and has community support...however Wareham Neighbourhood Plan has since explored options for delivering their housing allocation at different sites that do not require releasing land from the green belt."*
- 3.10 The above comment illustrates well the continued concerns that Welbeck has with the progress of the Local Plan and NP. At one stage both the Local Plan and NP

suggested that there were exceptional circumstances to review Green Belt boundaries and deliver new homes. Now, in the face of *increased* housing needs, the NP, and not the strategic Local Plan, is directing that this decision should be reversed. Moreover, this decision appears to have been made despite community support.

3.11 Finally, regarding the other options that have been explored at Wareham:

- land at Westminster Road for 30 homes;
- Johns Road for 15 homes;
- the Wareham Middle School site for 90 homes;
- hospital site for 40 homes; and,
- the Gasworks site for 10 homes
- 100 windfall allocation

Welbeck is far from convinced that the sites proposed to be allocated in the Neighbourhood Plan are viable or deliverable; would provide for Affordable Housing needs; would demonstrate sustainable planning; or make good planning for place. These matters are considered later in this submission.

3.12 Welbeck considers therefore that document SD85 demonstrates that the attempts to meet the identified needs are flawed. The two sites at north Wareham should both be allocated to deliver homes that are needed in both the Local Plan and NP. Both sites represent sustainable development that is capable of delivering homes quickly that can be appropriately mitigated. The sites at the industrial estates and former gasworks, which are proposed to be allocated in the Wareham NP, should instead be considered as windfall sites, if they are deliverable at all.

Increasing Housing Numbers to 200 dpa or 228 dpa.

3.13 Notwithstanding the forgoing, should the Inspector be so convinced as the Council that the proposed allocations at Wareham are in fact deliverable then the sites at north Wareham will provide a contribution to the increased housing requirements that would go further to meeting affordable housing need. The constraints that are again quoted at the later parts of document SD85 are in Welbeck's view all capable of being mitigated as explained through previous representations to this Plan, the NP and in discussions with Natural England.

3.14 Development at the north of Wareham can be delivered alongside the retention or relocation of the allotments. Issues about the potential impacts on heathlands and safety issues due to the proximity of the adjacent golf course can also be satisfactorily addressed. The site to the west of Bere Road is capable of being removed from the Green Belt via this plan or a review NP. A suitable HIP/SANG to mitigate for the impacts of this development and the development proposed by the Neighbourhood Plan at Westminster Road and Johns Road to the north of the railway line at North Wareham, can be achieved.

4.0 SD86: PURBECK LOCAL PLAN: REVIEW OF SOURCES OF HOUSING SUPPLY

4.1 Welbeck has very significant concerns about the appropriateness of the proposed allocations, and their deliverability in the Wareham Neighbourhood Plan. This has become of direct relevance to the Local Plan as these sites have now been elevated into Local Plan evidence and the Plan's trajectory. This is reported at section 9:

Revisions to the Housing Supply from the Wareham Neighbourhood Plan. Welbeck has the following concerns and observations about the included sites:

Westminster Road and Johns Road Industrial Estates

- These are protected employment sites in the extant Local Plan and moreover, their exemption from such a designation might be proposed but it has not yet been accepted through the examination or been adopted, and Welbeck has submitted strong evidence and objection to the contrary.
- The clear viability implications of reducing the proposed redevelopment of Westminster Road Industrial Estate from 90 dwellings to 30 dwellings has not been considered by the Council or the Neighbourhood Plan.
- Welbeck has submitted an updated report by its commercial consultant, Vail Williams, which includes recent purchase prices of the industrial units which are considerably in excess of any likely land value achievable with residential development and that both the 90 dwelling and 30 dwelling options are demonstrably not viable even when applying the Neighbourhood Plan's own consultant (Aecom) methodology.
- That part development of an industrial estate is not good planning and place making.
- Notwithstanding our strong representations to the contrary if the Inspector was minded to allow the 30 dwelling allocation that suitable policy wording for the comprehensive redevelopment of the allocation is produced to deter piecemeal development.

Middle School Site / Health Hub

- Welbeck has similar concerns about the Town Council's most recent and revised proposals for the Middle School and Health Hub sites. There is no convincing evidence that these sites are deliverable and viable. There is, again, the strong likelihood that redevelopment costs will adversely affect the provision of affordable housing and other mitigation, and there is also no publically available confirmation that the protected status of the school playing field has been (or can be) extinguished. Even if these matters can be overcome, they will inevitably result in delays to housing delivery.
- There is no evidence that the proposal to increase numbers of homes on the Middle School site has local support. Indeed, there is anecdotal evidence that there is local opposition to this idea. The problem is that without proper consultation and scrutiny there is no way of knowing for sure.
- The proposals for the two sites appear to be increasing the numbers of each site to 45 on H8 and 90 on GS2. This would give an indicative density of 56 and 53 dwellings per hectare. This seems to be an excessively high density, especially given the proximity of heritage assets and their setting, and when the Neighbourhood Plan evidence suggests a capacity of 19 and 41 new homes respectively. Welbeck again, has concerns that this does not represent good planning and place making.

- Welbeck is also not convinced that the types of homes that are suggested – and already have temporary permission – on the Middle School site will meet identified needs. The recently consented scheme provides accommodation for vulnerable adults and is not the market houses necessary to meet the overall target of Purbeck or Wareham. These specialist types of homes are counted ‘on top of’ the overall housing target. This is with reference to the proposed care home at Moreton Station, which was described at the Purbeck Local Plan Examination as in addition to the 490 homes proposed there.

Former Gasworks Site H7

- The boundary of this proposed allocation has now been amended to exclude the auto garage. Given that the auto garage is operating as a going concern Welbeck agrees with this approach. However, the proposed policy still refers to “each” site and it is assumed this means both the gas works and the auto garage.
- The Gasworks site has been vacant for well over 10 years. In that time approval for residential development has been granted and subsequently lapsed. As such, the principle of residential development of the site has been long established but development has not occurred due, most likely, to issues of viability. Given that there is no evidence to suggest otherwise the site should be considered at best as a potential windfall.

Windfall Allowance

- The housing requirement for Wareham appears to be changing to 185 dwellings. This will leave the ‘windfall’ allowance as around 100 windfall dwellings delivered at Wareham.
- Welbeck’s position remains that a windfall allowance of 100 dwellings is too high. This view is especially in light of many of the proposed Neighbourhood Plan sites being those that would usually be considered as windfall, and the continued large windfall allowance being proposed in the Local Plan.
- Welbeck is also concerned that the Town Council’s decision to scrap the provision of a SANG north of the railway line and to artificially cap development in this general location at 45 dwellings will require the full 100 dwelling windfall allowance to be accommodated south of the railway line to ensure cumulative development does not impact Wareham Forest without mitigation. This would bring the windfall in direct conflict with conservation and flood avoidance priorities.

4.2 Welbeck once more submits that a more appropriate figure is to quote the identified capacity of 415 dwellings (reported in SD92) at Wareham. This should comprise Local Plan allocations at north Wareham for about 155 dwellings (60 and 95), which will make a significant contribution towards this figure and help provide potential SANG mitigation to others. The sites proposed for allocation in the NP cannot be included in supply figures because there are significant concerns about their suitability and deliverability. Further work needs to be undertaken to ensure appropriate delivery, which sites are legitimate windfall and which are capable of allocation.

- 4.3 The overall level of windfall and the conflict between policy H8 and windfalls remains a concern, but this issue is returned to hereunder at the Inspector's relevant questions.

5.0 SD87: REVISED FIVE YEAR HOUSING LAND SUPPLY REPORT

- 5.1 The revised five year housing land supply statement continues to have some significant omissions. There are a range of assumptions about the trajectories for proposed allocations and permissions, but limited analysis. The elements of supply at Wareham are questioned above, with other elements included in the five year supply being considered below:

Completions

- 5.2 As the PPG (ID: 68-029-20190722) advises, housing completions are defined as new build dwellings, conversions, changes of use and demolitions and redevelopments. Completion figures should be net, so take into any losses through demolitions. Welbeck accepts the inclusion of 73 homes built in 2018/19.

Detailed Permission

- 5.3 Sites that have detailed planning permission are generally considered to be deliverable, in accordance with the glossary definition included in NPPF. Build out rates for major sites with detailed permission should be informed by information received from developers and analysis of build out rates from developments. This detail for the sites with permission appears to be limited to comments in appendix 2 that refer to the consent process, there is no analysis of local delivery rates.
- 5.4 The delivery of small sites which is assumed to be over the next three or four years, is accepted as a reasonable timeframe for the delivery of small-scale sites.

Outline Permission / Resolution to Grant / Allocation

- 5.5 The NPPF (at Annex 2) states that:

“Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

- 5.6 The PPG (ID: 68-007-20190722) provides further information on what might constitute clear evidence that a site will come forward. This is:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the*

site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;

- *firm progress with site assessment work; or*
- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects*

5.7 The short comment for the outline permission in appendix 2 of SD87 provides little of the above information. Moreover, the emails at appendix 3 include very little detail other than assertions and there is no information about site viability. Again, as with detailed permissions, there is an acceptance of an assumed development trajectory but there is no analysis of this against any locally identified baseline or benchmark, and as such the evidence appears weak.

Specialist Needs for Older People or Disabled People

5.8 PPG includes a specific section for how to identify needs and monitor the delivery of accommodation specifically for older and/or disabled people. The five year land supply statement includes no analysis or monitoring of such needs, or how they might be managed through windfalls. As is noted above in Wareham, there is a specific concern that specific housing types – whilst needed locally – are not likely to be appropriately recorded. It is not clear how the temporary homes on the 'Middle School' site, for example, will be recorded.

6.0 SD92: ADDENDUM TO SUSTAINABILITY APPRAISAL 2019 [SD02]

6.1 At the first week of the Local Plan Examination Hearings the matter of the 'baseline' assessment of settlements and their capacity for growth was raised. In addition, and specifically, the figure for 300 dwellings at Wareham was questioned. Neither the addendum to the Sustainability Appraisal (SA) document SD92, nor the proposed explanation regarding the cited figure for Wareham (document SD62) provide any baseline assessment or relevant evidence for the basis of a settlement hierarchy or a disseminated settlement housing target and spatial strategy.

6.2 The approach taken in both documents SD62 and SD92 is to assess sites and situations as they are presented. There is no assessment of the capacity of service and facilities; no measurement of the capacity of a settlement to change; and no comparison of growth scenarios. There has been no presentation or assessment of information to support the role of a settlement as a 'service centre' how and why it draws people and how any settlement could grow in a sustainable way.

6.3 Some statistics are presented that appear to demonstrate that Wareham, in particular, is a location where there are significant services and facilities and indeed fewer people own cars.

6.4 The lack of a specific reason to reach a settlement housing target or distribution strategy, for example:

- proportional growth compared to the level of services; or
- proportional to the current number of homes; or
- a fixed number for each place at each level of the settlement hierarchy

has led to the vague and ever changing requirement at Wareham. At various stages through the plan making process, Ware has been identified for 500 homes, or 200, or 300, or 185 and in document SD92 that there might be a capacity for 415. An alternative, and more robust approach, would have been to test the above ‘themes’ as a settlement target, to be refined where necessary through an assessment of constraints for a settlement requirement.

6.5 Turning to the identified constraints at Wareham in document SD92, Welbeck contests above that development at north Wareham cannot be mitigated and can demonstrate that a SANG can be delivered, and that the other site specific potential constraints can also be appropriately mitigated. Furthermore, the comment that limited growth would not support improved public transport provision misses the point that there is already a railway station at Wareham and the comments regarding the employment sites have already been countered by Welbeck.

6.6 It is therefore suggested, that a more robust approach to identifying a settlement target for Wareham is to take the 415 figure and seek sites to provide for that figure. This would provide for allocated sites on a range of green and brownfield locations – including those promoted by Welbeck – that can deliver at different paces and viably provide a range of house types and necessary mitigation.

7.0 INSPECTOR’S MATTER E: HOUSING – REVISITED FOR WEDNESDAY 9 OCTOBER HEARING

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?

7.1 Welbeck has little to add to its initial response to this question. However, a more appropriate spatial strategy would be to make a more effective use of settlement hierarchy. This should be to look to a distribution strategy and robust settlement targets to be delivered through a combination of the Local Plan allocations, neighbourhood plan allocations and a smaller amount of windfall.

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?

7.2 Welbeck still has very keen concerns about the delivery of appropriate housing mix across Purbeck. To add to the concerns set out in Welbeck’s first Matter E statement, the selection of sites in Wareham, in particular, and the continued reliance on windfall will not provide for the range of specific needs identified in the SHMA.

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?

7.3 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 propose 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.

- 7.4 Welbeck has little to add to its submitted statement, and the recently submitted information does not change its view. In fact, the selected sites in the Wareham NP illustrate the difficulty of a NP left without a strong strategic direction from the Local Plan. Welbeck remain of the view that its sites should be allocated through the Local Plan to provide strategic housing delivery and indeed security of the SANG, and this can also give the community the opportunity to collect the further evidence necessary to allocate its more ambitious development sites.

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)?

- 7.5 Welbeck remain of the view that the windfall element of the supply is too high. At 809 dwellings this now represents 26% of the supply. The concerns presented in Welbeck's original submissions remain.

- 7.6 Welbeck notes that the recent evidence submission shows that the entire delivery in the last year was windfall. This is alongside the fact that there are extant allocations in Swanage. This imbalance should not be allowed to continue, and further allocations should be made to ensure appropriate delivery of homes, and the types of homes that are needed, where they are needed alongside planned infrastructure. Leaving development to the 'chance' of windfalls is not positive.

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?

- 7.7 Welbeck has nothing to add to its original submissions on this question.

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

- 7.8 Welbeck has nothing to add to its original submissions on this question.

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)?

- 7.9 Welbeck has nothing to add to its original submissions on this question.

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?

7.10 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 sites at Wareham proposed for allocation in the Neighbourhood Plan.

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?

7.11 Welbeck notes the content of document SD87 and the Council’s contention that they can demonstrate 5.32 years’ supply. Welbeck supports the need for a 20% buffer. However, Welbeck has concerns regarding the detail that supports the statement, and indeed the likely housing need target. Therefore two revised five year land supply calculation are 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 20% buffer (d + 101)	1,208 dwellings
f) Requirement per annum (e / 5)	242 dwellings

Total housing supply required (2019-2024)	1,208 dwellings
Annual housing supply required (2019-2024)	242 dwellings

7.12 The council’s assessments as detailed above in this submission can be contested to demonstrate that there is reasonably the capacity to deliver 200 dpa and this would go some way to meeting the affordable housing needs in Purbeck:

a) Local Housing Need 2019-2024 (200 x 5)	1000 dwellings
b) Completions 2018-2019	73 dwellings
c) Shortfall from 2018-2019 (200 – b)	127 dwellings
d) Total (a + c)	1127 dwellings
e) Plus 20% buffer (d + 101)	1,352 dwellings
f) Requirement per annum (e / 5)	270 dwellings

Total housing supply required (2019-2024)	1,352 dwellings
Annual housing supply required (2019-2024)	270 dwellings

7.13 Welbeck considers that there is not sufficient detail submitted to support the outline consent at 6/2015/0687 and so 28 dwellings should be removed from the 5 year supply. Also there is still insufficient evidence to support the inclusion of allocated sites in the supply, therefore 545 dwellings should be removed. The council's assessment has identifies a supply of 1,286 dwellings which are anticipated to be delivered in the period 1 April 2019 to 31 March 2024. Welbeck suggests a total of 713 is more appropriate. Therefore:

$$713 / 1,208 \times 5 = 2.95$$

Or

$$713 / 1352 \times 5 = 2.63$$

7.14 The above calculations suggest that the plan cannot provide for a five year land supply.

8.0 INSPECTOR'S MATTER E: HOUSING – REVISITED FOR THURSDAY 10 OCTOBER HEARING

Issue 1: Housing Allocations

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

8.1 Welbeck did not make submissions to this question for the original hearings. However, if as is identified in MM47, West of Westminster Road is to be allocated for 60 dwellings, Welbeck can confirm that development can be viably delivered on a phased basis. The first 45 dwellings would facilitate a HIP, which can be delivered by first occupation. This considerable green space will be available for both new and existing residents. Natural England's current advice is that developments of around 45 dwellings can simply make financial contributions to mitigate their ecological impact. However, Welbeck is in the position to provide a HIP that will be a genuine community asset. The cumulative impact of the remaining 15 dwellings plus other developments would require a full SANG

8.2 The delivery of a full SANG, however, would require reasonable and proportionate funding from other developments but this is achievable through obligation payments, and its delivery can be phased to match the pace of development completions. If land east of Bere Road was allocated for c95 dwellings this in combination with the 60 dwellings identified as MM47 would lead to the creation of a SANG which would be funded at Welbeck's cost. Depending on the final design of the SANG these two allocations could effectively subsidise some of the other developments in Wareham leading to reduced payment obligations and boosting their delivery credentials.

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?

8.3 Welbeck has nothing to add to its original submissions on this question.

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?

8.4 Welbeck has nothing to add to its original submissions on this question.

9.0 SD93: STRATEGY FOR MITIGATING THE EFFECTS OF NEW HOUSING ON EUROPEAN SITES AND JUSTIFICATION FOR CHANGES TO GREEN BELT BOUNDARIES AT MORDEN

9.1 The production of this document (SD93) does not relate to the reconvened hearings, but Welbeck wishes to make the following observations, specifically regarding the appropriate use of Bog Lane SANG:

9.2 Welbeck has significant concerns about the appropriateness of the choice of Bog Lane as a SANG location to mitigate development in Wareham. Bog Lane is a site of limited accessibility. It is a location that can only practically be reached by car and it is counter intuitive to suggest that it will reduce pressure on sensitive ecological heathland and woodland; nor would it promote sustainable behaviours and attitudes. Bog Lane is also a walk of some 30 minutes from the “middle school” proposed development site, and around 45 minutes from north of Wareham railway station. Moreover, the site is separated from Wareham by the A351 bypass road. Dorset Council has published a Green Belt Mitigation Strategy document as part of the Local Plan Examination [ID: SD93], which includes a usage survey of the existing SANG at Bog Lane. This information demonstrates that the site is not heavily used and the majority of those people who do visit the site do so by car. The survey was carried out over four days and only recorded 30 people on the site in the whole period. 75% of those people surveyed arrived by car. The survey information also demonstrates that the postcodes of visitors are not limited to people living in Wareham. The survey data for Bog Lane seems to suggest that the role of the SANG is that of ‘regional’ or general mitigation. Its role appears to be to divert visitors away from sensitive heath and woodland locations, which means that primarily, it is catering for those people in Wareham who have already made the decision to use their car; it is not attracting people who wish to walk to nearby destinations. Bog Lane may well perform a function as a SANG but it will not be fully effective without additional mitigation closer and more accessible to the residents of Wareham.

9.3 Furthermore, the Bog Lane SANG is in the wrong location to mitigate development in the area of Wareham that Natural England reports as being particularly sensitive i.e. development land in Wareham located north of the railway. Indeed, the latest information suggests that no more than 50 homes can be built north of the railway without mitigation. The Neighbourhood Plan now proposes an allocation of 45 new homes north of the railway on the two industrial estates. This leaves no headroom for further growth; in this regard, the Town Council strategy which relies on infill and windfall development, cannot effectively be mitigated.

- 9.4 A strategy that includes a SANG – or HIP – at north Wareham is necessary to intercept people travelling towards the Wareham Forest or proposing to use the heath – especially those arriving on foot. It would also complement the Bog Lane SANG. Such a strategy has been agreed with the necessary parties and is deliverable as I have set out above. It is therefore very disappointing to see this approach abandoned at this very late stage in the process.

Mayfield House
256 Banbury Road
Oxford
OX2 7DE

T: 01865 511444
F: 01865 310653

Your ref:
Our ref:

Mr Bob Yuille MSc DipTP MRTPI
Examiner: Wareham Neighbourhood Plan
c/o Intelligent Plans and Examinations (IPE) Ltd,
Regency Offices,
37 Gay Street,
Bath
BA1 2NT

By Email enquiries@intelligentplans.co.uk

22nd August 2019

Dear Mr Yuille,

WAREHAM NEIGHBOURHOOD PLAN: SUITABLE ALTERNATIVE NATURAL GREENSPACE & PROPOSED CHANGES TO THE PLAN

Thank you for your letter dated 22nd July. I apologise for the delay in getting back to you but every time I thought I was in a position to finalise my response, the Wareham Town Council made another change to the Plan.

As you know, Welbeck Land ("Welbeck") is promoting land at North Wareham - proposed Policy H4 of the Neighbourhood Plan; and land west of Bere Road. Welbeck is representing the Charborough Estate. Carter Jonas LLP is instructed by Welbeck.

You have asked me for my views on the proposed Suitable Alternative Natural Greenspace (SANG) in the Wareham Neighbourhood Plan. My response is set out below but, whilst writing, I must also comment on the irregular way in which the Town Council is now seeking to modify the Plan, and what I see as the overwhelming case for a hearing (or hearings) to properly consider the Town Council's most recent proposed changes to the Plan.

First though, and in response to the two questions you raised in your letter, I would respond as follows:

Can a SANG at 'North Wareham' be achieved in practice?

Welbeck has long been in discussions with Wareham Town Council, Purbeck District (now Dorset) Council and Natural England. These discussions produced the draft Statement of Common Ground which I shared with you in my previous letter of 19th July.

Welbeck, via the Charborough Estate, controls a significant amount of land around Wareham. The Estate owns thousands of acres within Purbeck including much of the flood zone land that separates north Wareham from "old" Wareham and much of the land north of north Wareham including the golf course and Wareham Forest itself. This extensive ownership provides a rare opportunity to deliver development alongside a SANG on land in the same ownership. The intention is to provide a phased approach to the delivery of appropriate greenspace mitigation.

Natural England has confirmed that the land shown dark green on the attached Plan A has capacity for around 180 dwellings in Wareham. The confirmation from Natural England is also attached herewith. The total dark green area is a series of fields and through discussions with Natural England, Welbeck has considered how this can be delivered on a phased basis. The smallest land-take would provide mitigation for around 45 dwellings

and is known as a “Heathland Infrastructure Project” (HIP). A HIP is akin to a SANG, but on a slightly smaller scale as defined in the Dorset Heathlands Planning Framework Supplementary Planning Document.

At present, or until recently, Welbeck was the beneficiary of a draft allocation for residential development in both the Neighbourhood Plan (via a plan review in Policy H4) and the Purbeck Local Plan (via a proposed Main Modification) for 60 dwellings on land to the west of Westminster Road.

Welbeck’s position is that it would propose a phased approach to the delivery of this allocation, with the provision of a HIP to fully mitigate the initial c45 dwellings. The delivery of the full SANG would mitigate the residual c15 dwellings proposed in Policy H4 and would provide capacity for a further 120 dwellings. The delivery of a full SANG would require reasonable and proportionate funding from other developments but this is achievable through obligation payments, and its delivery can be phased to match the pace of development completions.

Appended to this letter is a plan – Plan A – that shows the land available on Welbeck/Charborough land that can be used for a HIP and a SANG.

A SANG at Wareham is therefore considered to be achievable in practice.

Would a SANG in ‘North Wareham’ be suitable and sufficient to serve proposed WNP allocations H4, H5, H6 and Welbeck’s addition site west of Bere Road?

The total quantum of development from H4 (60 dwellings), H5 (reduced to 30 dwellings), H6 (reduced to 15 dwellings) and Welbeck’s additional site north of Bere Road (circa 100 dwellings) is 195 dwellings. The SANGs indicative capacity is 180 dwellings, which would suggest a slight deficiency. However, Welbeck could increase the SANG size appropriately to provide an additional 15 dwelling capacity. Alternatively, consideration could be given to keeping the allotments in their current position, which would reduce development on the land west of Bere Road by circa 20 dwellings. Additionally, and as reported on various occasions, Welbeck has concerns over the suitability, viability and deliverability of allocations H5 and H6. Should these concerns prove to be well founded, it is unlikely the SANG capacity of 180 dwellings will be breached in any event.

If Welbeck’s sites at H4 and the land north of Bere Road were to be allocated for housing the immediate provision of the full 180 dwelling SANG would be secure and no further payments from the other allocations would be required. The Welbeck sites would be compliant with affordable housing policy and other policy requirements and would provide certainty of delivery.

As you will be aware, the Town Council does not support development on the land north of Bere Road. The Neighbourhood Plan Group Town Council has been working closely with Natural England to progress their proposals which includes recent discussions in which Welbeck has not been included. At present both the Town Council and Natural England object to the development of the land north of Bere Road on the grounds of ecology based on proximity to the Wareham Forrest SPA/SAC. The land north of Bere Road is not within the 400m buffer zone of the forest and is approximately 900-1,000m walk to the nearest receptor. This distance could potentially be lengthened further by the reduction of pedestrian access points, which are provided within Welbeck’s proposed scheme.

Welbeck has suggested that additional land could potentially be added to the 180 capacity SANG to further improve matters and increase capacity but, to date, Natural England has stated that this would not sufficiently mitigate Welbeck’s proposal for housing on the land north of Bere Road. Had this strategy been acceptable, it is likely the additional capacity could have been relied on by other developments without financial contribution.

Welbeck and its ecology advisors disagree with Natural England’s stance on the matter. However, and following the close of the latest round of hearing sessions to the Purbeck Local Plan, Welbeck has been having discussions with the Estate about the potential to create a large strategic SANG. Attached is the latest plan – Plan B – that shows the potential extents of the SANG. Initial capacity checks based on Natural England’s guidance suggest the SANG could have capacity for approaching 1,000 dwellings. The plan shows how land and footpaths can be provided that would be easily accessible – on foot – by the whole community of Wareham, and particularly those who live north of the railway line.

This easy access is particularly important where it would offer an opportunity for people to use green recreational space (to walk dogs for example) that would not require them to drive to a destination by car. However, the SANG would also have car parking facilities to enable it to function as a strategic SANG which would also ‘intercept’ those people in cars heading towards the sensitive Wareham Forest. This would be of

district-wide importance and have influence beyond Wareham. Given the scale of the proposals, appropriate funding from other developments wishing to rely on the SANG would be required.

Having regard to the foregoing, my view is that a SANG suitable and capable of supporting allocations H4, H5, H6, and Welbeck's additional site can be provided.

I turn now to my concerns regarding the recent proposed changes to the Wareham Neighbourhood Plan and the evolving situation with the Purbeck Local Plan. I have four points:

1. The approach to making modifications to the WNP

In the last few weeks – through the Purbeck Local Plan Examination – the Wareham Neighbourhood Plan Steering Group has announced that it intends to make modifications to the Neighbourhood Plan. It transpires that these changes include changing the housing requirement in the Plan, the boundaries and quantum of proposed new homes to be delivered on proposed allocation sites and the removal of Welbeck's land and associated SANG from the Plan. I understand that the Town Council has written to you in this regard.

There appears to have been a complete lack of consultation, or even advanced notification, of these proposed modifications to the Plan. To date, Welbeck has not received any proper notification of these proposed changes. Welbeck has heard, via a third party, that the proposed modifications were published on the Town Council's website on 11th August, this despite the fact that they are dated 1st August. Since then further proposed changes have also been published, dated 15th August. As a land promoter in the designated area (and the beneficiary of a previously proposed allocation) it is very disappointing that Welbeck has not been directly contacted to make comment. Moreover, this approach has not allowed members of the local community to make comments on these proposed material and very significant changes.

This situation serves simply to increase Welbeck's concern (as expressed in Welbeck's response to the Regulation 14 consultation and to the then district council in response to the Regulation 16 consultation) that this Neighbourhood Plan process is fundamentally flawed in terms of its lack of respect for what should be the primacy of the higher order Local plan, one of the purposes of which is to set out the development strategy for the area.

In short, the Neighbourhood Plan is attempting to set its own housing requirement while paying scant regard to the published Local Plan evidence base; a situation that is then compounded by the District Council's attempts to 'retrofit' – via further proposed modifications – its new approach to the Purbeck Local Plan. This approach is contrary to paragraph 65 of the NPPF; and neither is it agreed by the Local Plan Inspector as an appropriate or necessary change to ensure soundness.

2. The newly proposed extension to the SANG at Bog Lane

Welbeck has significant concerns about the appropriateness of the choice of Bog Lane as a SANG location to mitigate development in Wareham.

Bog Lane is a site of limited accessibility. It is a location that can only practically be reached by car and it is counter intuitive to suggest that it will reduce pressure on sensitive ecological heathland and woodland; nor would it promote sustainable behaviours and attitudes. Bog Lane is also a walk of some 30 minutes from the "middle school" proposed development site, and around 45 minutes from north of Wareham railway station. Moreover, the site is separated from Wareham by the A351 bypass road.

Dorset Council has published a Green Belt Mitigation Strategy document as part of the Local Plan Examination [ID: SD93], which includes a usage survey of the existing SANG at Bog Lane. This information demonstrates that the site is not heavily used and the majority of those people who do visit the site do so by car. The survey was carried out over four days and only recorded 30 people on the site in the whole period. 75% of those people surveyed arrived by car. The survey information also demonstrates that the postcodes of visitors are not limited to people living in Wareham. The survey data for Bog Lane seems to suggest that the role of the SANG is that of 'regional' or general mitigation. Its role appears to be to divert visitors away from sensitive heath and woodland locations, which means that primarily, it is catering for those people in Wareham who have already made the decision to use their car; it is not attracting people who wish to walk to nearby destinations. Bog Lane may well perform a function as a SANG but it will not be fully effective without additional mitigation closer and more accessible to the residents of Wareham.

Furthermore, the Bog Lane SANG is in the wrong location to mitigate development in the area of Wareham that Natural England reports as being particularly sensitive i.e. development land in Wareham located north of the railway. Indeed, the latest information suggests that no more than 50 homes can be built north of the railway without mitigation. The Neighbourhood Plan now proposes an allocation of 45 new homes north of the railway on the two industrial estates. This leaves no headroom for further growth; in this regard, the Town Council strategy which relies on infill and windfall development, cannot effectively be mitigated.

A strategy that includes a SANG – or HIP – at north Wareham is necessary to intercept people travelling towards the Wareham Forest or proposing to use the heath – especially those arriving on foot. It would also complement the Bog Lane SANG. Such a strategy has been agreed with the necessary parties and is deliverable as I have set out above. It is therefore very disappointing to see this approach abandoned at this very late stage in the process.

3. Deliverability of sites proposed in the WNP

Part of the suggested justification for the proposed modification to the Neighbourhood Plan is that there is no longer a need to allocate Welbeck's site as the houses are no longer needed. This justification is made in the face of likely increased housing need numbers across Purbeck in the Local Plan and a recently published document [SD92: Addendum to Sustainability Appraisal 2019] that indicates a potential capacity for 415 new homes in Wareham.

Moreover, Welbeck is far from convinced that the sites proposed to be allocated in the Neighbourhood Plan are viable or deliverable; would provide for Affordable Housing needs; would demonstrate sustainable planning; or make good planning for place. Some of these points have already been made by Welbeck, but the continued reliance on these sites, their elevation into Local Plan evidence through the recent examination documents, and the change to the "Middle School" site, necessitates a further review of the situation.

Westminster Road and Johns Road Industrial Estates

- Welbeck endorses your concern that these are protected employment sites in the extant Local Plan and moreover, their exemption from such a designation might be proposed in the emerging Local Plan but it has not yet been accepted through the examination or been adopted.
- Welbeck's evidence (and that produced for the Councils by Aecom) suggests that redevelopment of the entirety of each industrial estate would be only marginally viable and this would undoubtedly adversely affect the delivery of Affordable Housing, but also contributions towards SANG and other mitigations strategies. Furthermore, if each industrial estate is now only going to provide a limited level of development then the likelihood is that the marginal viability will turn to non-viability. Welbeck has requested its commercial consultant, Vail Williams, to comment on these proposed changes.
- The now suggested allocation of development on part of each industrial estate is not good planning and place making.

Middle School Site / Health Hub

- Welbeck has similar concerns about the Town Council's most recent and revised proposals for the Middle School and Health Hub sites. There is no convincing evidence that these sites are deliverable and viable. There is, again the strong likelihood that redevelopment costs will adversely affect the provision of affordable housing and other mitigation, and there is also no publically available confirmation that the protected status of the school playing field has been (or can be) extinguished. Even if these matters can be overcome, they will inevitably result in delays to housing delivery.
- There is no evidence that the proposal to increase numbers of homes on the Middle School site has local support. Indeed, there is anecdotal evidence that there is local opposition to this idea. The problem is that without proper consultation and scrutiny there is no way of knowing for sure.
- The proposals for the two sites appear to be increasing the numbers of each site to 45 on H8 and 90 on GS2. This would give an indicative density of 56 and 53 dwellings per hectare. This seems to be an excessively high density, especially given the proximity of heritage assets and their setting, and when the Neighbourhood Plan evidence suggests a capacity of 19 and 41 new homes respectively. Welbeck again, has concerns that this does not represent good planning and place making.

- Welbeck is also not convinced that the types of homes that are suggested – and already have temporary permission – on the Middle School site will meet identified needs. The recently consented scheme provides accommodation for vulnerable adults and is not the market houses necessary to meet the overall target of Purbeck or Wareham. These specialist types of homes are counted ‘on top of’ the overall housing target. This is with reference to the proposed care home at Moreton Station, which was described at the Purbeck Local Plan Examination as *in addition* to the 470 homes proposed there.

Former Gasworks Site H7

- The boundary of this proposed allocation has now been amended to exclude the auto garage. Given that the auto garage is operating as a going concern Welbeck agrees with this approach. However, the proposed policy still refers to “each” site and it is assumed this means both the gas works and the auto garage.
- The Gasworks site has been vacant for well over 10 years. In that time approval for residential development has been granted and subsequently lapsed. As such, the principle of residential development of the site has been long established but development has not occurred due, most likely, to issues of viability. Given that there is no evidence to suggest otherwise the site should be considered at best as a potential windfall.

Windfall Allowance

- The housing requirement for Wareham appears to be changing to 185 dwellings. This will leave the ‘windfall’ allowance as an undefined amount, although such an allowance is still referenced in the Neighbourhood Plan. In the absence of any alternative figure, Welbeck assumes that there is a continued expectation that there will be around 100 windfall dwellings delivered at Wareham.
- Welbeck’s position remains that a windfall allowance of 100 dwellings is too high. This view is especially in light of many of the proposed Neighbourhood Plan sites being those that would usually be considered as windfall, and the already large windfall allowance being proposed in the Local Plan.
- Welbeck is also concerned that the Town Council’s decision to scrap the provision of a SANG north of the railway line and to artificially cap development in this general location at 45 dwellings will require the full 100 dwelling windfall allowance to be accommodated south of the railway line to ensure cumulative development does not impact Wareham Forest without mitigation. This would bring the windfall in direct conflict with conservation and flood avoidance priorities.

4. Current situation of the Local Plan Examination

During the Purbeck Local Plan Examination – in the intervening weeks between hearings – Dorset Council produced a raft of new supporting information upon which the Inspector has sought written responses by 9th September.

Some of these matters – SANG provision and housing supply – are directly relevant to the Wareham Neighbourhood Plan. Welbeck is in the process of reviewing the Dorset Council documentation and drafting written submissions. I would be happy to share these with you in due course. The continued protracted nature of the Purbeck Examination means that the strategic basis of the WNP is not certain and the most appropriate course of action is to pause the Neighbourhood Plan process and to await the outcome of the Local Plan Examination

The undeliverable nature of the sites proposed for allocation in the Neighbourhood Plan (both as submitted and “amended”), the likely ineffectiveness of the proposed SANG and the continued uncertainty that surrounds the Purbeck Local Plan, which is still at Examination, all point towards the critical need for a hearing in respect of this Wareham Neighbourhood Plan. There are significant and complex issues and concerns that need to be properly discussed before robust conclusions to be drawn as to the effectiveness of the Neighbourhood Plan and whether or not it meets the basic conditions and is capable of being ‘made’.

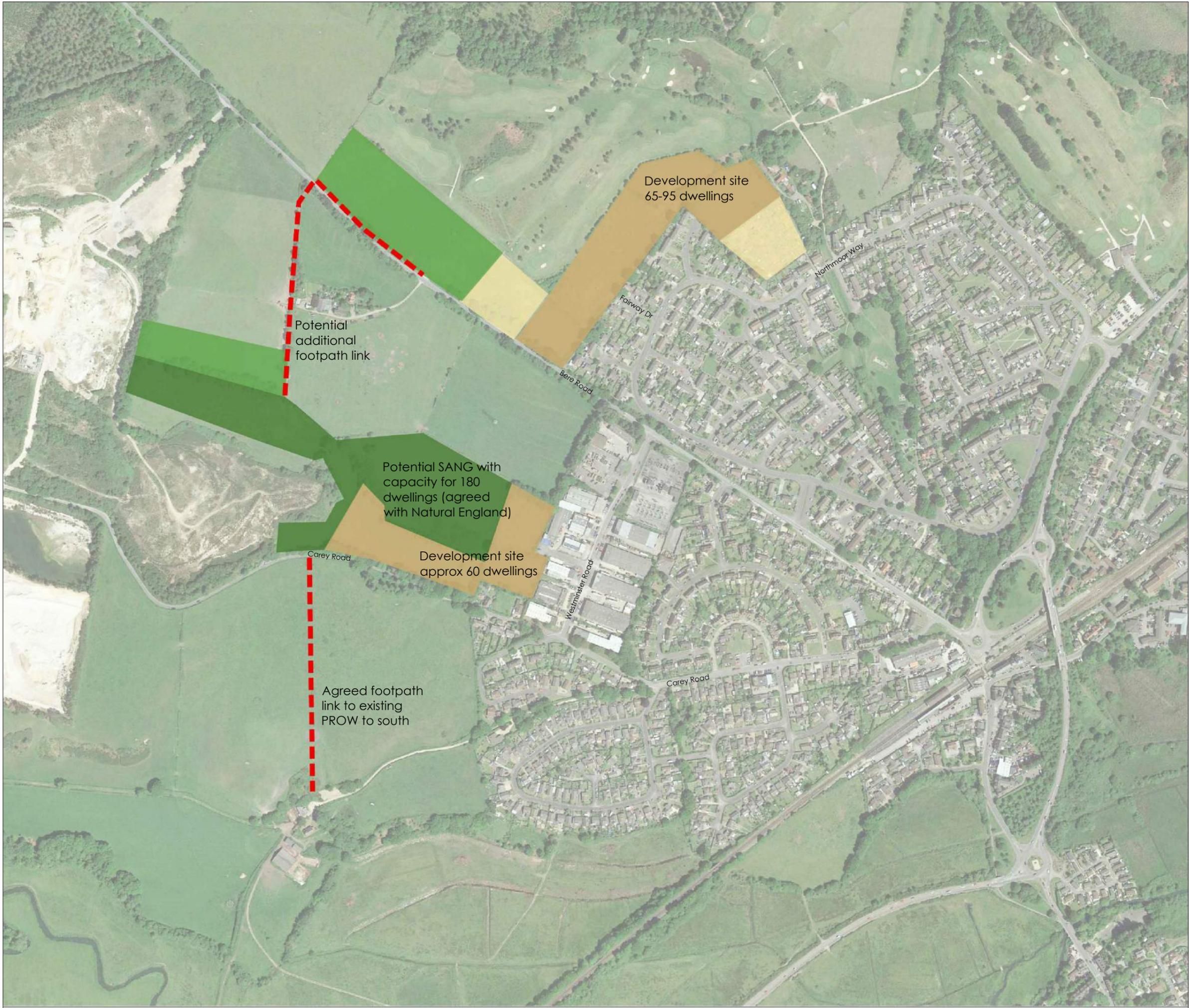
Accordingly, I respectfully ask that you pause the Neighbourhood Plan pending further progress on the Local Plan and that you also agree to hold a hearing on the Neighbourhood Plan at which the matters raised above can be properly considered.

Yours sincerely



Steven Sensecall MRTPI
Partner – Head of Planning South and South West

E: Steven.Sensecall@carterjonas.co.uk
T: 01865 297705
M: 07970 796762



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- Key:**
- Existing allotments and potential new location of allotments if moved
 - Proposed SANG
 - Potential additional SANG land
 - Footpaths links

PLAN A

-	24.07.19		NZ	AB
Rev	Date	Description	Drawn	Chkd
Client				
Welbeck Land II LLP				



Project
Wareham and Sandford

Drawing Title
Wareham - SANG

Drawing No. **901** Job Ref. **18.2003**

Scale @ A3 **1:5000** Revision **-**

Scale Bar

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23/10/2018

Heathland mitigation requirements, Land North of Wareham

Note: Natural England advise that the site under consideration does have a number of outstanding natural features, well developed mature standard oaks and wide oak dominated verges. Existing areas of priority habitat, acid grassland and a varied topography with very good views to the south towards the AONB, Purbeck Ridge and Corfe Castle. These attributes are afforded positive weight in the considerations as is the ready access on foot enabled by the greenspace location.

Area 1. pSANG 3.3ha
Area 2. pSANG 0.68ha
Area 4. pSANG 0.65ha
Area 5. pSANG 1.18ha

New circular routes established 1.6, 2 and 2.3km circular routes

The SANG capacity is assessed using an additional population per ha figure which is between 8 and 16ha/1000 and takes account of the natural features as well as the location in relation to development and the designated sites and a professional judgement about the balance between these attributes and the other measurable SANG criteria which is the length of path available. It is my view that this allows for certainty because of the absence of public access and the natural attributes whilst still allowing for flexibility in reviewing future use.

Option 1.

40 units as a standalone application, Natural England advise that, as this falls at the lowest end of the number of units threshold for SANG it would be acceptable to provide Area 1 as a natural greenspace although this would not represent a functional SANG. For this reason the developer would need to secure a HIPs (the identified land) as well as SAMM contribution.

Option 2.

55 units, this would require a SANG on its own, Natural England advise that the Area 1. does not meet the distance walked criteria and in addition the area of 3.3ha is well below that accepted by Natural England at other similar sized developments in Purbeck eg Policemans Lane. Natural England advise that the addition of Area 2 would enhance the SANG substantially such that, combined with the establishment of a new footpath (442m) linking to the south (spec and precise route to be agreed) the mitigation would be considered effective. It will provide both an adequate area with good natural quality as

well as variety such that the use can be at capacity without the area being considered “busy”, the addition of the footpath provides additional capacity and a variety of route lengths for new and existing users.

Natural England have reviewed likely capacity for this option and conclude that with Area 2 and the new RoW the capacity could reasonably be an additional 65 units.

Option 3.

SANG Areas 1-5 (c. 5.81ha) and footpath, Natural England advise that this option would provide an initial capacity of c.200 units. It would be likely that this could be increased with the addition of some infrastructure such as cycle racks, more car parking capacity a dog dip pond etc.

Natural England advise that the approach favoured is one which will deliver the necessary SANG capacity for the proposed development (55 units) but which additionally demonstrates that the allocation set out in the neighbourhood plan at Westminster Ind Est can be commenced in a material way with minimal restrictions due to heathland mitigation requirements. The agreement about Areas 4 and 5 provides the option of enabling the full indicative Westminster Est allocation should this come forward or alternatively providing capacity for other developments coming forward in Wareham.

Should the Westminster Ind Est not secure SANG at the Neighbourhood Plan stage it is likely that the release of Green Belt land would become more difficult as other locations in the District are reviewed as alternatives.

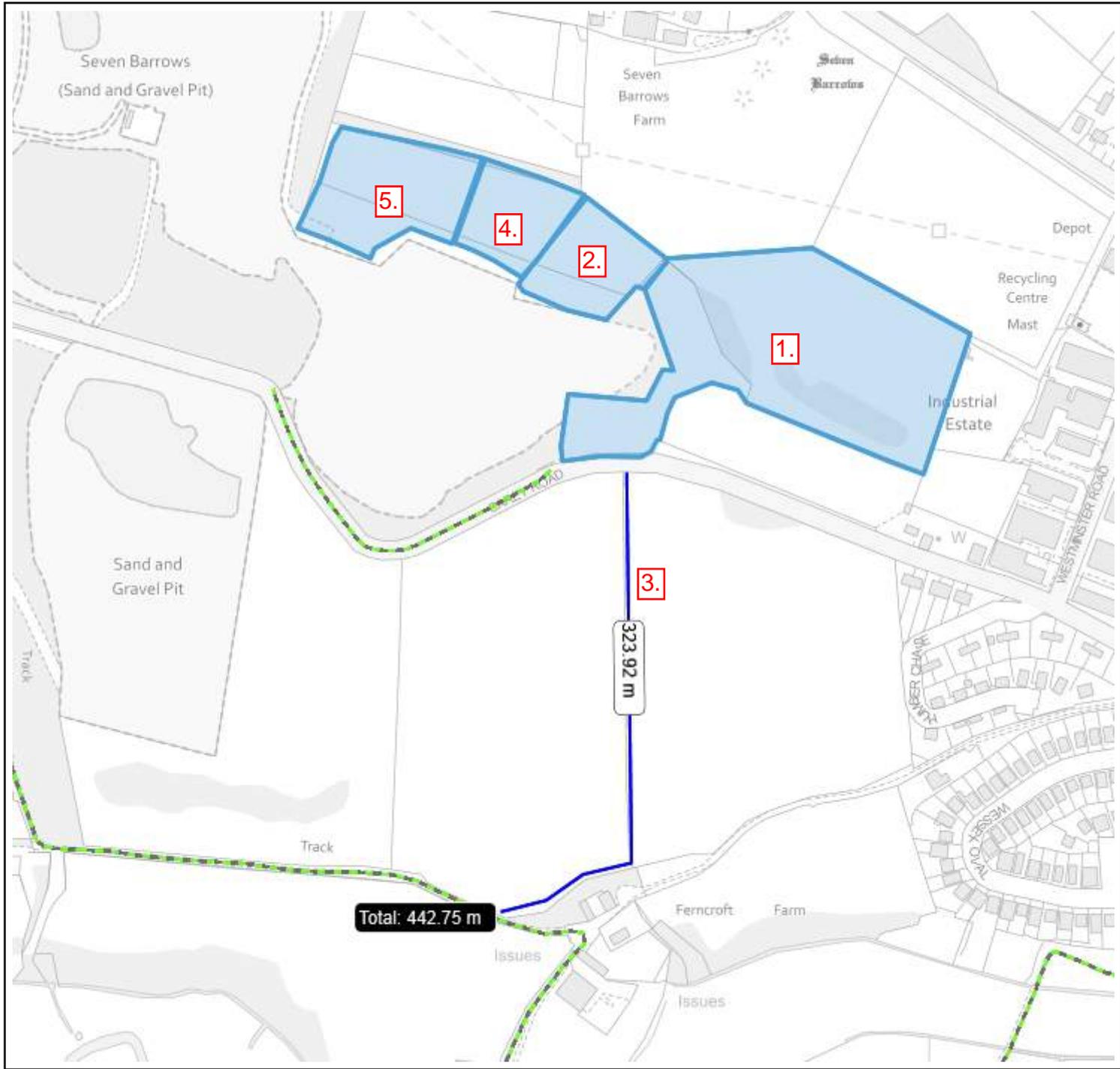
Natural England would always advise that SANGs are monitored to review visitor capacity over time and where it is shown that there is additional capacity this will be made available for use by other developers or via the authority to the benefit of the landowner. As a guide Natural England place weight on the 1 person/ha/hour level of visitor access as an indication of busyness of the site.

Nitrogen neutrality

55 units with SANG, option 2 with 3.98ha SANG would have about 1 house spare capacity

40units with 3.3ha HIP would have a little over 1 unit but not more than 2 extra capacity.

Nick Squirrell
Conservation and Planning Lead Advisor
Dorset, Hampshire and Isle of Wight Area Team
Natural England
Mob: 07766 133697
Email nick.squirrell@naturalengland.org.uk



North of Wareham

Key

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- Footpath
- Bridleways
- Restricted Byways
- Byways open to all traffic
- Unknown

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 Map Projection: British National Grid
 Map Scale at A4: 1:4,734

North of Wareham

Key

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-  Footpath
-  Bridleways
-  Restricted Byways
-  Byways open to all traffic
-  Unknown



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Map Produced from WebMap2 on 23/10/18

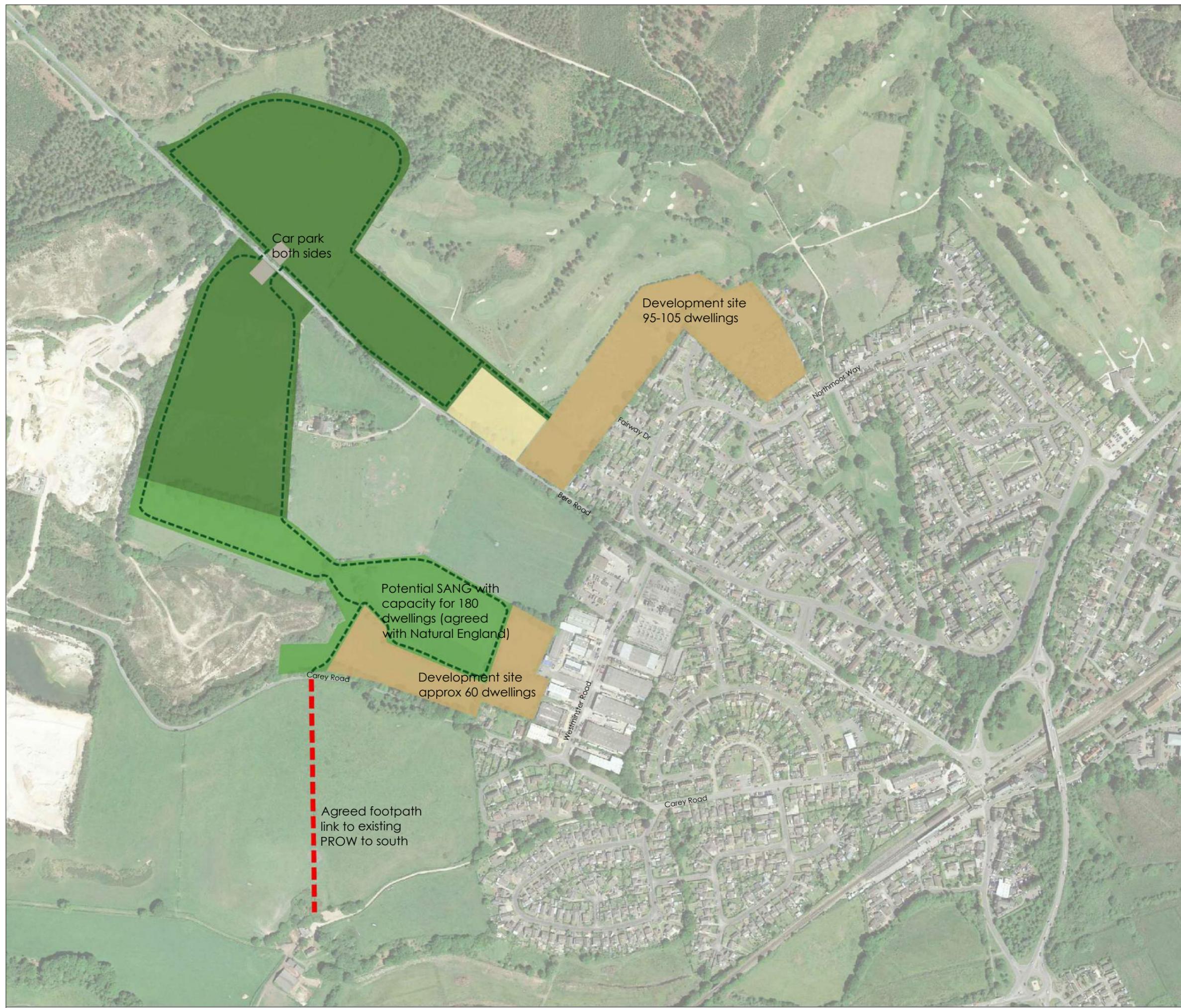
Map Projection: British National Grid

Map Scale at A4: 1:4,734

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Do not scale from this drawing. All contractors must visit the site and be responsible for taking and checking Dimensions.

- Key:**
- New allotments
 - Proposed SANG
 - Potential additional SANG land
 - Potential car park
 - Footpath link
 - Indicative perimeter SANG walk walk of c. 3.4 km



PLAN B

Rev	Date	Description	Drawn	Chkd
A	19.08.19	Revision - SANG	NZ	AB
-	24.07.19		NZ	AB

Client
 Welbeck Land II LLP

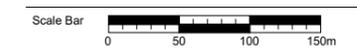


Project
 Wareham and Sandford

Drawing Title
 Wareham - SANG

Drawing No. 901 Job Ref. 18.2003

Scale @ A3 1:5000 Revision A



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Report

Westminster Road Industrial Estate Wareham Dorset

Report date: 5 September 2019

Prepared for:
Welbeck Strategic Land II Limited
Woodstock Studios
13 Woodstock Street
London W1C 2AG

Prepared by:
Gary Jeffries
Partner and LLP Member
M: 07976 397698
E: gjeffries@vailwilliams.com



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Appendix 1	BCIS Build Costs
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1 Scope of Instruction

- 1.1. Vail Williams are instructed by Welbeck Land to provide a further report on Westminster Road Industrial Estate (“WRIE”), following advice provided in May and November 2018. This report provides:
- An update on the current situation in terms of ownership/occupation at WRIE and a review of the vitality/longevity of the Estate.
 - A review of the Wareham Neighbourhood Plan (WNP) Viability Study dated May 2018, prepared by Aecom (“the Aecom Viability Report”), with particular reference to their conclusions on WRIE.
 - Comment upon the impact on the viability of redevelopment of WRIE, following WNP group’s recent decision to reduce the quantum of development from 90 dwellings to 30 dwellings.

2 Setting the Scene

- 2.1. In May 2018 Vail Williams LLP produced a document entitled “Report on the Long Term Future of the Westminster Road Industrial Estate” which provided advice on the longevity of the estate following the recent changes in the ownership structures of the buildings on WRIE, after the relocation of Daler Rowney. It is understood that a redacted version of this document was supplied at the time to the Wareham Neighbourhood Plan Steering Group and Purbeck District Council.
- 2.2. In addition, Vail Williams advised Daler Rowney on the disposal of 16/17 WRIE, which was sold to Purbeck Ice Cream in June 2018, after a short period of marketing. As such Vail Williams has a good recent working knowledge of WRIE.
- 2.3. Our 2018 report examined the ownership structure on the estate, advised on the local supply in the industrial property market, the anticipated rental and capital values, and analysed feedback from questionnaires sent to the occupiers of the estate during March to April 2018.
- 2.4. The report concluded that many of the occupiers on the estate owned the freehold interest in their buildings and had plans to remain on the estate in the medium to long term.
- 2.5. We undertook a high-level financial appraisal which examined the potential redevelopment of the site for residential use. Based on the stated assumptions in our May 2018 report, this appraisal suggested that a future redevelopment of the site for residential purposes would not be viable.
- 2.6. The table below shows the current ownership at WRIE, several of the buildings having been purchased for occupation since mid-2017.

Building	Owner	Purchase Terms
Unit 1	Purbeck Ice Cream	May 2013 purchase at £506,400 (equivalent to £1,950,000 per hectare)
Units 2 and 3	MJ Properties (Bournemouth) Limited	October 2017 purchase at £700,000, subject to the residue of Daler Rowney’s lease to 2022. Purchase price is equivalent to £2m per hectare.

Units 4 and 5	Polar Holdings	November 2017 acquisition at £665,000 (equivalent to £1,900,000 per hectare).
Unit 6	Evo Design	June 2018 purchase at £440,000 (equivalent to £2,588,000 per hectare)
Unit 7	National Tube Straightening Company	October 2017 purchase at £440,000 (equivalent to £2,444,000 per hectare).
Unit 8	Sita Waste	
Units 9 and 10	Westminster Wire Factory Limited	1999 purchase; no price information.
Unit 12	Stephen Grundy Limited (let to Chococo Limited)	September 2011 purchase; no price information. Lease expiry in August 2020.
Units 13	Westminster Wire Factory Limited	October 2006 purchase at £230,000 (£2,555,000 per hectare).
Unit 14	Tower Pension Trustees Limited	September 2018 purchase at £310,000 (equivalent to £3,100,000 per hectare).
Unit 15	Rowanmoor Trustees Limited	October 2007 purchase; no price information. Let to Olympia Triumph Manufacturing Limited.
Units 16 and 17	Purbeck Ice Cream (Crazy Cow Limited)	June 2018 purchase at £540,000 (equivalent to £2,250,000 per hectare)
Unit 18	Eaton Stonemasons	April 2017 purchase at £435,000 (equivalent to £2,558,000 per hectare).

- 2.7. Most of the buildings are owner-occupied, either directly or through self-invested pension arrangements. The table provides an analysis of the purchase prices (where known) on a per net hectare basis for comparison with the EUV+ benchmark in the Aecom Viability Report, which is considered in Section 4 below.
- 2.8. The continued flow of recent transactions, and the prices paid, reflects strong demand for existing industrial buildings for occupation in this location; indeed, our experience with the sale of Units 16/17, for example, was that terms were agreed within six weeks of the start of our marketing campaign. A level of vacancy on industrial estates of this nature is expected, as businesses evolve, but this does not suggest that the long-term longevity or usefulness of the estate is in some way compromised.

3 Review of the Aecom Viability Report

- 3.1. We have considered the Aecom Viability Report in detail, having particular regard to the modelling assumptions (Aecom's Section 4) and the application of these assumptions to the modelled sites. We have no issue with most of the modelling assumptions, the majority of which are within the established range of market norms for viability matters. We do have fundamental concerns, however, over Aecom's conclusion that the comprehensive redevelopment for 90 dwellings is achievable; in our opinion Aecom's core assumption on 'EUV+' is flawed when applied to WRIE and we also identify issues with the assumptions on pricing and build costs.
- 3.2. We deal with these points below:

3.3. Comprehensive Redevelopment

- 3.3.1. As identified in the table in Section 2 of this report, WRIE is in multiple ownership. Many of the owner/occupiers express a desire not to redevelop the site for residential purposes and wish to continue to occupy their buildings for business purposes. As a consequence, the probability of a comprehensive redevelopment of the estate for 90 dwellings, as envisaged in the Aecom report, is considered highly unlikely.
- 3.3.2. This concern appears to have been accepted by the WNP group who are now proposing to reduce the Neighbourhood Plan allocation from 90 to 30 dwellings. The proposed allocation area for the 30 dwellings covers four separate titles, as shown on the plan below, three of which have been purchased by the various owners since April 2017. The total prices paid for these four titles is £2,181,400, which is more than double the land value modelled by Aecom for the 90 unit scheme. Aecom's appraisals (p54-58) provide an analysis of land values which do not exceed £52,000 per Open Market home; on this basis, the land value of even a wholly Open Market 30 unit scheme would not exceed £1,560,000 – much less than the EUV evidence of prices paid.



- 3.3.3. Comprehensive redevelopment of the reduced allocation is still considered unlikely and has not been demonstrated. Whilst two of the titles are in the same ownership they are not physically connected and could not be jointly developed.

3.4. EUV+

- 3.4.1. At paragraph 4.17.12, Aecom note *“on the basis of the evidence available it is considered that £500,000 per net hectare for greenfield sites and £750,000 per net hectare for brownfield/industrial sites is a reasonable assumption for EUV+ for Wareham”*.
- 3.4.2. Taking £750,000 per net hectare as the viability threshold, Aecom conclude at their paragraphs 7.1.8 and 7.1.9 that, on the basis of a comprehensive 90 dwelling redevelopment, WRIE is not viable for the delivery of 40% affordable housing but marginally viable for the delivery of 30% affordable housing.
- 3.4.3. However, Aecom's analysis does not have regard to the market evidence of actual sales at WRIE, which all clearly reflect the Existing Use Values of the land and buildings. A total of seven sales have completed since October 2017 on WRIE with prices ranging from £1,900,000 per hectare to £3,100,000 per net hectare (see the table in Section 2 above.)

- 3.4.4. We agree with Aecom’s assertion at their paragraph 4.17.1 that, for land to be released for development, the premium over EUV needs to be sufficiently large to provide an incentive to release the site. At paragraph 4.17.2 Aecom note that, nationally, a typical premium over EUV would be 20%-30% to incentivise an owner to release land for development. Applying this premium to the evidence of actual EUV transactions at WRIE indicates that the absolute minimum threshold against which to assess to viability should be £2,280,000 per net hectare.
- 3.4.5. Aecom’s residual land value for WRIE at 40% affordable housing is £427,266 per net hectare and at 30% affordable housing is £715,591 per net hectare – both figures are very significantly below our evidence-based minimum EUV+ threshold of £2,280,000 per hectare. It is therefore clear that, on the basis of actual market evidence on WRIE, the site is demonstrably not viable for residential development at all.

3.5. Market Research and Price Assumptions

- 3.5.1. At paragraph 3.6.3 and Table 4, Aecom adopt the following price assumptions for houses and flats:

3.5.2. Aecom’s Market Housing Price Assumptions

Type	Price per Sq m	M ²	Price per Unit
One bedroom flat	£4,400	50 sq m	£220,000
Two bedroom flat	£4,400	70 sq m	£308,000
Two bedroom house	£3,500	85 sq m	£297,500
Three bedroom house	£3,500	100 sq m	£350,000
Four bedroom house	£3,500	130 sq m	£455,000

- 3.5.3. In our experience, in a location such as Wareham, it is highly unlikely that a 70 sq m two bedroom flat would sell for more than an 85 sq m two bedroom house. Aecom’s market analysis has been distorted by:

- The inclusion of retirement housing in their analysis, which typically commands a premium to market housing.
- The inclusion of prime waterfront apartments in Poole and Swanage in their analysis, which are not comparable locations to Wareham.

- 3.5.4. Correcting for this error, based on the assumed mix of market housing noted in Aecom’s paragraph 5.1.3 (if, say, half the two bedroom units are assumed to be flats), would reduce the assumed gross development value (GDV) of the scheme by approximately £250,000. Although this reduction in GDV of only 1.5% appears very modest in the context of an assumed open market sales revenue for the scheme overall of £17.5m (see Aecom’s appendix D, page 55), viability appraisals are highly sensitive to very small changes in the key input variables, such as price and build costs. The mechanics of development appraisal methodology are such that the reduction in assumed sales revenue would represent a direct reduction in underlying land value; in the appraisal on page 55 of the Aecom Viability Report, the land value would be reduced to around £750,000.

3.6. Build Costs

- 3.6.1. Construction cost figures in the Aecom Viability Report have been drawn from the Building Cost Information Service (BCIS), using median costs for new build housing, rebased to Purbeck (see Aecom’s paragraph 4.3.1). The assumed base build rates are £1,166 per sq m for houses and £1,379 per sq m for flats.
- 3.6.2. BCIS allows for different cut off points in its datasets. We note in Aecom’s report that the “default period” setting is used, which draws upon tender price evidence submitted over the previous 15 years. This dataset therefore includes projects delivered under a different regulatory regime to the current Building Regulations. Consequently, it is common practice in viability matters to limit the BCIS data to the latest five year period, as projects tendered and constructed in this period will be the most representative of the costs of delivering to the current regulatory and best practice regime.
- 3.6.3. The five year BCIS data for Purbeck is included in Appendix 1 to this report. For two storey estate housing, the median rate is actually very slightly lower than that adopted by Aecom at £1,153 per sq m. However, noting that 10% of the housing mix assumed for WRIE are four bedroom units, the median cost of detached housing (four bedroom housing is often detached) is £1,644 per sq m, compared to the £1,166 per sq m adopted in Aecom’s appraisal.
- 3.6.4. We estimate that the additional base build costs of delivering the assumed nine detached houses on WRIE would be in the region of £525,000 (5 x 4 bedroom market houses at 130 sq m per house and 4 affordable 4 bedroom houses at 112 sq m per house, at an increased build cost per unit of £478 per sq m). Again, owing to the mechanics of viability appraisals, this increase in costs would be a direct deduction from the assumed land price.
- 3.6.5. The combination of lower assumed sales revenues for the market housing and higher build costs would serve to reduce the land value of WRIE to around £250,000 overall (£105,000 per net hectare), further increasing the viability gap.
- 3.6.6. Our findings are summarised in the table below:

Site	VW Evidence-based EUV+ (per net hectare)	Aecom Residual Value (per net hectare)	VW Residual Value corrected for price assumption (per net hectare)	VW Residual Value corrected for price & build cost assumptions (per net hectare)
H5 WRIE (40%)	£2,280,000	£427,266	£317,796	£105,932
H5 WRIE (30%)	£2,280,000	£715,591	<£700,000 Not modelled as EUV+ not exceeded by Aecom Residual Value	<£600,000 Not modelled as EUV+ not exceeded by Aecom Residual Value

- 3.6.7. **Neither the Aecom not VW Residual Values exceed the EUV+. As such, the site should not be considered developable during the plan period.**

3.7. Conclusions

- 3.7.1. Based on the foregoing, we are of the opinion that the redevelopment of WRIE for housing is not viable, either for the originally proposed scheme of 90 dwellings, or the revised proposal of 30 dwellings on part of the estate. In connection with the revised proposal, our research evidences that the total prices paid since April 2017, on an Existing Use Value basis, for the four land parcels required for the 30 unit scheme is £2,181,400; this is more than double the land value modelled by Aecom for the 90 unit scheme.
- 3.7.2. We conclude that the proposals are not viable even with lower affordable housing contributions and it is unrealistic to assume that WRIE would be developable over the plan period.
- 3.7.3. WRIE has continued to attract strong demand from owner-occupiers, with the evidence of seven sales in the last two years; as such, the estate continues to make a positive contribution to the supply of industrial property in Wareham.

Description		Address
Contact	Gary Jeffries	
Signed		Vail Williams Lakeside North Harbour Portsmouth PO6 3EN
Contact Number	07976 397698	
Email	gjeffries@vailwilliams.com	Tel: 023 9220 3200
Date	5 September 2019	

Appendix 1

BCIS Build Costs

The results contained on the page are as published on 01-Jun-2018

£/m² study

Description: Rate per m² gross internal floor area for the building Cost including prelims.

Last updated: 26-May-2018 00:20

› Rebased to Purbeck (101; sample 7)

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810.1 Estate housing							
Generally (15)	1,227	596	1,050	1,190	1,351	4,141	1806
Single storey (15)	1,375	700	1,178	1,319	1,557	4,141	294
2-storey (15)	1,193	596	1,039	1,166	1,305	2,353	1372
3-storey (15)	1,214	772	980	1,165	1,368	2,480	136
4-storey or above (15)	2,400	1,300	-	2,194	-	3,909	4
810.11 Estate housing detached (15)	1,568	932	1,205	1,390	1,626	4,141	20
810.12 Estate housing semi detached							
Generally (15)	1,222	612	1,057	1,192	1,344	2,296	424
Single storey (15)	1,399	855	1,203	1,372	1,554	2,296	76
2-storey (15)	1,188	612	1,051	1,160	1,312	2,096	328
3-storey (15)	1,115	829	929	1,061	1,205	1,791	20
810.13 Estate housing terraced							
Generally (15)	1,249	596	1,050	1,196	1,391	3,909	386
Single storey (15)	1,377	944	1,158	1,309	1,595	2,034	45
2-storey (15)	1,223	596	1,047	1,189	1,355	2,353	281
3-storey (15)	1,228	788	980	1,138	1,320	2,480	59
4-storey or above (5)	3,909	-	-	-	-	-	1
816. Flats (apartments)							
Generally (15)	1,451	719	1,214	1,384	1,637	4,902	961
1-2 storey (15)	1,377	842	1,173	1,325	1,520	2,604	236
3-5 storey (15)	1,432	719	1,207	1,379	1,633	2,816	640
6+ storey (15)	1,809	1,064	1,475	1,760	1,920	4,902	82

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Our offices:

Birmingham

Edmund House
12-22 Newhall Street
Birmingham
B3 3EF
T: +44 (0)121 654 1065

Crawley

Unit 4 Peveril Court
6-8 London Road
Crawley
West Sussex
RH10 8JE
T: +44 (0)1293 612600

Woking

One Crown Square
Woking
Surrey
GU21 6HR
T: +44 (0)1483 446800

Heathrow

450 Bath Road
West Drayton
Heathrow
UB7 0EB
T: +44 (0)20 8564 8300

London

Dover House
34 Dover Street
London
W1S 4NG
T: +44 (0)20 3589 0050

Portsmouth

Lakeside North Harbour
Western Road
Portsmouth
PO6 3EN
T: +44 (0)23 9220 3200

Reading

550 Thames Valley Park Drive
Reading
RG6 1PT
T: +44 (0)118 909 7400

Southampton

Savannah House
3 Ocean Way
Southampton
SO14 3TJ
T: +44 (0)23 8082 0900

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www.vailwilliams.com

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Regulated by RICS

Miss Helen Nolan
Programme Officer
Purbeck Local Plan 2019
Dorset Council Offices
Westport House
Worgret Road
Wareham
Dorset
BH20 4PP

SENT BY POST AND EMAIL TO
plp.programmeofficer@dorsetcouncil.gov.uk

9 September 2019

Dear Sir / Madam

PURBECK LOCAL PLAN EXAMINATION – COMMENTS ON COUNCIL'S NEW EVIDENCE

Introduction

The Home Builders Federation (HBF) is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations on the Council's new supporting evidence and further proposed main modifications.

Local Housing Need (LHN)

The Council's updated calculation of LHN using the standard methodology is set out in Document SD85 : Housing Need. The HBF agree that for Purbeck the uncapped LHN figure is 185 dwellings per annum and the capped LHN figure is 180 dwellings per annum between 2018 – 2034.

Use of the capped or uncapped LHN figure

It is noted that the National Planning Practice Guidance (NPPG) states that the application of a cap does not reduce housing need itself. Strategic policies adopted with a cap applied may require early review to ensure that any housing need above the capped level is planned for as soon as reasonably possible. Where the minimum annual LHN figure is subject to a cap consideration can still be given to whether a higher level of housing need could be realistically delivered to remove the necessity for an early review (ID : 2a-007-20190220).

In Document SD85 Table 2 shows that the Council's revised housing land supply (HLS) of 3,062 dwellings exceeds the updated capped LHN figure of 180



dwellings per annum (2,880 dwellings) by 182 dwellings and Table 3 shows that the overall HLS could meet the uncapped LHN figure of 185 dwellings per annum (2,960 dwellings) with a surplus of 102 dwellings. The Council also state that a housing requirement based on the updated uncapped LHN figure has no implications for the spatial strategy in the Local Plan because the figure could be met from the revised sources of HLS identified (see para 4.3 of Document SD85). The HBF have identified An inconsistency between the figures set out in Tables 2 & 3 of Document SD85 and Table 1 of Document SD86 also replicated in **MM47** of Document SD14 which shows an overall HLS of 3,122 dwellings resulting in a greater headroom between the capped or uncapped housing requirement and HLS of 242 dwellings and 162 dwellings respectively. The Council should confirm which HLS figure is correct. It is the HBF's contention that the uncapped LHN figure should be used.

Uplift for affordable housing need

As discussed during the July Examination Hearings the HBF together with other participants also consider that there is a case for a higher housing requirement above LHN to assist in delivering affordable housing. The need for affordable housing in Purbeck is significant. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures may be considered where it could help deliver affordable housing (ID : 2a-024-20190220).

Misalignment of economic and housing growth strategies

The Council's economic and housing growth strategies are not aligned. In Document SD85 the Council states that the two strategic employment sites proposed for allocation in Policy EE1 at Dorset Innovation Park (40 hectares) and Holton Heath Trading Park (5.7 hectares) have a wider, more strategic role and function which supports the economies of the Bournemouth / Poole conurbation and Dorchester / Weymouth so it would be inappropriate to make provision for additional housing to meet past local economic aspirations of the former Purbeck District Council (see para 6.10 of Document SD85). If this explanation for the misalignment of economic and housing strategies is justified then it should be more clearly expressed in the Local Plan.

Unmet housing needs for elsewhere

The Council acknowledge that there is a level of unmet needs arising from neighbouring areas in Bournemouth, Christchurch & Poole Council, New Forest District Council and New Forest National Park although the quantum is yet unknown. The Council considers the appropriate approach is to address this matter through the preparation of the Dorset Local Plan, which the Council has committed to produce and adopt by April 2023, as set out in the Dorset Local Development Scheme approved in June 2019 (see para 6.14 of Document SD85). Again this acknowledgement and proposed approach is not set out in the Local Plan.

Housing requirements for Designated Neighbourhood Areas

The 2019 National Planning Policy Framework (NPPF) strategic policies should 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 (para 65). The NPPG also confirms that if a Neighbourhood Plan as is the case for Wareham and Bere Regis is allocating housing sites then a housing requirement has to be set (ID 41-105-20190509).

The proposed Table in **MM46** of Document SD14 sets out the quantum of proposed housing allocations in respective Neighbourhood Plans rather than the housing requirement for these designated neighbourhood areas. It is suggested that the proposed Table is misleading, incorrect and inconsistent with national policy.

Conclusion on LHN & Housing Requirement

In Document SD14 : Schedule of possible modifications to Purbeck Local Plan pre-submission draft (2018) **MM46 to Policy H1 : Local Housing Requirement** identifies the LHN for Purbeck as 180 dwellings per annum. As identified in Document SD85 this LHN is the capped rather than the uncapped figure of 185 dwellings per annum.

The HBF contend that the housing requirement for Purbeck should be based on the uncapped LHN figure because the Council has identified a deliverable and developable HLS in excess of the uncapped LHN figure. The use of the uncapped figure would also remove the necessity for an early review and make a greater contribution to meeting the significant need for affordable housing.

If a capped LHN figure is used then the Purbeck Local Plan should be subject to an early review presumably this early review will take the form of the new Dorset Local Plan therefore it is suggested that **MM46** is cross referenced to **MM28** as an early review and thereafter 5 yearly review as set out in national policy. Moreover if there is no further adjustments for the alignment of economic and housing strategies and / or meeting unmet housing needs from neighbouring authorities then this also necessitates an early review and the setting out of a more explicit explanation of the Council's approach to these matters in the Purbeck Local Plan.

A housing requirement for Designated Neighbourhood Areas must be set out in accordance with the NPPF.

Housing Land Supply (HLS)

The Council's revised HLS is set out in Document SD86 : Review of Sources of Housing Supply. The replacement Table in **MM47 to Policy H2 : Housing Land Supply** of Document SD14 is based on Table 1 of Document SD86. The HBF consider that this replacement Table provides a clearer and more comprehensive assessment of sources of HLS however there are a number of

outstanding issues on which the Council should provide further clarifying information.

Extant planning permissions

The Council undertook a review of extant planning consents which totalled 512 dwellings as at 1st April 2019. It is not evident if the Council excluded any sites from this category by the application of a lapse rate. If the Council has not taken account of lapses then 100% delivery from extant planning permissions is an unlikely scenario so it is more than likely that this HLS source will be less than 512 dwellings.

Unconsented allocations

The unconsented Purbeck Local Plan allocations (Policies H4 – H7), unconsented Swanage Local Plan allocation, Wareham Neighbourhood Plan and Bere Regis Neighbourhood Plan allocations are all subject to the housing mix requirements of Policy H9. It is unclear if the Council's HLS and housing trajectory take account of non-delivery of self-build plots and specialist homes as Policy H9 provides no remedy if self-builders and / or specialist providers are not forthcoming.

Small sites

The contribution of 138 dwellings under **Policy H8 : Small sites next to existing settlements**. The 2019 NPPF states small and medium sized sites can make an important contribution to meeting housing requirements. The Council should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare in order to promote the development of a good mix of sites (para 68a). Policy H8 as proposed by the Council does not identify small sites and the 138 dwellings is less than 10% of the housing requirement therefore Policy H8 is fundamentally flawed due to its inconsistency with national policy.

The proposed changes set out in **MM53 to Policy H8** introduce maximum scales of development by settlement type which are arbitrary and unjustified by any supporting evidence as Document SD67 does not justify this modification. The introduction of changes under **MM53** are a further impediment to the effectiveness of this policy approach.

Windfall Allowance

37% of the Council's residual HLS is from unallocated sources comprising a windfall allowance of 809 dwellings and 138 dwellings from small sites under Policy H8. This represents a large proportion from unplanned sources. The windfall allowance is only applied for thirteen of fifteen remaining years of plan period (2020/21 – 2032/33) to avoid double counting with extant planning consents for 2019/20 and 2020/21 but it is unclear if there is a potential double count between small sites under Policy H8 and the windfall allowance of 62

dwellings per annum based on historic trends of windfall completions between 2014/15 – 2018/19. The Council should confirm that the SHLAA sites identified in Document SD88 : Review of Capacity of Small Sites as the sources for 138 dwellings under Policy H8 (9 dwellings per annum) are providing additionality to the overall HLS as a result of the Council's proposed new proactive, positive policy approach in Policy 8 rather than a double count of windfall sites which would have come forward anyway under the previous policy regime.

Conclusion on HLS

The HBF does not comment on the merits or otherwise of individual sites and as such our representations are submitted without prejudice to any comments made by other parties on the Council's assumptions on the delivery rates and availability of specific sites.

The headroom between the Council's overall HLS and the housing requirement (subject to further clarifications sought above) provides minimal flexibility. There should be a supply of deliverable and developable land for housing to meet Purbeck's housing requirement, to maintain a 5 Years Housing Land Supply (YHLS) and to achieve performance measurements against the Housing Delivery Test (HDT). The Council's HLS should include a short and long-term supply of housing sites by the identification of strategic and non-strategic allocations for residential development situated in the most sustainable locations. The Council should allocate small housing sites. For the Council to ensure the sufficiency of its HLS the widest possible range of sites by both size and market locations should be chosen to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market.

5 YHLS

The Council's 5 YHLS is set out in Document SD87 : Revised 5 YHLS Report. It is noted that the Council's 5 years housing requirement for 2019/20 – 2023/24 is calculated for a housing requirement of 180 dwellings per annum (see Figure 3.3 of Document SD87). As set out above the HBF consider a housing requirement based on an uncapped LHN of 185 dwellings per annum rather than a capped LHN figure is more appropriate. Using the Council's figures as set out in Figure 5.1 of Document SD87 the re-calculated 5 YHLS is 5.16 years.

Main Modifications to Policies

Policy H3 : New Housing Development Requirements

It is agreed that the reference to the Supplementary Planning Document for the Dorset Heathlands should be removed from Policy H3 as set out in **MM48**.

As Policy H3 relates to only allocated sites it is suggested that these site-specific policy requirements should be subsumed into Policies H4 – H7 respectively. If Policy H3 is retained as a separate policy its policy requirements should not be inferred onto development of small sites under Policy H8 which are unallocated or any other windfall development.

Under Bullet Point (g) the requirement for Electric Vehicle Charging Points (EVCP) is ambiguous because of this lack of clarity the full implications of provision could not have been thoroughly investigated or viability tested. The HBF preference is deletion of Bullet Point (g) however as this is a site specific requirement for allocated sites the HBF defer to the promoters / owners / developers of allocated sites to confirm if the Council's proposed modification is acceptable.

Policy H9 : Housing Mix

The Council's Hearing Statement answer to Matter E, Issue 4, Question 5 has caused some confusion by suggesting that the requirement for 10% single storey homes could be provided as either bungalows or apartments. **MM54** should be further modified to set out the Council's requirements clearly and unambiguously.

The HBF continue to object to the requirement for 5% self-build plots on sites of 20 or more dwellings. If the requirement is retained further changes to **MM54** must include a mechanism for release of self-build plots to the original developer if sales to self-builders do not happen.

Document SD95 – "Care Home provision modification to improve clarity" sets out the Council's revised approach to extra care facilities and specialist purpose built accommodation however the policy remains confusing. It is suggested that the requirements of Policy V1 and Policy H9 in relation to the allocated sites are subsumed into Policies H4 – H7 respectively.

Policy H10 : Part M

The Council should recognise the interaction between requirements for :-

- 10% of new homes to meet M4(2) optional standards on sites of 10 or more dwellings set out in Policy H10 ;
- 10% single storey homes and 20% specialist purpose built accommodation under Policy H9 ; and
- two 65 unit care facilities at Moreton Station / Redbridge Pit (Policy H4) and Wool (Policy H5).

It is suggested that there is overlap of provision sought for which there is insufficient justification in supporting evidence. **MM55** to Policy H10 should be subject to further modification.

Policy H11 : Affordable Housing

SD97 : Key Viability Issues Summary sets out the concerns of key stakeholders regarding viability of the Local Plan and its policies. It is noted that various Memorandums of Understanding (MoU) between the Council and developers / promoters of various allocated sites also set out viability disagreements which should be resolved. Affordable housing provision sought in Policy H11 should not make development unviable.

Strategic Policies

Document SD91 identifies strategic and non-strategic policies and sets out a commentary of conformity with respective Neighbourhood Plans. **MM30** identifies Policies H9, H10 and H11 as strategic policies however **MM54** to Policy H9, **MM55** to Policy H10 and **MM56** to Policy H11 permit Neighbourhood Plans to change these strategic policies whereby the mix of house sizes and types, proportions of requirements for accessible homes and tenure mix of affordable housing may be changed subject to justification with suitable evidence.

The NPPG confirms that strategic policies should be explicitly stated (ID 41-075-20190509) setting out an overarching objective, standard or other requirement that is essential to achieving the wider vision and aspirations of the Local Plan (ID 41-076-20190509). A Neighbourhood Plan policy is in general conformity if it supports and upholds the general principle of the strategic policy concerned and provides an additional level of detail and / or a distinct local approach to the strategic policy without undermining that policy (ID 41-074-20140306). Any requirements placed on development by a Neighbourhood Plan should accord with relevant strategic policies and not undermine the deliverability of either the Neighbourhood or Local Plan (ID 41-005-20190509). Any policies on size or type of housing should be informed by evidence to support relevant strategic policies and supplemented by locally produced information (ID 41-103-20190509).

The changing of strategic policies as proposed in the Council's modifications is inappropriate. The examination of Neighbourhood Plans is not subject to the same level of robust scrutiny of evidence and viability testing as Local Plans. If Neighbourhood Plans are setting different policy requirements for the mix of house sizes and types, proportions of accessible homes and tenure mix of affordable housing this causes uncertainty and undermines deliverability of development. It re-enforces the suggestion that policy requirements specific to the allocated sites should be set out in each individual site allocation policy respectively.

Conclusion

For the Purbeck Local Plan to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35) the Plan should be positively prepared, justified, effective and consistent with national policy. It is considered that the following main modifications are unsound and further changes should be undertaken :-

- MM28 on Reviewing Local Plans ;
- MM30 on Strategic / Non-strategic Policies ;
- MM46 to Policy H1 ;
- MM47 to Policy H2 ;
- MM48 to Policy H3 ;
- MM53 to Policy H8 ;
- MM54 to Policy H9 ;
- MM55 to Policy H10 ; and
- MM56 to Policy H11.

It is hoped that these representations are useful to the Council and Inspector in preparing for the forthcoming (previously postponed) Local Plan Examination Hearing Sessions. If any further assistance or information is required please contact the undersigned.

[Redacted signature block]

Planning Manager – Local Plans



TERENCE
O'ROURKE

Miss H Nolan
Programme Officer
Purbeck Local Plan 2019
Westport House
Worgret Road
Wareham, BH20 4PP

9 September 2019

Our ref: 236801/MM

Dear Miss Nolan

Examination of the Purbeck Local Plan – Comments on the additional documents published by Dorset Council on 2 August 2019

Further to your emails of 12th and 20th August 2019 concerning the above documents, we hereby submit the following comments on behalf of the Rempstone Estate.

SD14 – Updated schedule of main modifications to the Purbeck Local Plan (2 August 2019)

Proposed modifications MM51 and MM53 set out changes to the council's small sites policy (policy H8). Under these proposed changes, the maximum number of new dwellings to be permitted adjacent to a particular settlement depends on whether the settlement is characterised as a town (30 dwellings), a key service village (20 dwellings), a local service village (15 dwellings) or a village with a settlement boundary (5 dwellings).

Paragraph 117 of the NPPF (February 2019) requires planning policies to promote an effective use of land in meeting the need for homes and other uses, whilst paragraph 122 states that planning policies should support development that makes efficient use of land. Paragraph 123 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.

The introduction of a policy that assigns a maximum level of development on all land adjacent to settlements of a particular order irrespective of site size or physical characteristics cannot and does not ensure that land is used efficiently or effectively – and the proposed modifications do not therefore accord with the above paragraphs of the NPPF. Consequently, we do not consider that the

LONDON
7 Heddon Street
London
W1B 4BD

BIRMINGHAM
Enterprise House
115 Edmund Street
Birmingham
B3 2HJ

BOURNEMOUTH
Everdene House
Deansleigh Road
Bournemouth
BH7 7DU

TELEPHONE
020 3664 6755

www.torltd.co.uk



proposed changes are consistent with national planning policy and that they are unsound.

The only way to ensure that policy H8 is consistent with paragraphs 117, 122 and 123 of national planning policy is to allocate specific small sites within the local plan review and to identify the capacity of each site as part of the allocation. This would also enable the plan to be accord with paragraph 68 of the NPPF.

SD88 – Review of potentially suitable small sites

This document was prepared following the first week of examination hearings and takes account of the proposed modifications to the council's small sites policy (policy H8) discussed above.

We act on behalf of the Rempstone Estate who control land to the north of West Lane at Stoborough, which is defined by the local plan review as a local service village. The January 2015 Strategic Housing Land Availability Assessment (SHLAA) included the site, it assigned the site the reference number 6/02/2021, it identified the site area as 1.98 hectares and calculated that at 30 dwellings per hectare, the site had a theoretical capacity of 59.4 units.

The council updated its SHLAA in June 2016. In this document, our client's site was excluded on the grounds that "the Environment Agency confirmed it would object to development here, owing to the low ground levels of the site". Subsequent conversations with the Environment Agency revealed that the district council had misinterpreted their advice, and that the Agency was only opposed to the whole 1.98 hectares of land being developed.

On 13 September 2016, the Rempstone Estate held a pre-application meeting (reference PAP/2016/0175) with officers of Purbeck District Council concerning the potential development of up to 24 units at the site. Council officers indicated that they could support an application for affordable housing under the council's rural exceptions policy (policy RES of the adopted Purbeck Local Plan Part 1) subject to satisfying all material planning considerations. Officers acknowledged that some open market housing would be allowed, and that a 30%/70% market housing/affordable housing split would be an appropriate starting point for negotiations, with any deviations of this needing to be supported by viability evidence.

In January 2018, Purbeck District Council published an updated SHLAA Part 1. In relation to our client's site (SHLAA reference 6/02/0221), the site's potential development capacity was not confirmed, but the council did note the following:

- The site comprised grades 3 and 5 agricultural land
- Initial comments from the AONB team raise no significant objections to the development of the site
- Areas of the site below 3.55m AOD would be undevelopable
- The Lead Local Flood Authority believes that development from a surface water drainage perspective would be "feasible"
- The council acknowledges that an area of the site could be developable from a flood-risk perspective



- Owing to the AONB location, sensitive design would be required
- The site was previously excluded [from the 2016 SHLAA] on the basis of Environment Agency advice in relation to flooding, and that Arne Parish Council therefore removed the site from its draft neighbourhood plan and advised residents that it would not support development at the site
- The site would need to be developed at low density to reflect surrounding properties
- The appropriate area of the site is approximately 0.62 hectares
- The developer has submitted drawings showing the possibility for around 17 units, however, the number will be subject to the outcome of the flood risk assessment and tree survey
- The site is suitable for development, subject to agreeing the developable area of the site.

In June 2018, we held a further pre-application meeting (reference PAP/2018/0033) with planning and housing officers of Purbeck Council to discuss our viability assessment of a 24 unit rural exceptions scheme comprising 50% affordable housing and 50% open market housing. Officers confirmed at the meeting that they would support a planning application for 24 units if the District Valuer was supportive of the viability assessment.

In October 2018, the council updated the SHLAA again, with our client's site now identified as a small site suitable for development, but with a capacity of 18 units (see page 228 of 250). The same conclusion was reached by Purbeck District Council in the January 2019 SHLAA which accompanied the submission of the draft local plan review.

Document SD88 published in August 2019 gives our client's site a new reference (SHLAA/002) and has reduced the site's capacity to 11 units. The second column of the table on page 7 of this document purports to contain a summary of the January 2018 SHLAA, but this is INCORRECT as the summary given is for SHLAA site 6/02/0218 (land at Steppingstone Fields), NOT for SHLAA site 6/02/0221. The conclusion in the final column that "the capacity of the site may be more limited (potentially 11 new homes) but higher than envisaged in the 2018 SHLAA", is also INCORRECT, because it relates to SHLAA site 6/02/0218, NOT our client's site.

Not only is it clear that the council's assessment of our client's site actually relates to a different site, but Dorset Council has not provided any reasons why the capacity of our client's site has been reduced to 11 units or any explanation as to why they have now reached a different view on the site's capacity compared to either previous assessments by policy officers or previous pre-application advice issued by officers. We object to the change that has been made and request that the capacity of the site be re-instated at 18 units.

SD90 – Estimation of affordable homes from small sites and windfall

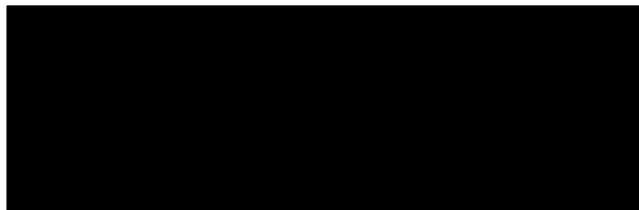
This document identifies our client's site as having a potential capacity of 11 units, with 4.4 affordable housing units being provided at a rate of 40% affordable housing. However, having investigated the viability of this development scenario and compared it to the viability of a 9 unit scheme with



20% affordable housing (2 units) – which could come forward under draft policy H11 - the latter scenario is significantly more attractive to a developer and a landowner.

We therefore consider that the council's estimate of affordable homes from small sites and windfall sites is unrealistic and over-estimates the likely supply because it is not underpinned or informed by any viability analysis.

Kind regards
Yours sincerely



Martin Miller
Director

9 September 2019

WIPL262769/PLP-Response to additional evidence base documents-09.09-2019-
ISSUED



FAO Programme Officer
Purbeck Local Plan 2019
Westport House
Worgret Road
Wareham
BH20 4PP

Andrew Fido
E: afido@savills.com
DL: +44 (0) 1202 856835
F: +44 (0)1202 856801

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

By post and email to:
plp.programmeofficer@dorsetcouncil.gov.uk

Dear Miss Nolan,

Purbeck Local Plan Examination – Comments on behalf of Lulworth Estate, Redwood Properties and Mr Andrew Jackson to Dorset Council (DC) Further Submission Documents

We act for the above who are the landowners of the Wool allocation covered by Policy H5.

Duly made representations (reference number 1190693) were submitted on behalf of our clients at the Regulation 19 stage. Further statements were submitted in response to various Inspectors Matters, Issues and Questions in June 2019 and we participated in various Examination sessions during July and August.

This further representation responds to the Further Submission Documents published by DC immediately before the Examination Hearings between Tuesday 6th and Friday 9th August.

Further Submission Documents to which we have no comments

We have no comments on the following documents:

- SD83 – Assessment of alternative sites for a holiday park
- SD90 – Action 27 – Estimation of affordable homes from small sites and windfall
- SD93 – Mitigation Strategy Green Belt
- SD94 – Explanation of Housing Numbers at Moreton Station
- SD98 – Estimation of affordable housing delivery on small sites and windfall

Further Submission Documents which we wish to comment upon

Our responses are grouped below by document title as follows.



SD14 – Updated list of Main Modifications

This DC document initially compiled a list of possible modifications to PLP policy to address matters raised in representations. As the Examination has progressed it has been further updated throughout June and July in response to the Inspector's Matters, Issues, Questions and Actions. DC has indicated that these possible changes would be 'main modifications' should the Inspector be minded to recommend that the changes are made. Clearly any 'main modifications' would be subject to formal public consultation in the normal way, and we wish to confirm we may make further comments at that stage.

However, in order to progress matters at this stage we can provide limited comment as follows:

- MM31 / Chapter 2, Vision and Objectives – we support the proposed amendments to further justify the PLP Spatial Strategy, specifically the text stating that Wool is a location that is 'less constrained' and has good 'relative accessibility'.
- MM33 / Chapter 2, Vision and Objectives – we support the proposed amendments to further justify the PLP Spatial Strategy by including new references to the settlement hierarchy. It should be noted that Wool is one of the largest 'key service villages' and has a sufficiently large population and range of facilities that it is comparable with some of the towns. Overall it is clear that Wool is at the top end of the hierarchy and therefore appropriate for a significant housing allocation.
- MM1 / policy V1 Spatial Strategy – we have viability concerns regarding the newly proposed text referring to 'care facilities' and 'specialist purpose built accommodation' at Wool as expressed at the hearing sessions in August. These concerns are more clearly set out in our response to document SD95 – Proposed changes to care home provision (see below).
- MM46 / policy H1 Local housing requirements- we support the proposed amendments to set housing requirements for neighbourhood areas, including Wool. However the precise wording regarding housing numbers will need to accord with the final wording adopted for the PLP, for example utilising the term 'up to'.
- MM42 / policy H2 Housing land supply- we note the proposed amendments which break down the source of housing supply at Wool to the sub-component land parcels.
- MM49 / policy H5 Wool – as previously mentioned we have viability concerns regarding the newly proposed text referring to 'care facilities' and 'specialist purpose built accommodation' at Wool. These concerns are more clearly set out in our response to document SD95 – Proposed changes to care home provision (see below). We also believe other changes are necessary as set out in our original Regulation19 representations.
- MM50-MM53 / policy H8 small sites – whilst we criticised this policy in our original representations, we note that DC has to some degree taken these on board and is attempting to rectify the situation.
- MM54 / policy H9 housing mix – this policy is still subject to further Examination in October. Again, we have viability concerns regarding the newly proposed text referring to 'care facilities' and 'specialist purpose built accommodation for the elderly' applicable to the Wool

allocation. These concerns are more clearly set out in our response to document SD95 – Proposed changes to care home provision (see below).

- MM55 / policy H10 part M of the building regulations- this policy is still subject to further Examination in October. Whilst the newly proposed text is helpful, we object to the deletion of the current text which makes explicit reference to allowing a financial viability appraisal at the planning application stage on the grounds that the Housing for older and disabled people NPPG expressly allows the submission of such a document.
- MM59 – MM62 – Strategic policies and neighbourhood plans - we have some concerns that some of the modifications go too far and defer too much latitude to Neighbourhood Plans in setting important aspects of policy. Please see our more detailed comments in respect of document SD91 below.
- MM64/Glossary - we have unresolved viability concerns which are exacerbated by the newly proposed glossary text which seeks to define ‘care facilities’ and ‘specialist purpose built accommodation’ as applicable at Wool through policy H5 and H9. These concerns are more clearly set out in our response to document SD95 – Proposed changes to care home provision (see below).

SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the Identified Need

We note and largely support what is a comprehensive report confirming that the updated figure for local housing need derived from the standard method (180 dpa) can be met from sources of supply already identified in the submitted local plan which includes the Wool allocation.

We disagree with the statement at para 11.5 that key service villages (such as Wool) are not considered appropriate for the allocation of more land either to provide an uplift to 220 or 228 dpa. We contend that Wool is an appropriate sustainable location for additional housing, should it be required, given its status in the settlement hierarchy and sustainability credentials - and the existence of additional deliverable sites within our clients control – as confirmed in DC document SD92 – Addendum to sustainability appraisal, and our other representations.

However, we acknowledge that the issue of (and options for) meeting higher levels of housing provision across Dorset as a whole (including unmet need from neighbouring areas) will be considered through the preparation of the Dorset Local Plan which has already commenced.

Overall we believe it is imperative that the Purbeck Local Plan is adopted as soon as possible with an appropriate housing supply and allocations, including Wool.

SD86: Review of Sources of Housing Supply

We note what is a comprehensive report confirming that this review has identified a revised housing supply based on the latest updates to the plan which exceeds the updated housing requirement based on 180 dpa (2,880 homes) by 242 dwellings.

In addition, we wish to highlight that Wool is an appropriate sustainable location for additional housing, should it be required, for example if an alternate allocation is not considered appropriate.

SD87: Review of 5 year Purbeck Housing Land Supply including detailed trajectory

We note what is a comprehensive report confirming a supply of deliverable sites equivalent to 5.32 years of supply (a deliverable supply of 1285.6 dwellings versus a supply requirement of 1208.4 dwellings, equivalent to 241.7 dwellings per year). This is based on the most up to date plan proposals. Should any policy not be considered sound by the Inspector my clients stand ready to offer additional land at Wool as a substitute.

We note that the 5 year land supply does not rely on any completions from small sites (policy H8) or rural exception sites.

We note and fully support the reliance placed on 215 dwellings being completed at the Wool H5 allocation; and the existing evidence at appendix 3. We wish to correct this document which incorrectly refers to Terrence O'Rourke as the agent when the agent is actually Savills. Much detail is set out in our previous Memorandum of Understanding with DC which can now be updated as follows:

- Preparations for a planning application by the landowners are well advanced for a submission later this year.
- The basis of the planning application is a hybrid form, seeking detailed approval for 30 units on the sub-parcel 'land north of the railway' and the balance as an outline application across the remainder of the Site. Service and infrastructure capacity is readily available for this discrete northern parcel which would allow lead in times to be accelerated for early delivery. As a result of this we anticipate completions from early 2021 in accordance with the currently agreed trajectory.
- In terms of deliverability the advanced preparations for making a planning application have already been evidenced through our Memorandum of Understanding with DC. In summary these include a range of completed surveys and reporting relating to: highways, ecology, flooding/surface water drainage, archaeology, heritage and SANG proposals; and a current pending EIA Screening Opinion request.
- In terms of the contribution from each sub-component land parcel of the Wool allocation to the five year land supply (as referenced at figure 4.1 and appendix 3 of SD87) the full 90 units are expected to be delivered at north east of Burton Cross roundabout, such that the contribution would be as follows:

Settlement	Site location	Total Capacity	Contribution to five-year supply
Wool	West of Chalk Pit Lane / Oakdene Road	320	125 65
	North of railway	30	30
	North east of Burton Cross Roundabout	90	30 -90
	North west of Burton Cross Roundabout	30	30

SD89 – Proposed amendments to the HRA

We are in support of the proposed amendments and additions to the final Purbeck Local Plan HRA and the overall conclusion that it is adequate and fit for purpose.

SD91 – Council response to actions 8, 9 and 10 (non-strategic and strategic policies)

We have some concerns that the proposed modifications would delegate an inappropriate level of policy making to Neighbourhood Plans. Our concerns in particular are as follows:

-small sites policy H8 – new criterion proposed by DC as follows: *'the site does not lie within a Neighbourhood Plan where small sites have been allocated to meet identified housing needs in a made Neighbourhood Plan'*. We are concerned that this change has the potential to constrain the overall housing supply in the former Purbeck District should subsequent Neighbourhood Plans take an overly protective and conservative approach.

-housing mix policy H9 – new text proposed by DC as follows: *'.....where justified with suitable evidence local policies may set distinct local requirements on the mix of different sizes and types of homes'*. We are concerned that this change has the potential to allow a Neighbourhood Plan to set a policy which is significantly at variance with the Purbeck Local Plan. We believe any changes set by Neighbourhood Plans should only be 'small variations' and that variations should only be allowed if justified by reference to the latest SHMA.

-part M of building regulations policy H10 – new text proposed by DC as follows: *'.....where justified with suitable evidence local policies may set distinct local requirements of the proportions and optional design requirements for accessible homes in new housing development'*. We are concerned that this change has the potential to allow a Neighbourhood Plan to set a policy which is significantly at variance with the Purbeck Local Plan. We believe any changes set by Neighbourhood Plans should only be 'small variations' and that variations should only be allowed if justified by reference to the latest SHMA.

-affordable housing policy H11 – new text proposed by DC as follows: *'.....where justified with suitable evidence local policies may set distinct local requirements on the tenure mix for affordable housing provision'*. We are concerned that this change has the potential to allow a Neighbourhood Plan to set a policy which is significantly at variance with the Purbeck Local Plan. We believe any changes set by Neighbourhood Plans should only be 'small variations' and that variations should only be allowed if justified by reference to the latest SHMA or other compelling evidence.

-improving access and transport policy I2 – new text proposed by DC as follows: *'where justified with suitable evidence and consistent with national policy (relating to accessibility of the development, type/mix/use of development, availability, opportunities for public transport, local car ownership levels and the need for spaces with charging points for electric/ultra-low emission vehicles) local policies in neighbourhood development plans may specify distinct local requirements for vehicle parking'*. We believe that this revised wording has sufficient safeguards to prevent a Neighbourhood Plan setting a policy which is significantly at variance with the Purbeck Local Plan.

-recreation, sport and open space I4 – new text proposed by DC as follows: *'where justified with suitable evidence and consistent with national planning policy, local planning policies in*

neighbourhood development plans may seek to identify and protect Local Green Space'. We have no comment.

SD92 – Addendum to sustainability appraisal

We note that this document provides a baseline assessment for Wool which is defined in the Purbeck Local Plan as a key service village at the second level of the settlement hierarchy. The SA Addendum confirms that Wool's existing population is equivalent to the town of Wareham (which is above it in the settlement hierarchy); it has a range of suitable facilities (two primary schools, convenience stores and independent shops); excellent access to the strategic road network and a train station. In terms of capacity for growth it identifies the potential for an additional 672 homes in addition to the allocation for 470 homes and that the sites are relatively unconstrained. In terms of SA objectives Wool is one of the most highest scoring candidate locations as per the summary table at page 33, with para 138 stating *'the assessments of growth at the towns and key service villages show the key service villages as being the most appropriate places for housing development with the most significantly positive effects and the least significantly negative effects'*. These conclusions are supported and emphasises the fact that if required Wool could take a greater housing allocation if other allocations fall away.

SD95 – Proposed changes to care home provision

Our initial concern with the Council requirements for specialist housing for older people is that the Council's definitions do not accord with NPPG Paragraph: 010 Reference ID: 63-010-20190626.

The change in wording to Policy H5 should make it clear what segments of the older person housing market it refers to, for instance 'Extra care housing or housing-with-care' **or** 'Residential care homes and nursing homes'. These housing types given their specialist nature have a very different viability character to market housing, Age-restricted general market housing and retirement living or sheltered housing. Therefore the requirement for a '65 unit care facility' should be specifically tested as part of the Council viability evidence looking at both values and respective build costs. BCIS build costs data clearly shows build costs are higher for Care homes for the elderly and Supported housing compared to general housing. Given the range of different facilities and development types possible and narrow number of operators compared to general housing the Council and its advisors may determine the requirement for an extra care facility should be left to the planning application stage.

DC also seek to introduce *'care facilities and specialist purpose built (elderly) accommodation'* to the PLP glossary as explained in document SD95. This new definition would apply to policy H9, which *'generally expects' 20% of the market and affordable housing mix to provide specialist purpose built elderly accommodation'*. There is currently no definition of this term in the PLP.

Again we are concerned that the definition DC are seeking varies from those set out in the 26 June 2019 NPPG update *'housing for older people'*. In particular the NPPG definition expressly includes *'age-restricted general market housing'*; and also makes references to *'retirement living or sheltered housing'*. Elsewhere in the NPPG are references to the importance of *'accessible and adaptable housing'* which *'enables people to live more independently, while also saving on health and social costs in the future'*, confirming this type of accommodation as an important element of provision given that *'many older people do not want or need specialist accommodation or care and*

may wish to stay or move to general housing that is already suitable, such as bungalows or homes which can be adapted to meet their needs. Plan makers will therefore need to identify the role that general housing may play as part of their assessment’.

The proposed DC definition is: *‘self-contained dwellings or bed spaces suitable for the elderly, disabled or those with dementia by providing either registered personal care available on site 24/7 or a warden is available on site on a regular basis but where no personal care is provided’.* It is close to the NPPG sheltered housing definition but excludes the other NPPG elements of retirement living and age restricted general market housing. It also makes no reference to the important role that can be played by accessible and adaptable housing.

We are concerned that this more constrained definition goes beyond what was tested in the Council’s viability study which assumed values are broadly comparable to general market housing. For example para 3.2.27-3.2.33 of the DSP viability assessment states: *‘DSP’s consistent assessment findings, are that housing-led development (including sheltered / retirement housing for independent living) should not be differentiated for in comparison with the approach to C3 dwellings in general. This forms part of the wide spectrum of market housing provision, within which there is inevitably great variety. These may or may not include an element of accommodation available for or supporting “assisted living” or similar, but in our view should be no less viable than market housing where they are commercial developments offering apartments or similar for market sale as the primary driver. In those cases the apartments would very often command premium level values as new-builds and they form part of the wide-ranging provision within the spectrum of market housing. Our previous work in this regard has been updated in this review and the results of the sheltered housing appraisals are shown in Appendix II. The viability picture on this is however quite different to that relating to accommodation for care provision – typically C2 use where typically the viability may be more marginal. The particular nature of a specialist housing scheme would be reviewed when considering any planning application’.*

The NPPG regarding viability is also relevant as this confirms that the provision of ‘housing for older people’ is one of the circumstances that would justify a viability assessment at the application stage (para 015 Reference ID: 63-015-20190626). The NPPG is also clear that in addressing the housing needs of older people plan making authorities *‘could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period’* (Para 006 Reference ID: 63-006-20190626). It is clear that Government Guidance emphasises flexibility given the potential impacts on viability, and we do not believe adequate flexibility is currently provided for in the policy H9 and H10 wording or related glossary definition, and that negative impacts on viability will result.

In conclusion, the proposed changes to PLP policy for older people further exacerbate our existing viability concerns, which are 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. At present we feel that a number of the viability inputs used by DC in their evidence base are set at levels which combined overestimate the site’s ability to provide affordable housing at 40% whilst meeting other policy requirements, of which the provision of specialist elderly accommodation is an important component.

Whilst the ability to submit a viability assessment at the application stage provides a degree of comfort, we remain concerned that the presently proposed wording is overly prescriptive and would

negatively impact on viability. Our proposed alternative wording would be to increase flexibility in accordance with the NPPG as follows:

- H9 to refer to 20% of the market and affordable housing mix to provide housing for older people. The definition of such to be:
 - *‘Housing for older people includes accessible and adaptable market housing, age restricted general market housing (NPPG definition), and retirement living or sheltered housing (NPPG definition).*
- H5 reference to ‘65 extra care facility’ will need to be amended to make it clear which of the NPPG definitions it relates to. We suspect it will be one of the following –
 - ***‘Extra care housing or housing-with-care:*** *This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.*
 - ***Residential care homes and nursing homes:*** *These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.’*

As stated at the Hearing session without such clarifications the Wool site could be required to provide extra housing/residential care homes under both policy H5 and H9 which is an excessive requirement that will significantly affect viability unless additional land is allocated.

The Inspector will be aware that the Wool landowners are meeting with Dorset Council to discuss the wider issue of viability with a view to agreeing common ground. It is therefore anticipated that a further update will be possible in advance of the Examination and hopefully the above concerns can be addressed.

SD96 – Proposed amendments and additions to the final Purbeck Local Plan HRA

We are in support of the proposed amendments and additions to the final Purbeck Local Plan HRA and the overall conclusion that is adequate and fit for purpose.

SD97 – Summary of key stakeholders’ issues raised regarding viability of the Local Plan and its policies

We note that this document is a simple summary and in effect provides no new viability evidence, other than confirming that viability concerns have been raised by the parties promoting the three

main allocations, together with the House Builders Federation and the Retirement Housing Consortium.

Our position remains 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. At present 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% whilst meeting other policy requirements, of which the requirement for housing for older people (policy H5 and H9) is an important component (among others). We consider a level at 30% to be more reflective of the overall scheme viability for the Wool allocation, unless other policy requirements are reduced.

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. 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. We also have concerns with regards to housing mix and housing for older people and the impacts of SD95 – Proposed changes to care home provision.as set out above.

The Inspector will be aware that the Wool landowners are meeting with Dorset Council to discuss the issue of viability with a view to agreeing common ground. It is therefore anticipated that a further update will be possible in advance of the Examination and it is possible that the above concerns can be addressed.

Conclusion

These representations are submitted to the Programme Officer for the Inspector's attention. They are also copied to Dorset Council. In the few weeks remaining before the Examination reconvenes efforts will be made to engage with DC to try overcome as many of the issues raised as possible.

Yours sincerely



Andrew Fido
Director

Examination of the Purbeck Local Plan

Statement on Dorset Council's Post-hearing Documents

Submitted by Wareham Neighbourhood Plan Steering Group (ID 1188328)

Reference SD14 Updated list of modifications

Policy V2 Green Belt – a further modification will be required if the proposed amendment of the Green Belt at Wareham is no longer pursued. There are now no exceptional circumstances to justify the amendment of the Green Belt boundary at Wareham since the housing requirement in the Local Plan can now be met within the existing settlement boundary.

MM4 Agree with proposed amendment recognising the role of neighbourhood plans in providing additional detail around locally distinctive characteristics.

MM47 H2 – in view of the above, no doubt it is now proposed to remove the reference to 60 homes west of Westminster Road, Wareham.

MM53 – H8 (small sites policy) – PPG para 001 on neighbourhood planning states that “Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built ...” When made neighbourhood plans are part of the Development Plan and have to be thoroughly prepared to meet the Basic Condition and pass independent Examination. In developing Neighbourhood Plans all possible development sites are considered and evaluated against criteria including policies in NPPF leading to the choice of development sites by the community. Allowing policy H8 to apply within such areas would undermine the hard work put in by local communities in preparing a plan and undermine the plan itself. It would seriously damage the credibility of the planning system. It is suggested that this policy does not apply where neighbourhood plans are up to date and allocate sites for development.

MM54 H9 We support the proposed amendment which recognises the role of neighbourhood plans in including local policies on the mix of different sizes and types of housing

MM62 I para 252 We support the proposed amendment which recognises the role of neighbourhood plans in protecting local green spaces.

Reference SD85 Housing Need

Para 8.7 refers to land west of Wareham. This site lies entirely within the Dorset AONB where great weight should be given to conserving the landscape and scenic beauty (NPPF para 172), and where major development should not be permitted. This area of AONB is on a low ridge west of Wareham on the north side of the Frome valley where development would be highly prominent in the landscape and very visible from the Purbeck Hills to the south. In addition, this site is on the far side of the Wareham bypass which separates the site from the town and all local facilities. Development here would lead to the formation of a separate community harmful to the social cohesion of Wareham.

Para 9 refers to sites to the west and east of Bere Road. Both of these sites lie within the Green Belt and therefore amendment of the Green Belt would need to be justified in terms of exceptional circumstances. The requirement to provide 300 homes as set out by Local Planning Authority can now be met without an amendment to the Green Belt boundary and we therefore consider that there are no exceptional circumstances to justify a boundary change. In accord with NPPF para 137 the Wareham Neighbourhood Plan makes as much use as possible of brownfield sites and underutilised land. Allowing land to be released from the Green Belt around Wareham would undermine regeneration of vacant and underused sites at Westminster Road and Johns Road contrary to the 5th purpose of the Green belt as set out in NPPF para 134.

With regard to the land to the east of Bere Road there are also additional reasons for considering this unsuitable for development including:

- the major impact it would have on nature conservation in view of the site's immediate accessibility to Wareham Forest
- it would not be possible to provide an effective SANG that would effectively mitigate development in view of the closeness to Wareham Forest
- the impact on an area of high-quality landscape
- the loss of well used, secure and long-established allotments

The independent Site Assessment and Strategic Environmental Assessment carried out by AECOM for the Wareham Neighbourhood Plan concluded that the sites west of Wareham and east of Bere Road were not appropriate to bring forward for development.

We request that these paragraphs be amended to reflect the unsuitability of these sites for development.

SD86 Review of Sources of Land Supply

Section 9 includes the revisions to the housing supply from the Wareham Neighbourhood Plan. We confirm that this is correct.

SD91 Council response to actions 8,9 and 10

H8 (small sites policy) That neighbourhood plans that are allocating sites for development be excluded from this policy.

I4 – There is still an area of potential confusion between a neighbourhood plan and local plan with regard to which open spaces are afforded special protection which needs to be resolved. We suggest that either the Local Plan leave the open spaces to be defined in the Neighbourhood Plan or that those highlighted in the Local Plan reflect the open spaces identified in the Wareham Neighbourhood Plan.

SD93 Mitigation Strategy Green Belt

These needs to be updated in the light of proposed amendments to the Wareham Neighbourhood Plan to state along the lines that the publishing of options for the development of the former Wareham Middle School site have shown that the site has capacity for 90 dwellings such that there is no longer justification for the amendment of the Green Belt adjoining Wareham. In the light of this amendment being proposed to the Wareham Neighbourhood Plan (now with the Examiner), a HIP rather than a SANG is needed to mitigate development north of the railway line. A Statement of Common Ground covering mitigation measures for the whole NP to meet the requirements of the HRA has been agreed with Dorset Council, Wareham Town Council, Natural England and Henry Scott owner of the Bog Lane SANG.

SD95 Proposed changes to care home provision

The table in this document refers to the provision of 64 extra care units at Wareham Health Hub. It should be noted that in addition to extra care housing, affordable housing and key worker housing is also proposed on this site.

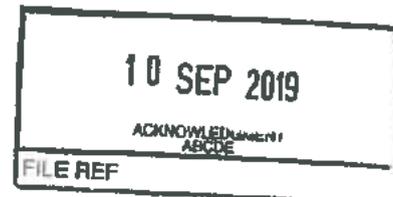
For further information on the Neighbourhood Plan changes and supporting evidence please see <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/neighbourhood-planning-purbeck/wareham-neighbourhood-plan.aspx>

Examination of the Purbeck Local Plan Reviews of Purbeck documents

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SD85: Housing Need in Purbeck: Assessing and Seeking to Meet the identified Need**SD85****Introduction****Additional Housing Need**

1. SD85 states on page 3 in paragraph 2.1 that:

The submitted Purbeck Local Plan indicates that the minimum annual housing need figure for Purbeck is 168 dwellings per annum (dpa). However, following discussions at the hearings, the Inspector expressed the view that using the most up-to-date information at the time of submission would result in a minimum annual local housing need figure of 180 dpa.

2. In paragraph 2.2 Dorset Council state:

Dorset Council accepts that the standard method establishes a minimum annual housing need figure for Purbeck of 180 dpa and that, as a minimum, the council should aim to make provision for this level of need in the Purbeck Local Plan. In the event that the local housing need figure was increased to 180 dpa, the Purbeck Local Plan would need to make provision for an additional 192 homes over the plan period,

3. Paragraph 3.2 states:

This means that a housing provision figure based on the updated standard method figures (180 dpa) would not have any implications for the spatial strategy in the local plan because the figure could be met from the (revised) sources of housing supply already identified.

4. SD95 then assess the impact of higher levels of housing need and the additional homes required, partly in response to the views expressed by participants at the Local Plan Examination.
5. SD95 reviews increasing the housing allocations to the 3 towns but considers the constraints mean that the bulk of the housing increase should be in the 'Lower Order Settlements'. These are shown on page 15 in Table 8.

6. SD95 on page 17 shows the Residual capacity of Options Sites.

8.29 Table 8 below sets out the residual capacity of the options sites considered in the 2016 options consultation document, having regard to the allocations in the submitted local plan and any other changes in circumstances.

Settlement	Capacity for Homes
Key Service Village	
Lytchett Matravers: North East	10
Lytchett Matravers: sites elsewhere	400
Wool	530
Local Service Village	
Langton Matravers	12
Other Village with a Settlement Boundary	
Harman's Cross	20
Lytchett Minster	650
Moreton Station: Redbridge Pit	0
Moreton Station: North of Moreton Station	100

Table 8: Residual Capacity of Option Sites Identified in the 2016 Options Consultation Document

7. These numbers represent the difference between the allocations in the Local Plan Submission and the sites and allocations in the June 2016 Options Consultation.
8. For example Wool had an allocation of 1000 houses in 2016 and 470 houses in the 2019 Local Plan Submission. Thus the table represents Wool as having a spare capacity of $1000 - 470 = 530$ houses
9. SD95 states on page 17 in paragraph 8.34 that:

8.34 In total the submitted Purbeck Local Plan and the preferred options for the West Dorset, Weymouth & Portland Local Plan Review propose 1,604 homes in the Moreton Station / Crossways area. Delivery would have to average more than 100 dpa over the remaining 15 years of the plan period in order for all 1,604 homes to be built by 2034. The allocation of a further 100 homes at Moreton Station may not actually deliver any more homes in the area by 2034, especially when lead-in times for development are taken into account.

10. The 1604 figure wrong. The number now is 1684 as I have shown in my Evolution table in my comments on SD94. I have copied below the section of my Evolution figure showing the derivation of this number.

Other allocations and average % increase in Purbeck District excluding Moreton Station (Submission Local Plan)

	Houses	Allocation	% Increase
Bere Regis	841	105	12%
Wool	2159	535	22%
Wareham	2728	300	11%
Lytchet Matravers	1494	150	10%
Upton	3424	90	3%
Total	10646	1180	11.1%
Moret St/RB Pit	83	555	669%
Crossways			
Moret St/RB Pit	1100	555	50%
Purb sm site- Maple Lodge		15	
Summer Farm(500)+	1100	500	45%
W of Oaklands (49)+	1100	49	4%
Frome Valley Rd	1100	140	13%
Total	1100	1259	114%
West Dorset Preferred Options			
Woodsford Field	1100	275	25%
West of Crossways	1100	150	14%
Overall Total	1100	1684	153%
Housing total excluding Redbridge Pit			
		1129	103%

11. I have raised at the examination that so many houses have been allocated to Crossways that they may take longer than the plan period to build.

12. On page 19 in paragraph 11.1, SD95 states that:

11.1 Dorset Council has undertaken a review of sources of housing land supply and this shows that the updated figure for local housing need derived from the standard method (180 dpa) can be met from sources of supply already identified in the submitted local plan.

13. SD95 states on page 20 in paragraph 11.3 that:

11.3 As a result of the highly constrained nature of the land around the three main towns in Purbeck (Upton, Swanage and Wareham) only about 20.2% of housing growth (excluding completions in 2018/19 and windfall) is proposed at them. A much higher proportion is proposed at 'lower order settlements', which are less constrained.

The failure of SD85 to be realistic – the AONB

14. I have copied my 79% figure from my response to SD94 Section H below which has under column A a box showing that whilst Swanage+Upton+Wareham contain 59% of Purbeck houses (13075 houses), they only receive 22.5% of the Local Plan housing growth.

15. Also shown on the 79% figure under column P in a box is the fact that Moreton Station has only 83 houses or 1% of Purbeck's housing but receives 32% of the Local Plan housing growth.
16. SD85 in effect accepts this gross disparity because of the extreme sensitivity shown to the fact that Swanage is in the AONB and the main extension to Wareham (west of Wareham) is also in the AONB.
17. The NPPF Chapter 15 (page 49) is titled *Conserving and enhancing the natural environment covers Areas of Outstanding Natural Beauty*.
18. The chapter does not prohibit development within the AONB. It states in paragraph 172 on page 49 that
- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty,*
19. Swanage is the largest settlement in Purbeck with approximately 5759 houses. It has approximately 1872 more houses than the next largest settlement within: Wareham. Upton is in Purbeck but is attached directly to Poole.
20. There are no statements in the Local Plan or any supporting document or the Swanage Local Plan that Swanage in any way has harmed the AONB.
21. Chapter 15 of the NPPF does not prohibit development in the AONB. Paragraph 172 on page 50 states that:
- The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way;*
- 55 For the purposes of paragraphs 172 and 173, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.*
22. The reference 55 does allow a decision maker to approve a major development after consideration of the factors in reference 55.

23. The grossly disproportionate housing allocation between Moreton Station which has 1% of Purbeck's houses but 32% of its housing allocation and Swanage which has 26% (5759 houses /21985 Purbeck total houses=26%) of its housing but no housing allocation in the Local Plan qualifies as an *exceptional circumstances*.
24. The Redbridge Pit housing allocation of 490 houses means that Purbeck's largest affordable housing development will be over 10 miles from the Worgret bridge near Wareham, to the east of which approximately 79% of Purbeck residents live. This means that because no houses have been allocated in Swanage, people wanting an affordable house will probably have to travel 20 miles west to obtain an affordable house on Redbridge Pit.
25. For those elderly residents of the east of the district including Swanage who need or want to obtain a care facility they may have to make a very disconcerting relocation to Redbridge Pit which has one 65 place care facility.
26. The gross separation of housing including affordable housing and care facilities from over 79% of the population of Purbeck definitely qualifies as an exceptional circumstance in the context of paragraph 172 on page 50 of the NPPF.
27. The Local Plan Submission is, therefore, wrong to prohibit all development in the AONB.
28. As my 79% figure below shows at least 44% of Purbeck's houses are in the AONB and the NPPF paragraph 172 does permit Local Plan housing to be allocated to serve those people who live in the AONB.

The failure of SD85 to be realistic – the Green Belt

29. The NPPF states on page 42 in paragraph 144 that:

144. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

30. The proposal to develop housing at Lytchett Minster in the Options Consultation, June 2016, is an almost classic case where development in one part of the Green Belt actually helps to implement four of the *five purposes* of the Green Belt stated on page 40 in paragraph 134:
- a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns;*

31. The development would check unrestricted sprawl by strictly controlling the amount of development and maintaining the gap between the development and village of Lytchett Minster and Upton. The gap is in Flood zones 2& 3.
32. Lytchett Minster is part of Upton parish and it is in Upton's interest not allow development in the fields between Lytchett Minster and Upton.
33. The two neighbouring towns are Upton and Wareham. The proposed development projects Lytchett Minster in a northerly direction and not west which is the direction of Wareham.
34. The proposed Green Belt development's main benefit is that it would *assist in safeguarding the countryside from encroachment* (purpose C above).
35. Development at Lytchett Minster would mean that some of the 650 houses (the Options Consultation, June 2016 allocation) would not have to be developed elsewhere in the Purbeck Green Belt, for example Lytchett Matravers or further in to Purbeck District. In so doing it would safeguard Purbeck from the pressure of development on Wareham, Swanage and Purbeck's villages such as Wool and Redbridge Pit about 25 miles away.
36. This not conjecture. The Options Consultation June 2016 had a statement in the Site 4 Moreton Station description on page 31 that:

Should other sites in the preferred option prove undeliverable at a later stage, it would put additional pressure to build more at this site.
37. The Moreton Station page starts with the statement that:

The Council's preferred option is for around 350 homes in this location.
38. The allocation at Site 2 Lytchett Minister on page 27 was *around 650 homes*.
39. With the withdrawal of Lytchett Minster by Purbeck Council in the Local Plan Submission, the Moreton Station allocation has risen to 555 plus a small site at Maple Lodge of 15 houses giving a total of 570 houses.
40. This will have the effect of significant increased traffic on the already crowded A351 road through Sandford and extend the already extensive queues at the Wool railway crossing. It will add to the pollution of the air in Purbeck from vehicle emissions, including in the AONB which close to and adjacent to the A352 between Wareham and Wool. It will also markedly increase the traffic on the minor single track roads between Wool and Redbridge Pit.

41. The development of Lytchett Minster would help implement paragraph 134 sub-paragraph d) :

to preserve the setting and special character of historic towns.

42. It is unlikely that the 650 households would travel into Wareham and Swanage when they are far more likely to travel to Poole and Bournemouth. This would significantly reduce the pressure on Wareham and to a much lesser extent on Swanage would be almost 20 miles away.

Summary

43. SD85 has perpetuated the erroneous position of the Purbeck Local Plan Submission of allocating 32% of Purbeck's housing allocation to a community which contains only 1% of the District's population whilst allocating no houses to Swanage which contains 26% of the District's housing.

44. SD85 has failed to recognise that the NPPF will allow housing in the Green Belt and AONB under special circumstances.

45. The proposal to allocate 32% of the Local Plan's housing to a community containing only 1% of the district's housing, at least 10 miles away from where 79% of Purbeck's housing is located fulfils the NPPF's requirement for an exception or exceptions to be made to the AONB to ensure that housing and in particular affordable housing is provided where the majority of Purbeck's population lives and works.

46. I have also shown that the development at Lytchett Minster in the Green Belt would greatly benefit the Green Belt by implementing 4 of the 5 reasons given in the NPPF for having a Green Belt.

Conclusion

47. The Purbeck Local Plan Submission should drop its prohibition on development in the AONB and allow some development. The NPPF does allow some development on the basis of special circumstances and the fact that almost half the district and Purbeck's largest settlement are located in the AONB.

48. Similarly the NPPF will allow some development in the Green Belt and I have shown that the development of Lytchett Minster will actually enhance the Green Belt.

79% of existing Purbeck housing is east of the Worwret Bridge, but 32% of Local Plan housing allocation is on Redbridge Pit 10 miles west

M N Hill - 20 September 2019

Questionnaire Returns	Telephone calls	As % of total no. houses in location	TCL	EC2
1	1301	23%	231	4%
2	851	25%	147	4%
3	934	34%	123	5%
4	778	36%	135	6%
5	637	43%	69	5%
6	401	35%	50	4%
7	109	24%	46	7%
8	211	30%	31	4%
9	234	37%	32	5%
10	147	31%	12	3%
11	82	21%	9	2%
12	121	33%	28	7%
13	110	34%	8	2%
14	65	25%	5	2%
15	87	40%	3	1%
16	43	24%	2	3%
17	48	32%	17	3%
18	38	43%	10	3%
19	18	21%	6	7%
20	24	29%	6	7%
21	21	27%	1	1%
22	18	23%	1	1%
23	8	20%	1	2%
24	61	30%	4	3%
25	284	26%	0	0%
6722				1001

Neighbourhood Plan = NP	Existing Housing	Existing Houses	ACNH/Green Belt/No Constraints	Housing allocations
Swanage	1	5759	1	5759
Upton/Worwret/Warham	2	3429	2	3429
Wareham/Worwret	3	2728	3	2728
Wool	4	2189	4	2189
Wareham/Worwret	5	1454	5	1454
Wareham/Worwret	6	1159	6	1159
Wareham/Worwret	7	843	7	843
Wareham/Worwret	8	710	8	710
Wareham/Worwret	9	630	9	630
Wareham/Worwret	10	479	10	479
Wareham/Worwret	11	343	11	343
Wareham/Worwret	12	270	12	270
Wareham/Worwret	13	175	13	175
Wareham/Worwret	14	158	14	158
Wareham/Worwret	15	220	15	220
Wareham/Worwret	16	177	16	177
Wareham/Worwret	17	150	17	150
Wareham/Worwret	18	88	18	88
Wareham/Worwret	19	83	19	83
Wareham/Worwret	20	84	20	84
Wareham/Worwret	21	83	21	83
Wareham/Worwret	22	83	22	83
Wareham/Worwret	23	80	23	80
Wareham/Worwret	24	76	24	76
Wareham/Worwret	25	54	25	54
Wareham/Worwret	26	41	26	41
Wareham/Worwret	27	38	27	38
Wareham/Worwret	28	0	28	0
Wareham/Worwret	29	0	29	0
Wareham/Worwret	30	0	30	0
Wareham/Worwret	31	0	31	0
Wareham/Worwret	32	0	32	0
Wareham/Worwret	33	0	33	0
Wareham/Worwret	34	0	34	0
Wareham/Worwret	35	0	35	0
Wareham/Worwret	36	0	36	0
Wareham/Worwret	37	0	37	0
Wareham/Worwret	38	0	38	0
Wareham/Worwret	39	0	39	0
Wareham/Worwret	40	0	40	0
Wareham/Worwret	41	0	41	0
Wareham/Worwret	42	0	42	0
Wareham/Worwret	43	0	43	0
Wareham/Worwret	44	0	44	0
Wareham/Worwret	45	0	45	0
Wareham/Worwret	46	0	46	0
Wareham/Worwret	47	0	47	0
Wareham/Worwret	48	0	48	0
Wareham/Worwret	49	0	49	0
Wareham/Worwret	50	0	50	0
Wareham/Worwret	51	0	51	0
Wareham/Worwret	52	0	52	0
Wareham/Worwret	53	0	53	0
Wareham/Worwret	54	0	54	0
Wareham/Worwret	55	0	55	0
Wareham/Worwret	56	0	56	0
Wareham/Worwret	57	0	57	0
Wareham/Worwret	58	0	58	0
Wareham/Worwret	59	0	59	0
Wareham/Worwret	60	0	60	0
Wareham/Worwret	61	0	61	0
Wareham/Worwret	62	0	62	0
Wareham/Worwret	63	0	63	0
Wareham/Worwret	64	0	64	0
Wareham/Worwret	65	0	65	0
Wareham/Worwret	66	0	66	0
Wareham/Worwret	67	0	67	0
Wareham/Worwret	68	0	68	0
Wareham/Worwret	69	0	69	0
Wareham/Worwret	70	0	70	0
Wareham/Worwret	71	0	71	0
Wareham/Worwret	72	0	72	0
Wareham/Worwret	73	0	73	0
Wareham/Worwret	74	0	74	0
Wareham/Worwret	75	0	75	0
Wareham/Worwret	76	0	76	0
Wareham/Worwret	77	0	77	0
Wareham/Worwret	78	0	78	0
Wareham/Worwret	79	0	79	0
Wareham/Worwret	80	0	80	0
Wareham/Worwret	81	0	81	0
Wareham/Worwret	82	0	82	0
Wareham/Worwret	83	0	83	0
Wareham/Worwret	84	0	84	0
Wareham/Worwret	85	0	85	0
Wareham/Worwret	86	0	86	0
Wareham/Worwret	87	0	87	0
Wareham/Worwret	88	0	88	0
Wareham/Worwret	89	0	89	0
Wareham/Worwret	90	0	90	0
Wareham/Worwret	91	0	91	0
Wareham/Worwret	92	0	92	0
Wareham/Worwret	93	0	93	0
Wareham/Worwret	94	0	94	0
Wareham/Worwret	95	0	95	0
Wareham/Worwret	96	0	96	0
Wareham/Worwret	97	0	97	0
Wareham/Worwret	98	0	98	0
Wareham/Worwret	99	0	99	0
Wareham/Worwret	100	0	100	0

Column Identifiers	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Swanage	1	5759	69	5759	1	5759	1	5759	1	5759	1	5759	1	5759	1	5759
Upton/Worwret/Warham	2	3429	41	3429	2	3429	2	3429	2	3429	2	3429	2	3429	2	3429
Wareham/Worwret	3	2728	33	2728	3	2728	3	2728	3	2728	3	2728	3	2728	3	2728
Wool	4	2189	28	2189	4	2189	4	2189	4	2189	4	2189	4	2189	4	2189
Wareham/Worwret	5	1454	18	1454	5	1454	5	1454	5	1454	5	1454	5	1454	5	1454
Wareham/Worwret	6	1159	14	1159	6	1159	6	1159	6	1159	6	1159	6	1159	6	1159
Wareham/Worwret	7	843	10	843	7	843	7	843	7	843	7	843	7	843	7	843
Wareham/Worwret	8	710	9	710	8	710	8	710	8	710	8	710	8	710	8	710
Wareham/Worwret	9	630	8	630	9	630	9	630	9	630	9	630	9	630	9	630
Wareham/Worwret	10	479	5	479	10	479	10	479	10	479	10	479	10	479	10	479
Wareham/Worwret	11	343	5	343	11	343	11	343	11	343	11	343	11	343	11	343
Wareham/Worwret	12	270	4	270	12	270	12	270	12	270	12	270	12	270	12	270
Wareham/Worwret	13	175	4	175	13	175	13	175	13	175	13	175	13	175	13	175
Wareham/Worwret	14	158	3	158	14	158	14	158	14	158	14	158	14	158	14	158
Wareham/Worwret	15	220	3	220	15	220	15	220	15	220	15	220	15	220	15	220
Wareham/Worwret	16	177	2	177	16	177	16	177	16	177	16	177	16	177	16	177
Wareham/Worwret	17	150	2	150	17	150	17	150	17	150	17	150	17	150	17	150
Wareham/Worwret	18	88	1	88	18	88	18	88	18	88	18	88	18	88	18	88
Wareham/Worwret	19	83	1	83	19	83	19	83	19	83	19	83	19	83	19	83
Wareham/Worwret	20	84	1	84	20	84	20	84	20	84	20	84	20	84	20	84
Wareham/Worwret	21	83	1	83	21	83	21	83	21	83	21	83	21	83	21	83
Wareham/Worwret	22	83	1	83	22	83	22	83	22	83	22	83	22	83	22	83
Wareham/Worwret	23	80	1	80	23	80	23	80	23	80	23	80	23	80	23	80
Wareham/Worwret	24	76	1	76	24	76	24	76	24	76	24	76	24	76	24	76
Wareham/Worwret	25	54	1	54	25	54	25	54	25	54	25	54	25	54	25	54
Wareham/Worwret	26	41	0	41	26	41	26	41	26	41	26	41	26	41	26	41
Wareham/Worwret	27	38	0	38	27	38	27	38	27	38	27	38	27	38	27	38
Wareham/Worwret	28	0	0	0	28	0	28	0	28	0	28	0	28	0	28	0
Wareham/Worwret	29	0	0	0	29	0	29	0	29	0	29	0	29	0	29	0
Wareham/Worwret	30	0	0	0	30	0	30	0	30	0	30	0	30	0	30	0
Wareham/Worwret	31	0	0	0	31	0	31	0	31	0	31	0	31	0	31	0
Wareham/Worwret	32	0	0	0	32	0	32	0	32	0	32	0	32	0	32	0
Wareham/Worwret	33	0	0	0	33	0	33	0	33	0	33	0	33	0	33	0
Wareham/Worwret	34	0	0	0	34	0	34	0	34	0	34	0	34	0	34	0
Wareham/Worwret	35	0	0	0	35	0	35	0	35	0	35	0	35	0	35	0
Wareham/Worwret	36	0	0	0	36	0	36	0	36	0	36	0	36	0	36	0
Wareham/Worwret	37	0	0	0	37	0	37	0	37	0	37	0	37	0	37	0
Wareham/Worwret	38	0	0	0	38	0	38	0	38	0	38	0	38	0	38	0
Wareham/Worwret	39	0	0	0	39	0	39	0	39	0	39	0	39	0	39	0
Wareham/Worwret	40	0	0													

SD86: Review of sources of housing supply

SD86**1. Overall comment**

1. Paragraph 2 on page 2 and Table 1 are an improvement on the past vague approach to housing supply.
2. But surely what is presented in this paper should have started at least in 2014 prior to the Issues and Options Consultation, January 2015, and been continuously updated subsequently as events changed.
3. The plethora of documents which have been produced appear to indicate that Purbeck planning staff are learning on the job how to produce a Local Plan.
4. There does not appear to be a structure to the documents, though at least they are now being numbered.
5. Each document appears to be produced in isolation from other documents even though there could well be a relationship between documents.
6. Documents are also written as though the reader is fully conversant with all aspects of the subject matter. Reviewing SD83 required a knowledge at the outset of the location of SANGs which became clearer as I progressed through the document. But at the outset I had no idea where for example Bog Lane SANG or Frenches SANGs are located.
7. It is notable that none of the documents has a date and issue number, some such as the SD14 Main Modifications and SD88 Review of Capacity of Small Sites do not even have contents lists which means the reader has to plough through the document and create a contents list in the process. Only a few of the documents have references and then only in title form without any page and paragraph numbers. HTML links are a rarity (time precludes me adding HTML links to my responses to these documents). The documents would also benefit from having the name of the author attached which would make it much easier to check detail.

Table 1 (page 3.)

8. Wareham Neighbourhood Plan. Having split the windfall out of the Wareham Neighbourhood Plan highlights what a small allocation of house is being planned for the 3rd largest town in Purbeck.

9. Unconsented Swanage Local Plan allocations. What is this? The Swanage Local Plan on page 42 in Policy SS: Swanage Settlement states that the allocation will be *approximately 200 houses*.
10. Policy H2 in the Local Plan Submission, January 2019, states the allocation will be *150 houses*
11. Now the allocation appears to be 40 houses. There is no reference to a paper which explains this variation.

Extant Consents at 01 April 2019 (page 4)

12. Paragraph 5.2 refers to paragraph 104 on page 32 of Inspector's Matters, Issues and Options – Matter E. I would guess that this refers to Purbeck planners response to the Inspector on Matter E
13. Paragraph 5.3 appears to provide an answer but appears to refer to a 'consents' category in SD87 but does not give the page number.
14. It appears the person who has produced SD86 has also produced SD87 but has not stopped to see whether what they have written is intelligible to someone who has not written SD86 and SD87.

Revisions to the Housing Supply from Allocations in the Purbeck Local Plan (page 5)

15. Paragraph 6.1 refers t:

...consideration in now being given to the additional allocation of 60 homes on the side west of Westminster.

16. When will a decision be made? This appears to highlights the why it is wrong to produce a district Local Plan which uses a Neighbourhood Plan which is not complete.

Conclusions

17. These are straightforward.
18. The impression is given that until SD86 was written Purbeck planners were not sure whether or not they would have to increase the allocations to satisfy an annual requirement of 180 dwellings per annum.

19. Had the Planners started this approach to housing supply at the outset it would appear that they would have been in a better position to respond to the suggestion of 180dpa at the Examination hearings.

SD87: Revised Five Year Housing Land Supply Report

SD87**Contents list but no page numbers**

1. SD87 has a contents list with associate page numbers, the pages themselves do not have page numbers.

1. Figures 3.1 and 3.2 (no page number)

2. Without an indication of the sites which are referred to in these tables it is not possible to validate the tables.

Figure 4.1 (no page number)

3. The figure only has Moreton Station and Redbridge Pit. Wool and Lytchett Matravers have entries for all the sites in those villages.
4. Because Purbeck planners rigorously will not acknowledge that Redbridge Pit is really in Crossways and is not in Moreton Station and has nothing to do with Moreton Station, they have not included the allocated sites in Crossways.
5. Figure 4.1 should include Summer Farm – 500 dwellings, Land adjacent to Oaklands Park 49, Frome Valley Road 140, together with Maple Lodge 15 since each of these will in theory be built at the same time and impact upon the contribution which Redbridge Pit makes to the five year supply. Whilst their 5 year supply should be stated but not included in the total they will directly affect progress on Redbridge Pit.

Figure 4.4 Total Deliverable Suppley

6. The major and minor sites need to be identified.
7. Redbridge Pit is the largest allocation and has been identified on Table 4.1.
8. The table of major sites in Appendix 2 should also be included in the text before Figure 4.4 so that the reader knows what sites comprise the major sites in Figure 4.4.

SD88: Review of capacity of small sites. SD83 Alternative sites for a holiday park
SD93: Strategy for mitigating the effects of new housing on European sites and justification for
changes to green belt boundaries at Morden

SD88 and SD93

SD 88 - Review of capacity of small sites

Contents List

1. SD88 provides a list of:

the numbers of homes that are likely to be delivered on small sites and their distribution across Purbeck.(page 3 paragraph 8)

2. SD88 does not include a contents list of the sites and so I have produced a contents list which is shown on the following page. I have reproduced the potential number of houses which individual sites may provide as well as the estimated capacity of each site. I have summarised the constraints for each site.

The nearest SANGs to the small sites

3. The list on the following page shows that 89% of the small sites houses are south of the A352 Dorchester to Wareham road. Whilst the Stoborough sites are about 5 miles from the proposed strategic SANG at Morden Park the remainder are about 10 to 15 miles from the Strategic SANG.
4. Moreton is the only small site location which is north of the A352 and it has access to the proposed Redbridge Pit SANG.
5. Thus the proposed SANG at Morden does not fulfil a site specific or strategic role for the small sites.
6. The SANGs at Wool, Bog Lane and Moreton, and the forthcoming SANG at Swanage are much closer to all the small sites.

SD88 Review of potentially suitable small sites								
page	Site name	Address	SHLAA	Potential	Comment	Est Capacity	South of A352 A352 Road	Number of settlements
5	Stoborough	Steppingstones Fields	0001	11	AONB+noise	15	11	
7	Stoborough	West Lane (opp above site)	002	11	AONB+noise	18	11	1
8	Bere Regis	North Street	0004	\	In NP= 12	24		
9	Bere Regis	Rye Hil	009	\	In NP = 22	23		
10	Bere Regis	South of A35	0010	\	In NP = 55	25		
11	E Chaldon	Opp depot	0013	4		5	4	1
12	Swanage	Cauldron Barn	0054	\	AONB	13		1
13	Swanage	Prospect Farm	0055	29	AONB	29	29	
14	Swanage	Townsend Road	0056	\	SAC&SSS1	14		
15	West Lulworth	Sunnyside	0062	\	Steep cliff	18		1
16	West Lulworkth	West Road	0063	\	Open space	17		
17	West Lulworthe	Bindon Road	0064	\	Open space	17		
18	West Lulworth	Opp Wilton Cottage	0066	4	AONB	11	4	
19	West Lulworthe	Church Road	'0067	4	AONB	11	4	
20	Winfrith Newburgh	Adj Thornicks House	0070	9	AONB/flood	26	9	1
21	Winfrith Newburgh	School Lane	0072	7	AONB/flood	15	7	
22	Winfrith Newburgh	High Street	0073	15	AONB/flood	20	15	
23	Winfrith Newburgh	High Street	0076	8	AONB	13	8	
24	Wool	Lower Hillside Rd	0080	\	Access	22		
25	Bere Regis	Tower Hill	0093	\	NP = 3	15		
26	Maple Lodge	Moreton Station	0096	15	No-constraints	15		North of A352 access to Redbridge Pit SANG
27	Winfrith Newburgh	Water Lane	0118	7	AONB/flood	9	7	
28	West Lulworth	Church Road	0113	4	AONB	9	4	
29	East Chaldon	Chydyok Road	0114	4	AONB	8	4	
30	West Lulworth	School Lan	0116	\	AONB	6		
31	Winfrith Newburgh	School Lane	0117	3	AONB	4	3	
32	East Stoke	Church land	0119	\	AONB no settle bound	23		
33	East Lulworth	Opposite Garage	0120	3	AONB	4	3	1
34	Worth Matravers	Winspit Rd	0124	\	AONB	4		
35	West Lulworth	Bindon Rd	0132	\	AONB	9		
				138		442	123	6
				% of small sites houses south of the A352 road =			89%	
				Number of small sites settlements south of the A352 = 6 out of 7				

SD93 Summary of visitor monitoring at Upton, Bog Lane and Frenches Farm SANGs

7. The monitoring reports back up the conclusions above.
8. The table below summarises the answers given to questions 2 and 6 for each SANG:

SANGS	Main activity at the site	Reasons for using each SANGS			
Frenches Farm	Dog walking - 93%	'good for dog/dog enjoys the site,'	'close to home'	'not many people',	'no need to use the car'
Bog Lane	Dog walking - 83%		'close to home'	'not many people'	
Upton Country Park	Dog walking - 88%	'good for dog/dog enjoy the site'			

9. The results of the questionnaires at the three SANG shows that proximity is very important and that the main reason why people use the SANG is dog walking.
10. These answers back up the conclusions drawn on the previous page.
11. People will not want to travel 10 to 15 miles to the Strategic SANG at Morden to walk their dogs and instead would prefer to use a much closer SANG.
12. The Wool SANGS and to a lesser extent the Redbridge Pit SANGS will be the most appropriate SANGS for the small sites.

Strategic SANGS in the north of Purbeck

13. The Local Plan Submission states on page 105 in paragraph 256 that:

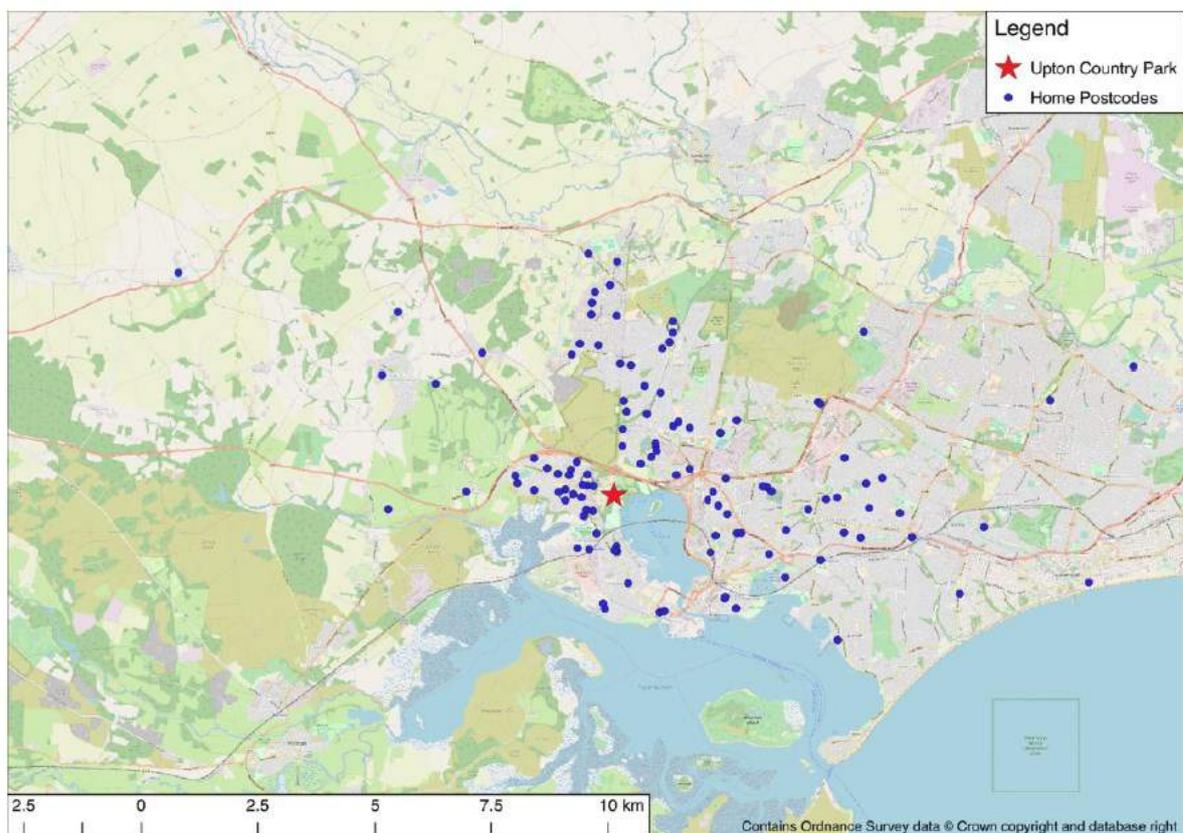
However, to mitigate for infill and windfall homes unable by virtue of their size to provide bespoke heathland mitigation measures, a strategic SANG is required in the north of Purbeck.

14. The above table and analysis of the visitor reports for the Frenches Farm, Bog Lane and Upton Country Park SANGs clearly shows that a strategic SANG in the north of Purbeck is not required.
15. The analysis clearly shows that people primarily use SANGs for dog walking and prefer to use their nearest SANG.
16. SD93 shows that the existing and planned SANGs have plenty of spare capacity.

17. The table on page 15 of SD93 states that the total spare capacity of the existing and planned SANGs is *c1682 homes*. Subtracting the Morden SANG spare capacity stated on page 14, this means that the spare capacity without the Morden SANG is $1682 - 300 = 1382$ homes.
18. SD93 page 22 states in Table 6 that the windfall expected is 809 homes.
19. Thus the unused spare capacity after taking account of windfall will be approximately $1382 - 809 = 573$ or 42% of the 1382 capacity.
20. The above analysis and my table below clearly shows that a strategic SANG is not necessary for the small sites and windfall. It is most unlikely that the spare capacity of 573 houses will all be used up with unexpected windfall.
21. The Strategic SANG is, therefore, not required at Morden to mitigate for infill, windfall and small sites. and should be deleted from Policy I5 on page 106 of the Local Plan Submission.

Holiday Park

22. SD93 page 11 Map 4 is reproduced below.



Map 4: Upton Country Park Visitor Data annotated with the position of visitor postcodes

23. The map shows that Upton County Park attracts visitors from a very wide area in the Bournemouth, Christchurch and Poole conurbation.
24. The NPPF states on page 40 in paragraph 134 that the *Green Belt serves five purposes*: and in sub-paragraph c) states:

c) to assist in safeguarding the countryside from encroachment;

25. The Upton Country Park map suggests that the proposed strategic SANG will similarly attract people from the conurbation.

26. The SANG would not, therefore, be compliant with the NPPF paragraph 134 sub-paragraph c).

27. The NPPF states on page 40 in paragraph 136 that:

Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified,

28. I have shown above that the SANG is not required to provide mitigation for the small sites, infill or windfall since there will be sufficient SANG capacity in Purbeck and Crossways to cater for these activities.
29. I have also shown that the proposed SANG at Morden would not safeguard the countryside from encroachment.
30. There are, therefore, no grounds for releasing Green Belt to create a SANG at Morden.

Other features in SD93 concerning SANGs

SD93 – Bere Farm, Lytchett Minster and Wareham Housing

31. SD93 contains a number of references to housing at Bere Farm and Lytchett Minster.
32. The Local Plan Submission January 2019 contains no allocations for housing at Bere Farm or Lytchett Minster.
33. Table 6: Revised housing land supply shows that the Wareham Neighbourhood Plan has 190 homes. The Local Plan Submission states on page 20 in Policy V1 that Wareham Neighbourhood Plan has: *300 new homes including windfall*.

34. The presence of these frequent references produces doubt about the value of SD93 as a document to support the creation of a Strategic SANG at Morden.
SD93 – SANGS functioning
35. In paragraph 22 on page 7 is a list of SANG sizes and associated catchment radii.
36. For a SANGS of 20ha+ paragraph 22 indicates a catchment radii of 5km.
37. I have produced the map below using freemaptools.com. It has a circle of radii 5km superimposed in white, centred approximately on the proposed Morden SANG and holiday park.
38. The catchment area may just include Lytchett Matravers, which according to page 7 Table 1 will have its own SANG.
39. Paragraph 21 on page 7 indicates that there is potential to deliver a SANG as part of the Wareham Neighbourhood Plan.
40. Thus within the catchment area for the proposed Morden SANG there are plans to provide 2 SANGs to cater for growth in Wareham and Lytchett Matravers.

SANG advice to Dorset Council (dated 26 July 2019)

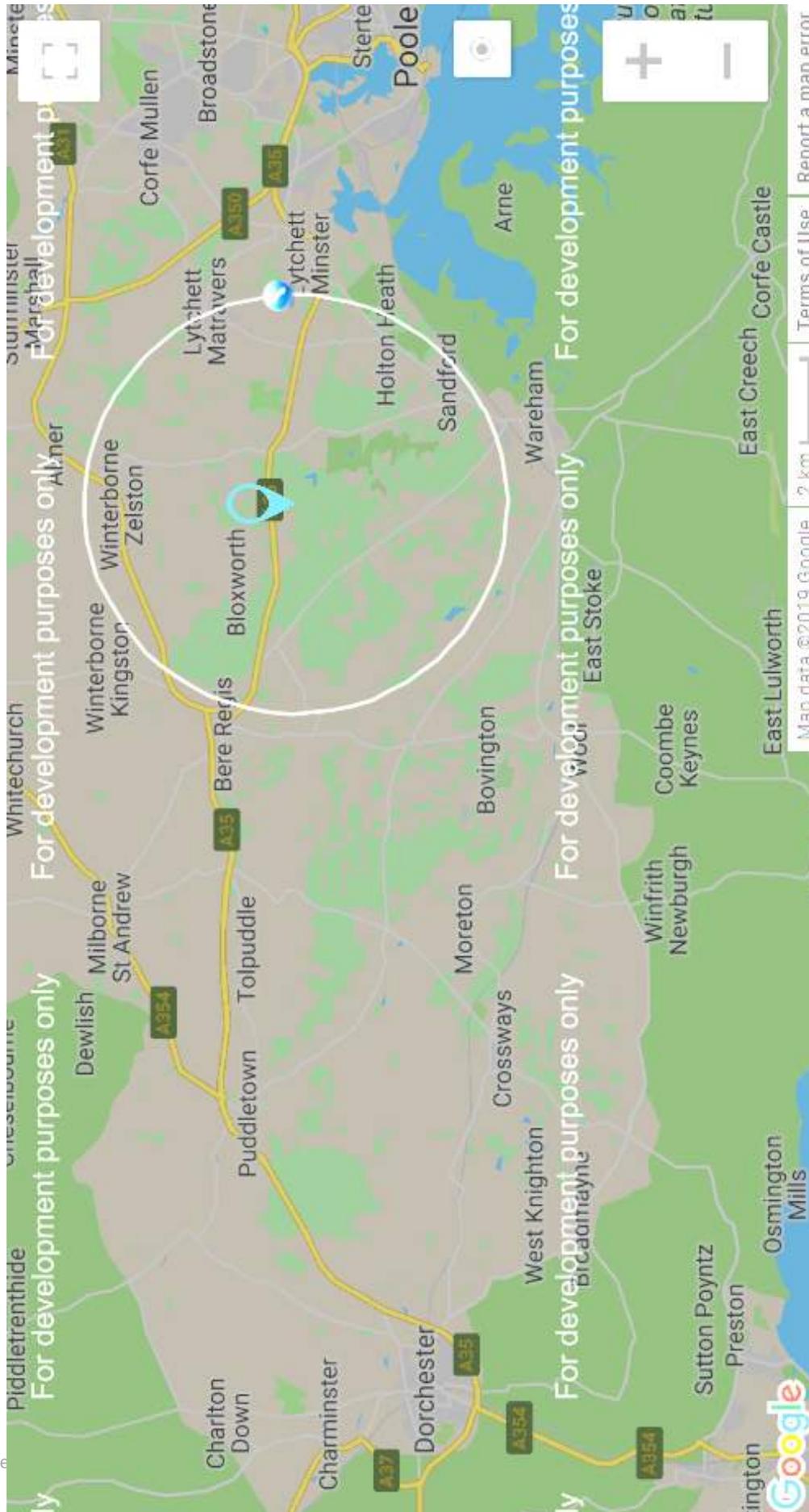
41. Natural England have submitted the following advice in their third paragraph (not numbered):

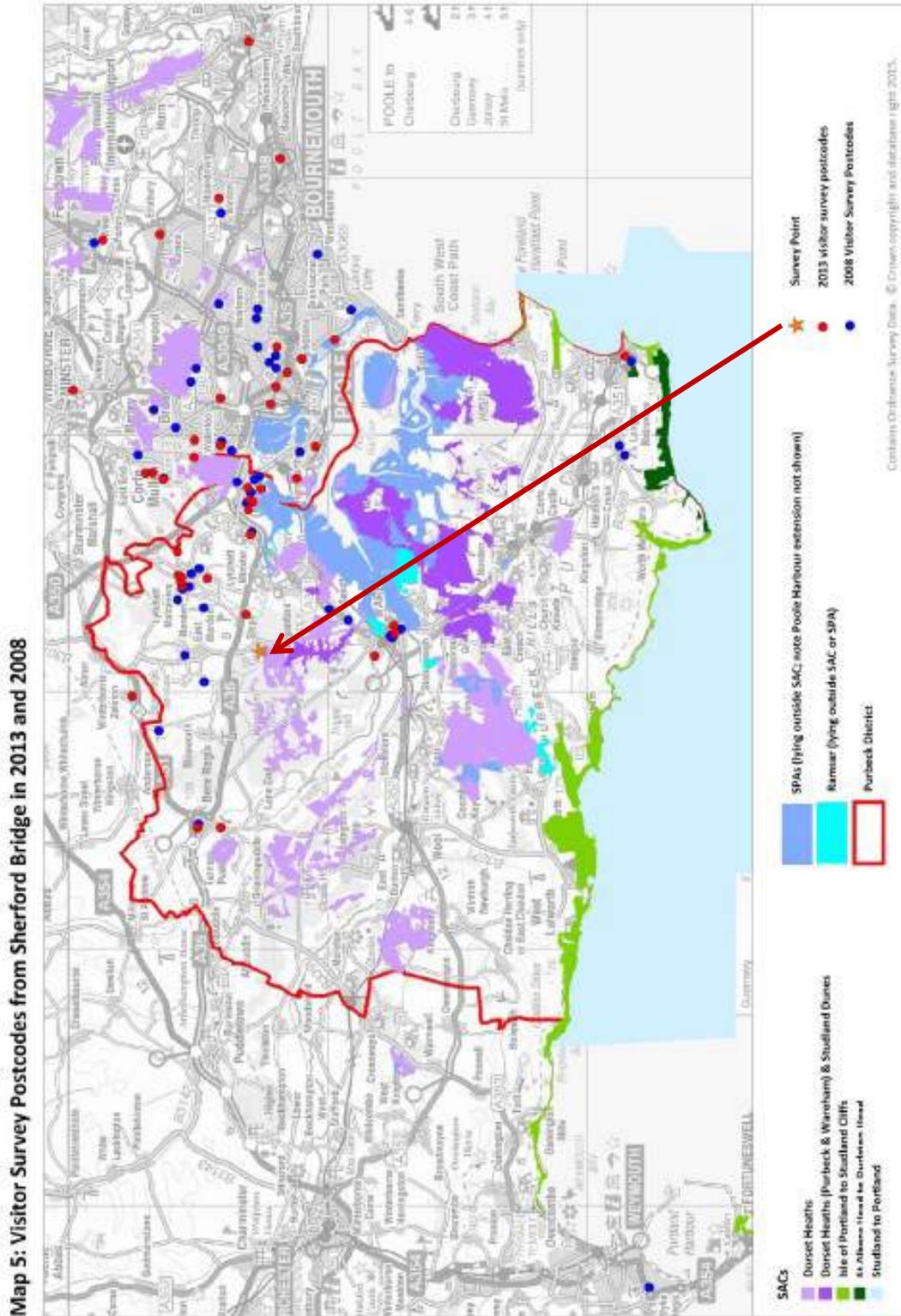
The strategic SANG at Morden Bog/Wareham Forest will be required to operate in a different way compared to SANGs linked directly to allocation sites. This is in part because of a requirement under the Habitats Regulations to implement measures to bring sites into favourable conservation status where they are not, in this case by reducing existing adverse effects as well as avoiding new effects from plans and projects. Because of its location the proposed SANG is well located to intercept and divert pressure arising from a large part of the Local Plan area (see Map 5 HRA of the Partial review of the Purbeck Local Plan Part 1: options 2016 below) well beyond the development related 5km catchment area. The authority should note that it unlikely to function in a way directly linked to specific developments across this area rather in a way which intercepts residents who are attracted by the wider appeal of the combined natural area of Morden Bog/Wareham Forest. It is also likely to intercept additional recreational pressure from existing and new residents in the BPC area.

42. Natural England state:

Because of its location the proposed SANG is well located to intercept and divert pressure arising from a large part of the Local Plan area (see Map 5 HRA of the Partial review of the Purbeck Local Plan Part 1: options 2016 below) well beyond the development related 5km catchment area.

43. The map referred to *below* is given after the 5km radius map on the next page.





44. Natural England state (advice repeated for ease of reference):

Because of its location the proposed SANG is well located to intercept and divert pressure arising from a large part of the Local Plan area (see Map 5 HRA of the Partial review of the Purbeck Local Plan Part 1: options 2016 below) well beyond the development related 5km catchment area.

45. Natural England provide no evidence or justification that the SANG will intercept and divert pressure arising from a large part of the Local Plan Area.
46. The Sherford Bridge map is not accompanied by any statistics about the number of visitors in 2013 and 2008. It also does not relate these statistics to the rate of growth of tourism in the area.
47. Crucially the map does not provide any evidence about other places that the people visited in Purbeck, and whether they would prefer to visit a new SANG at Moreden rather than other locations in Purbeck.
48. In short the map does not provide evidence to create a strategic SANG at Morden.
49. Natural England state in their fourth paragraph that:

...in the case of the Morden SANG, which is located in a sensitive position close to designated sites, its main function will be in intercepting existing residents using the c.52 car park spaces along the Morden Bog/Wareham Forest B3075 access points. In this regard Natural England advise that the SANG would have capacity to provide mitigation if required for the holiday accommodation proposed within the Park, if required and an additional level of recreational access useage equivalent to that arising from 250-300 unallocated homes within the Purbeck area.

50. In this advice Natural England state that:

...main function (of the Moreden SANG) will be in intercepting existing residents using the c.52 car park spaces along the Morden Bog/Wareham Forest B3075 access points.

51. Natural England provide no statistics on the number of cars which use the c52 car park spaces.
52. The role of the SANG appears to change from:

- a. *...to mitigate for infill and windfall homes in the Local Plan page 105 paragraph 255.*
to
- b. *to intercept and divert pressure arising from a large part of the Local Plan area (NE 3rd paragraph).*
to
- c. *intercepting existing residents using the c.52 car park spaces along the Morden Bog/Wareham Forest B3075 access points. – Natural England 3rd paragraph (NE 4th paragraph).*
to
- d. *provide mitigation if required for the holiday accommodation proposed within the Park (NE 4th paragraph).*
to
- e. *and an additional level of recreational access useage equivalent to that arising from 250-300 unallocated homes within the Purbeck area (NE 4th paragraph)*

53. I have shown that it is not necessary to create a SANG at Morden for the reason in paragraph 52.a – mitigate windfall, infill and small sites.
54. Natural England have provide no evidence to substantiate reason 52.b. – intercept and divert pressure.
55. Natural England say that paragraph 52.c. is *the main reason* but provide no evidence.
56. The creation of the holiday park will create additional traffic on already crowded roads and be remote from sustainable transport – the train. The holiday park would be counter to the NPPF Green Belt guidance on page 40 sub-paragraph 134 c) *to assist in safeguarding the countryside from encroachment.*
57. I have shown above that there is ample spare capacity in the present and planned SANGs adjacent to towns and villages to cope with this possible requirement.

Overall Conclusion

58. All the reason for creating a SANG at Morden, summarised above, have been shown to be insufficient to proceed with a SANG at Morden.

Recommendation

59. The requirement for a SANG at Morden should be deleted from the Local Plan .

Holiday Park

60. The Local Plan Submission contains no details about the proposed holiday park.
61. It would be entirely wrong to proceed with a Local Plan which includes a Green Belt holiday park for which no detail is given in the Local Plan Submission besides that it would be ... *at the junction of the A35 and B3075 roads* (Local Plan Submission, page 105, paragraph 256).
62. The Charborough Estate has provided a less than convincing *Additional submission to Purbeck D.C. covering: Assessment of Alternative Non Green Belt Sites.*
63. It seems rather absurd to provide maximum protection to the Green Belt from development, as indicated in the NPPF in Chapter 13 (page 40) and at the same time allow the development of a holiday park in the Green Belt simply because a landowner wants to create a holiday park.
64. The NPPF requires on page 40 in paragraph 136 that:

....exceptional circumstances are fully evidenced and justified,

65. Neither the Local Plan Submission nor the Charborough Estate document state what the exceptional circumstances are for the creation of the proposed holiday camp.
66. There is no indication in the Local Plan Submission, in terms of a summary and references, that formal evidence exists which *fully evidenced and justified* the exceptional circumstance.

Recommendation

67. I recommend that the creation of a holiday park in the Green Belt in an area containing a number of sensitive locations and features, is deleted from the Local Plan.

SD92: Addendum to Sustainability Appraisal 2019 [SD02]

SD92**Introduction** (page 2)

1. SD92 states in paragraph 6 that Moreton Station is a key service village.
2. It is not a key service village.
3. Crossways is not identified as a key service village in the West Dorset Preferred Options Consultation August 2018.
4. In his Report on the Examination into the West Dorset, Weymouth and Portland Joint Local Plan, dated 14 August 2015 (the extant West Dorset Local Plan), Mr Paul Crysell stated on page 33 in paragraph 165 that:

Crossways is close to Dorchester but without substantial enhancements to transport links I do not consider it is a particularly sustainable option for meeting the longer term needs of the county town.

5. Mr Crysell also stated on page 31 in paragraph 153 that:

Crossways lies close to the District's eastern boundary with Purbeck District and functions as a dormitory settlement....

6. Thus Crossways is officially a dormitory and is not a particularly sustainable option for meeting the longer term needs of the county town.
7. As a dormitory Crossways cannot be a key service village.
8. There have been no changes to the transport links referred to by Mr Crysell and hence the village is not particularly sustainable.
9. The 2011 Census showed that only 1.9% of Crossways residents travelled to work by train and DCC transport section stated that only 2% of the Crossways population use the bus service

Paragraph 13 page 3

10. The Options Consultation June 2016 stated on page 31 that

The Council's preferred option is for around 350 homes in this location

11. It is the 350 figure which should be in the SHMA and not 600 homes.

Paragraph 19 (page 4)

12. This paragraph quotes for the NPPF for Green Belt areas and AONBs

13. Purbeck does have the exceptional circumstances to develop in the AONB and use the Lytchett Minster site. I have shown in my comments on SD85, that 32% of Purbeck's housing allocation is in a community containing 1% of Purbeck's population and that housing will be at least 10 miles from 79% of Purbeck's households.

14. Approximately 38% of the 516 affordable homes which will be derived from the allocations will be at Redbridge Pit. These affordable houses, in a community of only 83 houses, will be at least 10 miles from 79% of the population of Purbeck.

15. Thus I have shown in SD85 and SD98 that Purbeck does have very convincing reasons, the context of the advice in the NPPF to develop in the AONB and in the Green Belt contrary to the statements in paragraph 19.

Paragraph 22 (page 5)

16. This states that the *most popular option* was the option which had *a spread of development*. But directly contrary to the public's preference, Purbeck Council raised the housing growth for Redbridge Pit to as close to its maximum capacity as possible (555 houses + 15 houses = 570 houses).

Paragraph 26 (page 5)

17. The sites at Lytchett Minster and West of Wareham are eminently suitable sites as I have shown in SD94

Environmental Baseline (page 6)

18. This figure emphasises the points that I have raised in my paragraphs above, that adherence to a strict prohibition on development in the AONB and Green Belt means that the largest allocation of housing in Purbeck will be over 10 miles from 79% of Purbeck's population.

19. This is particularly injurious for people who want affordable housing or care facilities. Then largest allocation of affordable homes and one of the 2 care facilities will be over 10 miles west of the Worgret Bridge and from where people currently live.

20. The Environmental Baseline includes Crossways which Purbeck emphatically and formally told me had nothing to do with the Purbeck Local Plan.

Social Baseline (pages 8 to 14)

21. Of the 11 graphs of social statistics, only one has the source of its statistics.

22. Almost all the graphs include Crossways.

23. Having studied the 2011 census statistics in depth I disagree with some of the conclusions drawn from the statistics.

24. Far more value is gained by studying the Census statistics.

25. The majority of the graphs do not have much relevance to the task of allocating housing.

26. Some of the graphs have the merit of supporting the point that I have consistently raised, that Moreton Station and Crossways are not Key Service Villages.

27. By linking Moreton Station with Crossways the graphs also emphasise that putting the largest allocation of market and affordable housing and care facilities in Redbridge Pit will effectively take them out of Purbeck and deny them to the 79% of Purbeck residents who live over 10 miles from Redbridge Pit.

28. Very surprisingly there is not graph or set of statistics which shows how many people travel by train to work. I have included this in my response to SD94 and have included it in my sheet showing key Purbeck statistics, shown on the next page.

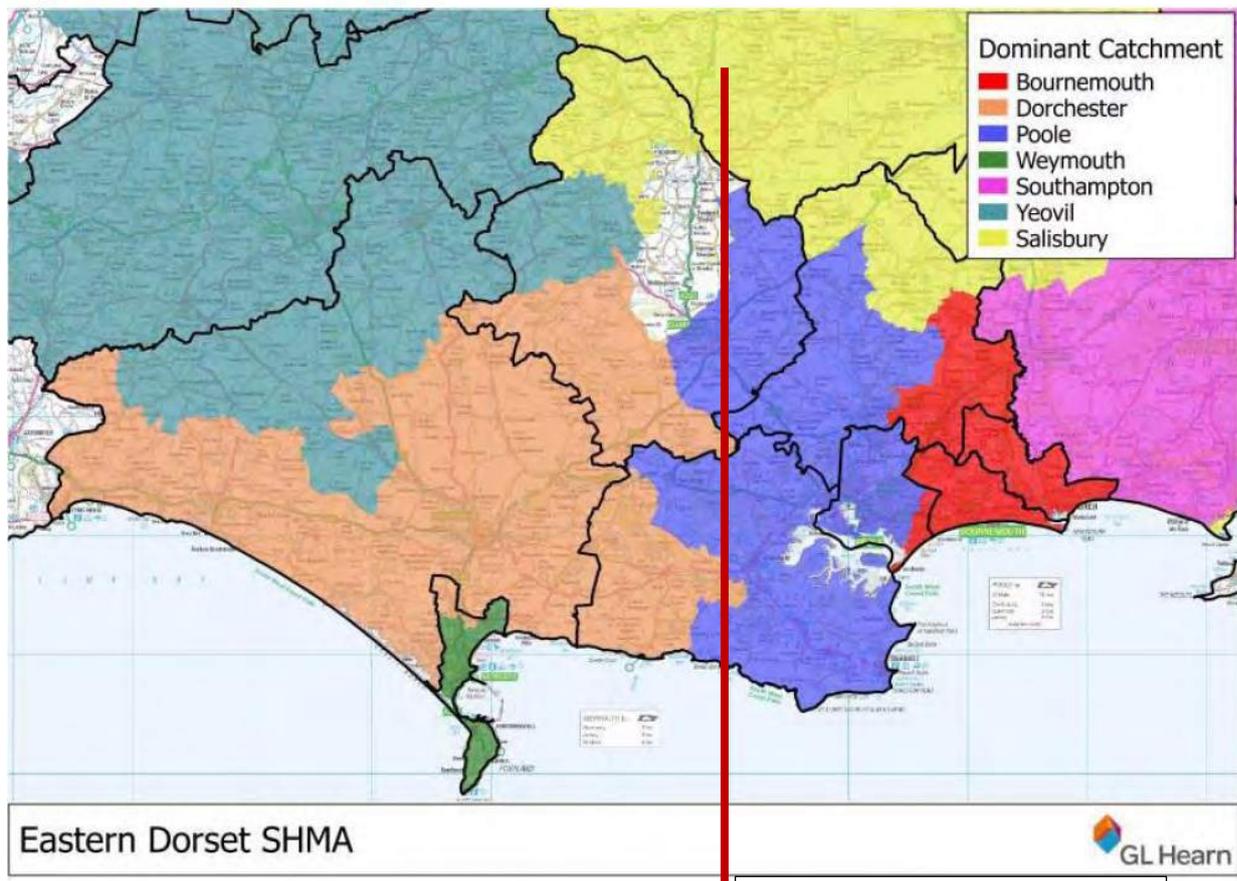
Age Structure (KS102EW)		Industry (CS605EW)		Occupation (KS608EW)		Qualifications Gained (OS502EW)	
All ages	4873	Usual residents aged 16-74 in employment	21419	All occupations	21419	All usual residents aged 16 and over	37678
0-4	2114	A. Agriculture, forestry and fishing	423	1. Managers, directors and senior officers	2643	1. No qualifications	8122
5-7	1315	B. Mining and quarrying	139	2. Professional occupations	2957	2. 1-4 O levels/CSE/GCSE(any grades, Entry level, Foundation Diploma	13716
8-9	899	C. Manufacturing:	1904	3. Associate professional and technical occupations	2668	3. NVQ Level 1, Foundation NVQ, Basic skills	2921
10-14	2428	C10-22 Manufacturing: Food, beverages, tobacco	142	4. Administrative and secretarial occupations	2325	4. 5+O level (Passes)/CSEs (Grade 1)/GCSEs (Grades A-C), School Certificate, 1 A level/2-3 AS levels/VCEs, Higher Diploma, Welsh Baccalaureate Intermediate Diploma	13380
15	539	C13-15 Manufacturing: Textiles, wearing apparel, leather+related products	49	5. Skilled trades occupations	3371	5. NVQ Level 2, Intermediate NVQ, City and Guilds Craft, BTEC First/General Diploma, RSA Diploma	6170
16-17	1110	C16-17 Manufacturing: Wood, paper, and paper products rubber and plastic	36	6. Caring, leisure, and other services occupations	2173	6. Apprenticeship	3303
18-19	885	C19-22 Manufacturing: Chemicals, chemical produce	170	7. Sales and customer services occupations	1549	7. 2+ A levels/VCEs, 4+AS levels, Higher School Certificate, Progression/Advanced Diploma, Welsh Baccalaureate Advanced Diploma	6147
20-24	2165	C23-25 Manufacturing: Low tech	448	8. Process, plant and machine operatives	1361	8. NVQ Level 3, Advanced NVQ, City and Guilds Advanced Craft, ONC, OND, BTEC National, RSA Advanced Diploma	4539
25-29	1998	C26-30 Manufacturing: High tech	690	9. Elementary occupations	2372	9. Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE)	4868
30-44	7385	C18,31,32 Manufacturing: other	367	10. D, Electricity, gas, steam, and air conditioning supply	112	10. NVQ Level 4-6, HNC, RSA Higher Diploma, BTEC Higher Level	1849
45-59	9465	D, Electricity, gas, steam, and air conditioning supply	112	11. Accommodation and food services activities	1780	11. Professional qualification (for example teaching, nursing, accountancy)	6210
60-64	3723	E. Water supply, sewerage, waste management + remediation	205	12. Information and communication	523	12. Other vocational/work-related qualification	8026
65-74	5648	F. Construction	1838	13. Not in employment	10960	13. Foreign qualification	879
75-84	3767	G. Wholesale and retail trade; repair of motor vehicles and motor cycles	2929	Travel to Work TTW:(OS701EW), Age: (KS102EW)			879
85-89	1038	H. Transport and storage	718	Usual residents aged 16 to 74 by their method of travel to work			879
>90	494	I. Accommodation and food services activities	1780	All categories: Method of travel to work			879
Mean age	44.87	J. Information and communication	523	1. Work mainly at or from home	32379	1. A level/2-3 AS levels/VCEs, Higher Diploma, BTEC Higher Level	1849
Median age	47	K. Financial and insurance activities	643	2. Underground, metro, light rail, tram	1690	11. Professional qualification (for example teaching, nursing, accountancy)	6210
18-74	31269	L. Real Estate activities	339	3. Train	419	12. Other vocational/work-related qualification	8026
		M. Professional, scientific and technical activities	1098	4. Bus, minibus, or coach	390	13. Foreign qualification	879
		N. Administrative and support service activities	886	5. Taxi	42		
		O. Public, administrative and defence; compulsory social security	2027	6. Motorcycle, scooter, or moped	285		
		P. Education	1936	7. Driving a car or van	13900		
		Q. Human health and social work activities	2583	8. Passenger in a car or van	1036		
		R. S. Arts, entertainment and recreation; other service activities	1301	* Total in a car or van	14936		
		T. Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use	31	9. Bicycle	634		
		U. Activities of extraterritorial organisations and bodies	4	10. On foot	2808		
				11. Other method of travel to work	182		
				12. Not in employment	10960		
				% in employment TTW:(OS701EW), Age: (KS102EW)			
				Number in employment	21419		
				Total population (from top of age table)	44973		
				% of population in employment	47.6%		
				Number in employment	21419		
				Number of people aged 18-74	31269		
				% of working age in employment	68.5%		

Age Structure	Industry	Occupation	Qualifications Gained
18-74	31269	21419	37678
19.07/6/19.07.22.0x	19.07/6/19.07.14. v.9.1		

Travel by train - Purbeck 2011 Census	Industry	Occupation	Qualifications Gained
1.3%	High tech manufacturing + ICT +	44973	13380
Above	High tech manufacturing + ICT +	44973	13380
below	High tech manufacturing + ICT +	44973	13380
Purbeck	High tech manufacturing + ICT +	44973	13380
Dorchester	High tech manufacturing + ICT +	44973	13380
Crossways	High tech manufacturing + ICT +	44973	13380
Wool	High tech manufacturing + ICT +	44973	13380
Wareham	High tech manufacturing + ICT +	44973	13380
Swanage	High tech manufacturing + ICT +	44973	13380

29. The graphs also do not highlight that Moreton Station and Crossways are very orientated towards Dorchester whereas areas east of the Worgret Bridge where 79% of Purbeck residents live are orientated towards Poole and Bournemouth. This is indicated on Figure 7 in the SHMA page 28, shown below:

Figure 7: Dominant Catchment



Source: ONS, 2011

79% of Purbeck households are To the east of a line through the Worgret bridge just outside Wareham

30. The division in catchment areas in Purbeck roughly corresponds to my 79% statistic. I have drawn a line just to the west of Wareham showing the region to the east which contains 79% of Purbeck’s households.

31. Whilst there is value in analysing the area it is best done using the statistics themselves. For example my Purbeck – 2011 Census result sheet above shows that an analysis of the educational qualifications and employment of the people in Purbeck and Crossways clearly indicates that extremely few would gain employment in the high tech specialisations upon which the Winfrith Innovation Centre is founded. This is not a criticism of the Purbeck and Crossways population, it’s just that extremely few people in the Britain have the qualifications and skills to be proficient at, say, cyber security to the level of those in Israel or Russia, which is why such activities in

Britain are focused on large cities where the pool of expertise and associated university departments are located. I have covered this in my response to these documents and to consultations on the iterations of the Local Plan.

Moreton Station

Baseline assessment of Moreton Station (incorporating Crossways) (page 22)

Paragraph 89 (page 22)

32. This is a very confused paragraph.
33. As I have already stated using quotes from the West Dorset Local Plan Inspector's report of 14 August 2015, Crossways is officially a dormitory and West Dorset do not use the term Key Service Village.
34. Furthermore Crossways just does not have the attributes of a key service village. It is a dormitory of Dorchester.
35. Paragraph 89 states that Crossways has *growth proposed*. It is more than just proposed, it has been approved and some work has started. The growth proposed is significantly higher than that for Redbridge Pit, but is very close to Redbridge Pit and will directly impact the residents of the proposed Redbridge Pit settlement.
36. The paragraph states that Moreton station has a population of 389. This is wrong. Moreton Station has 83 houses and hence at a ratio of about 2.5 persons per house (Purbeck Housing Needs Survey July 2016) this equate to about 207 people. The population of the whole of Moreton was 391 in 158 dwellings in July 2016 (source: Purbeck District Council Housing Needs Survey, page 4).
37. The facilities at Moreton Station are the station and a pub, that's it. There is no bus service at Moreton Station. The train service is hourly except in the morning when there are 3 extra trains in each direction between 6am and 9am (source : South Western Railway timetable 28, 19 May to 14 December 2019, weekdays, pages not numbered).

Paragraph 90 (page 23)

38. This paragraph states at the top of page 23 that *There are few people requiring housing in Moreton Station.*

39. Purbeck District Council conducted a Parish Housing Needs Survey in July 2016. This showed on page 5 of the report that: *1 households meet the District Council's criterion for rented affordable housing (1% of occupied households).*

Paragraph 92

40. Employment in Crossways is focussed on public administration but not on defence. The overwhelming majority of people travel by car to work in Dorchester and to a lesser extent Weymouth (West Dorset District Council Rural Functionality Study, not dated but about 2008)

41. The figure below shows the 2011 Census results for Crossways employment by industry. The corresponding results for Moreton are shown on the following page.

42. I produced the sheets for the Mineral Sites Plan Examination in October 2018 which is why Mining and quarrying are highlighted.

Crossways - Industry - Census 2011		E00104151										E00104157					
Census codes: E00104151 to E00104157		51	52	53	54	55	56	57	Crossways totals			Crossways					
All categories		All										All			All		
A	Agriculture, forestry and fishing	4	6	2	1	0	4	6	23	2.1%	Agricult, forest + fish			G	170	15.8%	
B	Mining and quarrying	1	3	3	3	0	0	3	13	1.2%	B Mining and quarrying			O	144	13.4%	
C	Manufacturing	9	22	12	12	0	19	3	77	7.1%	C Manufacturing			Q	144	13.4%	
C.10-12	Food, beverages and tobacco	0	4	1	4	0	0	2	11	1.0%	C.10-12 Food, bev + tobacco			F	95	8.3%	
C.13-15	Textiles, wearing apparel, leather and related products	3	3	0	0	0	0	0	6	0.6%	C.13-15 Textiles, related prods			C	77	7.1%	
C.16.17	Wood, paper and paper products	0	0	0	0	0	0	0	0	0.0%	C.16.17 Wood, paper			I	62	5.8%	
C.19-22	Chemicals, chemical products, rubber and plastic	0	0	1	0	0	2	0	3	0.3%	C.19-22 Chemicals+ plastic			M	60	5.6%	
C.23-25	Low tech	2	6	1	2	0	7	1	19	1.8%	C.23-25 Low tech			N	55	5.1%	
C.26-30	High tech	2	5	6	2	0	4	0	19	1.8%	C.26-30 High tech			R,S	45	4.2%	
C.18.31.32	Other	2	4	3	4	0	6	0	19	1.8%	C.18.31.32 Other			H	28	2.6%	
D	Electricity, gas, steam and air conditioning supply	0	1	3	1	0	2	0	7	0.6%	D Elect, gas, st+AC			A	23	2.1%	
E	Water supply, sewerage, waste management and remediation activities	0	1	2	3	2	0	1	9	0.8%	E Water, sew, waste			C.23-25	19	1.8%	
F	Construction	12	14	16	12	9	15	11	89	8.3%	F Construction			C.26-30	19	1.8%	
G	Wholesale and retail trade; repair of motor vehicles and motor cycles	18	45	25	12	12	33	25	170	15.9%	G Wholesale and retail vehicles			C.18.31.32	19	1.8%	
H	Transport and storage	3	8	2	0	6	3	6	28	2.6%	H Transport and storage			K	19	1.8%	
I	Accommodation and food service activities	9	16	8	4	3	8	14	62	5.8%	I Accommo+ food			L	18	1.7%	
J	Information and communications	3	7	0	3	0	4	0	17	1.6%	J Info + comms			J	17	1.6%	
K	Financial and insurance activities	0	1	8	1	0	6	3	19	1.8%	K Fin + ins			B	13	1.2%	
L	Real estate activities	4	3	1	4	2	4	0	18	1.7%	L Real estate activities			C.10-12	11	1.0%	
M	Professional, scientific and technical services	5	18	9	3	3	16	6	60	5.6%	M Prof, sci + tech			E	9	0.8%	
N	Administrative and support services activities	3	10	11	9	3	4	15	55	5.1%	N Admin + supp			D	7	0.6%	
O	Public administration and defence; compulsory social security	5	32	10	9	1	23	15	144	13.4%	O Pub admin-def, soc sec			C.13-15	6	0.6%	
P	Education	5	29	20	20	8	25	23	144	13.4%	P Education			C.19-22	3	0.3%	
Q	Human health and social work activities	19	29	20	20	8	25	23	144	13.4%	Q Health+ social work			T	3	0.3%	
R,S	Arts, entertainment and recreation; other service activities	5	8	7	5	6	6	8	45	4.2%	R,S Arts, ent, recreat			C.16.17	0	0.0%	
T	Activities of households as employers; undifferentiated goods and services - producing activities of households for own use	0	1	0	0	0	0	2	3	0.3%	T Households, undifferentiated goods			U	0	0.0%	
U	Activities of extraterritorial organisations and bodies	0	0	0	0	0	0	0	0	0.0%	U Extraterritorial orgs			R,S,T,U	0	0.0%	
Total		105	252	157	120	62	224	158	1078		Total						
		51	52	53	54	55	56	57									

Crossways Industry - sorted by numbers employed in each sector

All categories	All	1078
G Wholesale and retail trade; repair of motor vehicles and motor cycles	G	170
O Public administration and defence; compulsory social security	O	144
Q Human health and social work activities	Q	144
P Education	P	95
F Construction	F	89
C Manufacturing	C	77
I Accommodation and food service activities	I	62
M Professional, scientific and technical services	M	60
N Administrative and support services activities	N	55
R,S Arts, entertainment and recreation; other service activities	R,S	45
H Transport and storage	H	28
A Agriculture, forestry and fishing	A	23
C.23-25 Low tech	C.23-25	19
C.26-30 High tech	C.26-30	19
C.18.31.32 Other	C.18.31.32	19
K Financial and insurance activities	K	19
L Real estate activities	L	18
J Information and communications	J	17
B Mining and quarrying	B	13
C.10-12 Food, beverages and tobacco	C.10-12	11
E Water supply, sewerage, waste management and remediation activities	E	9
D Electricity, gas, steam and air conditioning supply	D	7
C.13-15 Textiles, wearing apparel, leather and related products	C.13-15	6
C.19-22 Chemicals, chemical products, rubber and plastic	C.19-22	3
T Activities of households as employers; undifferentiated goods and services - producing activities of households for own use	T	3
C.16.17 Wood, paper and paper products	C.16.17	0
U Activities of extraterritorial organisations and bodies	R,S,T,U	0

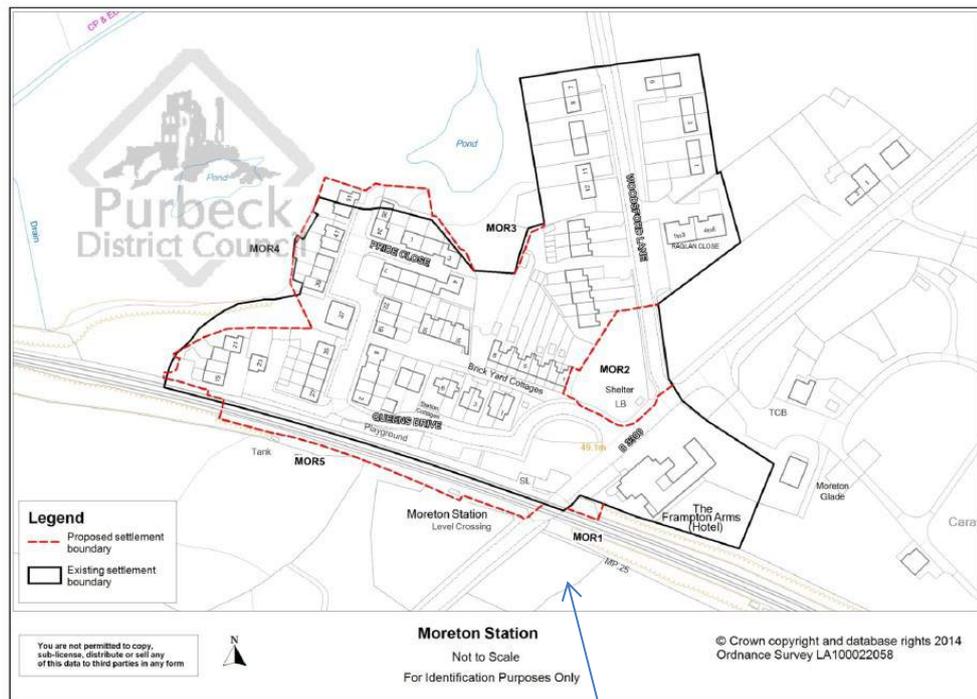
Moreton - Industry - Census 2011		E00103880	
All usual residents aged 16 to 74 in employment the week before the census			
All	All categories	All	209
A	Agriculture, forestry and fishing	A	14
B	Mining and quarrying	B	1
C	Manufacturing	C	20
C 10 - 12	Food, beverages and tobacco	C10-12	2
C 13 - 15	Textiles, wearing apparel, leather and related products	C13-15	0
C 16,17	Wood, paper and paper products	C16,17	2
C 19 - 22	Chemicals, chemical products, rubber and plastic	C19-22	0
C 23 - 25	Low tech	C23-25	8
C 26 - 30	High tech	C26-30	5
C 18,31,32	Other	C18,31,32	3
D	Electricity, gas, steam and air conditioning supply	D	0
E	Water supply, sewerage, waste management and remediation activities	E	1
F	Construction	F	14
G	Wholesale and retail trade; repair of motor vehicles and motor cycles	G	22
H	Transport and storage	H	6
I	Accommodation and food service activities	I	17
J	Information and communications	J	6
K	Financial and insurance activities	K	6
L	Real estate activities	L	4
M	Professional, scientific and technical services	M	7
N	Administrative and support services activities	N	10
O	Public administration and defence; compulsory social security	O	32
P	Education	P	16
Q	Human health and social work activities	Q	21
R,S	Arts, entertainment and recreation; other service activities	R,S	12
T	Activities of households as employers; undifferentiated goods and services - producing activities of households for own use	T	0
U	Activities of extraterritorial organisations and bodies	U	0
	Total	R,S,T,U	209
			E00103880
			6.7%
			0.5%

Moreton - industry		E00103880	
Sorted by numbers employed in each sector			
All	All categories	All	209
O	Public administration and defence; compulsory social security	O	32
G	Wholesale and retail trade; repair of motor vehicles and motor cycles	G	22
Q	Human health and social work activities	Q	21
C	Manufacturing	C	20
I	Accommodation and food service activities	I	17
P	Education	P	16
A	Agriculture, forestry and fishing	A	14
F	Construction	F	14
R,S	Arts, entertainment and recreation; other service activities	R,S	12
N	Administrative and support services activities	N	10
C 23 - 25	Low tech	C23-25	8
M	Professional, scientific and technical services	M	7
H	Transport and storage	H	6
J	Information and communications	J	6
K	Financial and insurance activities	K	6
C 26 - 30	High tech	C26-30	5
L	Real estate activities	L	4
C 18,31,32	Other	C18,31,32	3
C 10 - 12	Food, beverages and tobacco	C10-12	2
C 16,17	Wood, paper and paper products	C16,17	2
B	Mining and quarrying	B	1
E	Water supply, sewerage, waste management and remediation activities	E	1
C 13 - 15	Textiles, wearing apparel, leather and related products	C13-15	0
C 19 - 22	Chemicals, chemical products, rubber and plastic	C19-22	0
D	Electricity, gas, steam and air conditioning supply	D	0
T	Activities of households as employers; undifferentiated goods and services - producing activities of households for own use	T	0
U	Activities of extraterritorial organisations and bodies	U	0
		R,S,T,U	5.7%

Moreton Station’s capacity for growth (page 23)

- 43. The capacity does not include the 65 care facilities houses.
- 44. Redbridge Pit has nothing to do with Moreton Station. As the boundary map of Moreton Station below show, it is the caravan park which is closest to Moreton Station but is not adjacent to Moreton Station settlement boundary.

Map of the existing and proposed settlement boundary



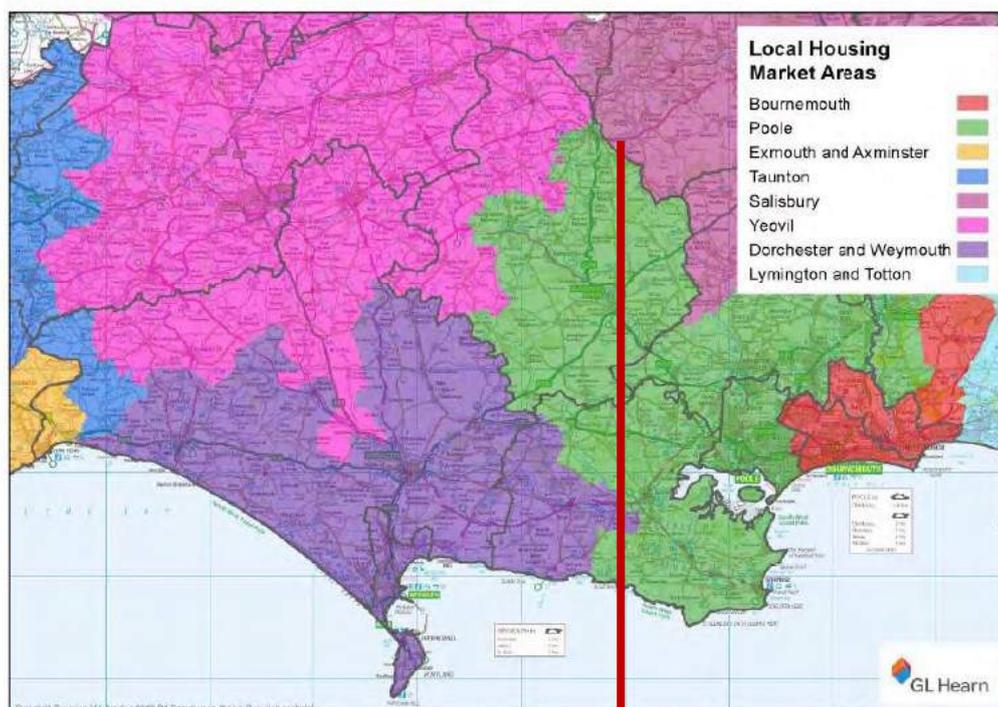
Caravan park – SHLAA/0048

- 45. Redbridge Pit is directly adjacent to Crossways on Redbridge Road.
- 46. I have included my Encirclement map on the following page to show that Redbridge Pit is an integral part of the housing development around Crossways which totals 1689 houses. Crossways currently has about 1100 houses and so the total growth is about 153%.
- 47. The developers of the Summer Farm development originally included 3.5ha of employment land but following a report by a Dorchester estate agent the amount of employment land was reduced to 2.5ha because of the lack of demand.

Growth at Moreton Station paragraphs (page 23 paragraphs 93 -95)

- 48. Paragraphs 93 to 95 focus entirely on Moreton Station. As the Encirclement map shows there is already extensive growth around Crossways and it is wrong to consider growth at Moreton Station in isolation from Crossways.
- 49. The creation of the Dorset Council means that there is no longer a demarcation line between Purbeck and West Dorset District Councils and the Eastern and Western Housing Markets along Redbridge Road.
- 50. The SHMA CURDS – defined local housing markets represent a more realistic housing market for the area. A copy of the SHMA map on page 23 is shown below.

Figure 3: CURDS-Defined Local Housing Market Areas



Source: CURDS

79% line – 79% of Purbeck households
Are to right of this line

- 51. I have drawn my 79% line on the map. It illustrates that Moreton and Crossways are not part of the same housing market as approximately 79% of Purbeck’s households.
- 52. The SD92 discussion of growth at Moreton Station as though it served Purbeck District is, therefore, wrong.

53. Growth at Moreton and Crossways should be taken together and recognised that it serves Dorchester and to a lesser extent Weymouth, and not the 79% of Purbeck settlements east of the 79% line through Worgret Bridge just outside Wareham.

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

A review by
M N Hill – ID No 1188470
10 September 2019

Contents

1. This comment on SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit is sub-divided into the following sections:

- A. Introduction.
- B. Summary
- C. SD94 – Comment on each paragraph
- D. SD94 – Other documents.
- E. SD94 - Redbridge Pit and Crossways
- F. SD94 - Crossways
- G. SD94 - Summer Farm
- H. SD94 - 79% of Purbeck Population live east of Worgret Bridge.
- I. SD94 - Future technologies
- J. SD94 – Alternative sites
- K. SD94 – Housing Market Areas
- L. SD94 – Moreton Station Settlement boundary

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

A. Introduction

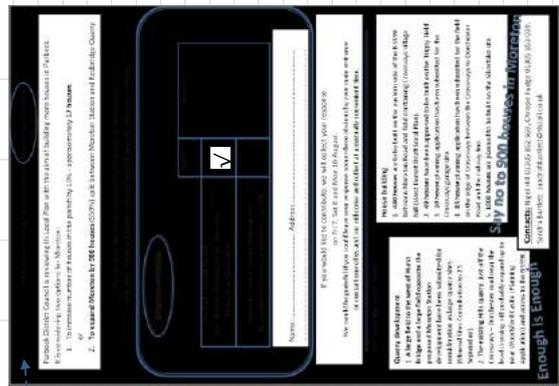
1. In this paper I will review the 4 paragraphs in SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit.
2. I have produced a table of showing the evolution of the housing numbers starting with the January 2015 SHLAA and January 2015 Issues and Options Consultation. I refer to the Evolution table in my review of SD94. I have concentrated on the housing numbers which were in the consultation documents and seen by members of the public. Hence my Evolution using the published documents is significantly different from SD94.
3. The Evolution table is shown at the end of this section
4. The Evolution table shows that the proposed Redbridge Pit development represents a 653% increase on the size of Moreton Station. Excluding Moreton Station/Redbridge Pit, the average housing increase in the Local Plan Submission is 10.5%. This is not stated in SD94.
5. I have used extracts from the Purbeck Local Plan Submission SHLAA January 2019 to show that the proposed Redbridge Pit development has nothing to do with Moreton Station and would instead become an integral part of Crossways, and the West Dorset housing supply.
6. The evolution table shows on the top right hand side that the proposed 555 houses on Redbridge Pit represents a 50% increase in the size of Crossways excluding any other developments. Including the 500 house Summer Farm and approved Land adjacent to Oaklands Park (49 houses) and Frome Valley Road (140 houses) the total WDDC approved (689) and Purbeck planned (555) houses for Crossways is 1239, a 113% increase. This is not covered in SD94.
7. The total approved and planned housing development in Crossways, as shown on the Evolution table, is 2913 houses which represents a 265% increase in the number of houses in Crossways. This is not mentioned in SD94, or the Submission Local Plan or SHLAA documents but should have been.
8. SD94 and the 2019 Purbeck Local Plan Submission Draft almost totally ignore the developments in Crossways, and I have therefore included my map of the Crossways-Moreton area to emphasise the extent to which SD94 ignores developments in the area. None of the Purbeck maps in any of their publications shows all the housing and quarrying developments in the Crossway-Moreton area, but should have done.

9. The one and only occasion that Purbeck displayed a map showing all the developments was at the New Homes for Purbeck drop-in event in Moreton Village Hall on 10th March 2018. I had attended all the previous New Homes for Purbeck drop-in events, except the one at Bere Regis which was reprogrammed at short notice due to inclement weather. At each of the drop-in events I complained to the Purbeck staff that the map for Moreton at the event and in the New Homes for Purbeck document upon which all Purbeck and Crossways households were asked to comment did not show all the other housing and quarrying developments in the Moreton-Crossways area. Thus, a member of the planning staff made a point at the Moreton drop-in event of pointing out the map to me.
10. I had earlier circulated a map showing all the proposed housing and quarrying in the Moreton-Crossways area to all households in Moreton and Crossways and hence the Purbeck drop-in event map whilst finally welcome, was not new to the attendees at the drop-in event.
11. Unfortunately, the rest of Purbeck have never been shown a map showing all housing and quarrying in the Moreton-Crossways area in any publication or drop-in event.
12. Whilst not considering all developments in the Moreton-Crossways area the Purbeck Local Plan SHLAA Submission document does present a far more realistic description of the proposed Redbridge Pit development than the Local Plan Submission.
13. SD94 does not mention the 500 house Summer Farm development (50% increase on current Crossways housing) and, therefore, I have included material produced by the first developers of the site to highlight that Summer Farm will be a very significant development only yards away from Redbridge Pit. The initial developers had their outline planning application approved by West Dorset Council.
14. Subsequently the initial developers sold the site to another set of developers who wish to make significant changes to the development of the site including deferring the building of a health centre, hence they have had to submit a new planning application which is due to be considered by Dorset Council in September 2019. This is not mentioned in SD94 but should have been.
15. In describing the changes to the housing numbers at Moreton Station/Redbridge Pit, SD94 provides no perspective of the sizes of the proposed developments in comparison to allocations to the other locations in the Local Plan Submission Draft. I have therefore provided the percentage increases for all the allocations in the Local Plan Submission Draft which shows that average housing increase as a result of all the allocations, excluding Redbridge Pit will be 10.5%, with Wool's 22% increase being the largest. By comparison the Moreton Station/Redbridge Pit allocation represents a 653% increase for Moreton Station. This not mentioned in SD94 or the Submission Local Plan or SHLAA, but should have been.

16. The Redbridge Pit proposed development represents a 50% increase in the size of Crossways if all other West Dorset proposals are ignored. But since the Summer Farm (500 houses) is in the extant West Dorset District Plan and has already received outline planning approval once, and the Land west of Highlands Park (49 houses) and Frome Valley Road (140) houses planning applications have been approved, then the Purbeck proposal of 555 houses plus the West Dorset houses will total 1244 houses, an increase of 113% on the current total of approximately 1100 houses. This not mentioned in SD94 or the Submission Local Plan or SHLAA but should have been.

17. The West Dorset Preferred Options document was published in August 2018 ??, 4 months before SD94. The document contains 2 preferred options for Crossways, totally 425 houses. Thus the total housing planned and approved for Moreton-Crossways is 2913 houses representing a 265% increase in Crossways housing stock from 1100 houses. This was not in SD94 but should have been.

Document	Year	Month	Page	Houses	Statement in document	% increase on Moreton Station 85 dwellings	Other allocations and average % increase in Purbeck District excluding Moreton Station (Submission Local Plan)																					
1. SHLAA	2015	January	75	200-900 total on 3 sites	The developer is promoting this site (referred to as Moreton Pit on page 16) along with two other adjacent sites for 200 - 900 dwellings		<table border="1"> <thead> <tr> <th>Houses</th> <th>Allocation</th> <th>% increase</th> </tr> </thead> <tbody> <tr> <td>Bere Regis</td> <td>841</td> <td>105</td> </tr> <tr> <td>Wool</td> <td>2159</td> <td>535</td> </tr> <tr> <td>Wareham</td> <td>2728</td> <td>300</td> </tr> <tr> <td>Lytchet Matravers</td> <td>1494</td> <td>150</td> </tr> <tr> <td>Upton</td> <td>3424</td> <td>90</td> </tr> <tr> <td>Total</td> <td>10646</td> <td>1180</td> </tr> </tbody> </table>	Houses	Allocation	% increase	Bere Regis	841	105	Wool	2159	535	Wareham	2728	300	Lytchet Matravers	1494	150	Upton	3424	90	Total	10646	1180
Houses	Allocation	% increase																										
Bere Regis	841	105																										
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Lytchet Matravers	1494	150																										
Upton	3424	90																										
Total	10646	1180																										
2. Purbeck Local Plan Partial Review Issues and Options Consultation	2015	January	29	200-900 total on 3 sites	Developers consider that land at Redbridge Pit (map states:Moreton Pit) and land to the north of Moreton Station could potentially accommodate between 200 and 900 new homes, plus employment, open space, SANG and community facilities.	235% - 1059%	<table border="1"> <thead> <tr> <th>Houses</th> <th>Allocation</th> <th>% increase</th> </tr> </thead> <tbody> <tr> <td>Moret St/RB Pit</td> <td>83</td> <td>555</td> </tr> </tbody> </table>	Houses	Allocation	% increase	Moret St/RB Pit	83	555															
Houses	Allocation	% increase																										
Moret St/RB Pit	83	555																										
3. Moreton Parish Council Household Petition	2015	July		Petition seeks an increase of 10% = 17 houses	78% of Moreton Parish households (approx 170 households) endorse the Petition All petition forms formally submitted to Purbeck District Council proposal. Proposed allocation subsequently increased to 13% (= 22 houses) to take account of changes in allocation numbers in the draft Local Plan. Note from the table to the right, the average % increase in the due to the allocations in the Purbeck Local Plan Submission is 11.1%	10%/13%	<table border="1"> <thead> <tr> <th>Houses</th> <th>Allocation</th> <th>% increase</th> </tr> </thead> <tbody> <tr> <td>Moret St/RB Pit</td> <td>1100</td> <td>555</td> </tr> <tr> <td>Purb sm site-Maple Lodge</td> <td>15</td> <td>15</td> </tr> <tr> <td>Summer Farm(500)+</td> <td>1100</td> <td>500</td> </tr> <tr> <td>W of Oaklands (49)+</td> <td>1100</td> <td>49</td> </tr> <tr> <td>Frome Valley Rd</td> <td>1100</td> <td>140</td> </tr> <tr> <td>Total</td> <td>1100</td> <td>1259</td> </tr> </tbody> </table>	Houses	Allocation	% increase	Moret St/RB Pit	1100	555	Purb sm site-Maple Lodge	15	15	Summer Farm(500)+	1100	500	W of Oaklands (49)+	1100	49	Frome Valley Rd	1100	140	Total	1100	1259
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W of Oaklands (49)+	1100	49																										
Frome Valley Rd	1100	140																										
Total	1100	1259																										
4. Purbeck Local Plan Partial Review Options Consultation	2016	June	31	350 Just one site	The Council's preferred option is for around 350 homes in this location. Investigation have shown that the site could have the capacity for around 600 homes but the Council's preferred option is for 350 homes in order to give a better balance to south west Purbeck	411%	<table border="1"> <thead> <tr> <th>Houses</th> <th>Allocation</th> <th>% increase</th> </tr> </thead> <tbody> <tr> <td>West Dorset</td> <td>1100</td> <td>1259</td> </tr> <tr> <td>Preferred Options</td> <td></td> <td></td> </tr> <tr> <td>Woodsford Field</td> <td>1100</td> <td>275</td> </tr> <tr> <td>West of Crossways</td> <td>1100</td> <td>150</td> </tr> <tr> <td>Overall Total</td> <td>1100</td> <td>1684</td> </tr> </tbody> </table>	Houses	Allocation	% increase	West Dorset	1100	1259	Preferred Options			Woodsford Field	1100	275	West of Crossways	1100	150	Overall Total	1100	1684			
Houses	Allocation	% increase																										
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Preferred Options																												
Woodsford Field	1100	275																										
West of Crossways	1100	150																										
Overall Total	1100	1684																										
5. New Homes for Purbeck Have your say	2018	January	9	440	Option A is chosen. This is the main site SHLAA/0049 and SHLAA/0048 % chosen in Consultation - Reference Housing Background Paper, January 2019, page 17 paragraph 69 Option A 42% Option B 26% Option C 25%	51.7%	<table border="1"> <thead> <tr> <th>Houses</th> <th>Allocation</th> <th>% increase</th> </tr> </thead> <tbody> <tr> <td>Housing total excluding Redbridge Pit</td> <td>1129</td> <td>1129</td> </tr> </tbody> </table>	Houses	Allocation	% increase	Housing total excluding Redbridge Pit	1129	1129															
Houses	Allocation	% increase																										
Housing total excluding Redbridge Pit	1129	1129																										
6. Purbeck Local Plan Pre-Submission	2018	October	55	490 + a 65 bed care home	The Moreton Station/Redbridge Pit allocation is the only allocation to have been changed from that selected in the January 2018 New Homes for Purbeck Option A. All other housing allocations are as stated in the January 2018 Option A	576% plus a 65 bed care home																						
7. SHLAA	2018	October	58	600the site could be used effectively to deliver around 600 homes with the adjoining SHLAA site (SHLAA/0048)																							
8. Purbeck Local Plan Examination	2019	August	verbal statement	490 + 65 separate care facilities = total 555 buildings	Announced in the 2nd week of the Examination SD95 was released after the 2nd week of the Examination and contains more details	653%																						



SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

C. Summary of Comments on SD94

1. SD 94 is a very poor document. It has:
 - a. Errors.
 - b. Does not report correctly all the allocations to Moreton Station/Redbridge Pit in past consultations.
 - c. Contradicts one of its references: the Housing Background Paper.
 - d. Indicates that the only reason for increasing Redbridge Pit's Option A housing of 440 houses (which received 42% support – Housing Background Paper, page 17, paragraph 69) to 490 houses was that the developers asked for it to be increased.
 - e. Indicates that the staff consider it an achievement that the summation of 490 homes plus the 65 bed care facilities raises the total number to 555 houses, close to the 600 houses which received the lowest support (25%) in the New Homes For Purbeck consultation.
 - f. Virtually ignores Crossways despite the fact that Redbridge Pit is firmly in Crossways, as indicated in SHLAAs 0048, 0049, and 0050 and that 689 houses have been approved by West Dorset Council for Crossways and a further 425 were nominated as Preferred Options by West Dorset Council.
 - g. Firmly ignores the fact that Redbridge Pit will be in the Western Housing Market Area and therefore will support Dorchester and Weymouth and not Purbeck.
 - h.. Does not mention the Purbeck Parish Council housing petition which rejected the initial option of 900 houses and instead proposed an increase of 10% raised to 13% which is the average of all the non-Redbridge Pit nominated housing increases in the Local Plan Submission Draft.
2. Indicates that the number of houses was increased from 440 houses to 490 houses simply because the developers asked for it to be increased. An amazing way to conduct planning.
3. The Local Plan Submission Draft Moreton Station/Redbridge Pit allocation was also increased by the addition of a 65 bed care home. There is no explanation why this requirement was not stated at an earlier stage in the 7 year evolution of the Local Plan.

4. There appears to be no more justification for locating a 65 bed care home on Redbridge Pit, as distinct from any other location than that there was land available, and not that there is a need on the very edge of Purbeck district.
5. During the second week of the Examination of the Local Plan, the Council announced that in place of the 65 bed care home there would be 65 care facilities, thought the Clinical Commissioning Group representatives could not provide any more reassurance on the role of the care facilities than 'Trust Us' we are doing our best.
6. SD94 refers to the care facilities as *...a form of C3 ...* (paragraph 4)..The Housing Background Paper refers to the facilities at Redbridge Pit as being C2 (page 32, paragraph 121).
7. On Friday 9 August I asked a question whether the proposed 65 care facilities on Redbridge Pit would include persons suffering from dementia and related this to Policy E8: Dorset Heathlands (page 44) and the possibility of reducing the number of care facilities on Redbridge Pit by building on heathland as allowed under Policy E8.
8. I was informed that dementia sufferers would not be accommodated in C3 facilities. The Housing Background Paper on page 32 in paragraph 121 states that dementia sufferers could be accommodated in C2 facilities on Redbridge Pit.
9. Thus after 7 years of a 5 year programme, 3 Local Plan consultations with associated drop-in events, 2 SHLAAs, the assistance of the Planning Advisory Service (PAS) in January 2017, workshops, and many specially researched documents totalling hundreds of pages, the Purbeck staff have produced an SD94 and advice at the Examination which conflict with their own Housing Background Paper.
10. Whilst they have covered health issues in the east of the district with Policy I6 and paragraphs 258 to 265 on pages 106 and 107, they could only offer a short late evening Clinical Commissioning Group talk on health coverage in the west of the Purbeck.
11. SD94 paragraph 4 adds the New Homes For Purbeck Option A 440 homes to the 50 extra homes asked for by the developers and the 65 separate C2 or C3 use facilities and reaches 555 dwellings.
12. Purbeck staff state in SD94, paragraph 4, with an clear sense of achievement, that:

....this would take the total capacity of the site to 555 dwellings and therefore very close to the original capacity assessment of 600 homes.
13. The staff have rejected their own statement in the Housing Background Papers on page 17 in paragraph 69 that the New Homes for Purbeck consultation had given:

.....a clear indication to the Council that the local population favoured a spread of development across the District as far as possible.

And instead raise the allocation to Moreton Station/Redbridge Pit to a value approaching the *Option C 600 homes* which had only received 25% support.

14. A truly perverse achievement.

15. SD 94 compounds this by stating in the last sentence of paragraph 4 that:

The homes make an important contribution toward meeting Purbeck's housing needs and represent an effective use of the land.

16. As I have shown below with the extracts from the SHLAAs for 0048, 0049, and 0050, the proposed Redbridge Pit will have nothing to do with the Moreton Station settlement, except for the 1.9% (2011 Crossways census) who may catch the train to work, which bearing in mind that the Purbeck average is 1.3% (2011 Purbeck Census) is hardly noteworthy. Redbridge Pit will be firmly in the Western Housing Market area and contribute to housing demand from Dorchester and to a lesser extent, Weymouth.

I have shown below that approximately 79% of Purbeck's population lives 10 miles east of the Worgret Bridge and hence the one thing that the Redbridge Pit will not do is:
.... make an important contribution toward meeting Purbeck's housing needs and represent an effective use of the land.

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

C. SD94 – comment on each paragraph

1. Paragraph 2. - Three SHLAA sites submitted and capacity

1. *Moreton Station/Redbridge Pit was submitted as two separate Strategic housing land availability sites (SHLAA) sites. The reference in SD94 is the 2019 SHLAA.*
2. This is not true.
3. As I have shown in my table below, the January 2015 SHLAA and January 2015 Partial Review Issues and Options Consultation state that the site (correctly referred to as Moreton Pit in the SHLAA) was submitted *with two other adjacent sites for 200- 900 dwellings.*

2. SD94 Paragraph 2. - Capacity

4. It is extremely disingenuous to quote Redbridge Pit having a capacity of 1071 dwellings when the requirement for a SANGS to mitigate the nearby heathland means that the site must have a far lower capacity.
5. *The capacity was based upon applying 30 dwellings per hectare which is the approximate density of nearby Crossways.* This is an extremely doubtful and unsubstantiated statement. The 2015 SHLAA assessed every site submitted at 30 dwellings per hectare.
6. The dwellings per hectare of dwellings in Crossways varies significantly reflecting the period in which developments were started. Hence if the council believe that the average is 30 dwellings per hectare they should produce statistics to substantiate this statement.
7. The January 2015 SHLAA and January 2015 Purbeck Local Partial Review both stated that site SHLAA/0049 was submitted *with two other adjacent sites for 200- 900 dwellings.*
8. Not 1071 houses.

3. Moreton Parish Council – Housing Petition

9. SD 94 makes no mention of a petition conducted by Moreton Parish Council of all households in Moreton against the 900 dwelling proposal and recommending instead that Moreton should only be allocated the average percentage of the allocations to the other settlements in Purbeck – 10%
10. This was raised subsequently to 13 % to take account of a change in the Purbeck Local Plan Partial Review allocations.

11. All the petition forms were formally submitted to Purbeck District Council.
12. 78% of Moreton Households supported the Parish Council motion.
13. This was an extremely good result considering that a significant number of houses in Moreton are owned by the landlord who is promoting the Moreton Pit site.
14. The petition is not mentioned in SD94 or in the Housing Background Paper.
15. But it highlights the very large gulf between the absolute and relative size of the Purbeck Local Plan Submission Draft housing allocations and the allocations to all other settlements in Purbeck.
16. As my chart below shows the Purbeck Local Plan Submission Draft to Redbridge Pit/Moreton station at 5. represents a 653% increase in the size of Moreton Station.
17. The table at the top right of the Evolution page shows that the percentage increase for the other locations in the Purbeck Local Plan Submission Draft vary from 3% for Upton up to 22% for Wool.
18. The allocation to Redbridge Pit/Moreton Station is far in excess of any other allocations.
19. This is absolutely wrong, especially as 79% of Purbeck's population lives over 10 miles away to the east of the Worgret Bridge (DCC 2013 Estimates of Purbeck - dwellings – dorsetforyou.co.uk/331591))

4. SD 94 - Paragraph 3. The Council's Preferred Option – 2016 – 350 homes

20. Paragraph 3 opens by stating that: *When assessing the capacity of the site in more detail and factoring in 18ha for a SANG on the SNCI as well as open space, the Council believes the true capacity of the site to be more like 600 homes.*
21. This is an assessment that has never been included in the public consultations.
22. *The Issues and Options consultation 2015 proposed up to 900 homes.* As I have shown in my table at 1. it was the developer, not the council that proposed up to 900 homes:

Developers consider that land at Redbridge Pit (map states site is Moreton Pit) and land to the north of Moreton Station could potentially accommodated between 200 and 900 new homes, plus employment, open space, SANG and community facilities.

23. Furthermore the developer was referring to the capacity of the 3 Moreton Station sites not just Redbridge Pit when referring to 200 to 900 new homes.

24. *The Options consultation 2016 proposed up to 600 homes at Moreton Station / Redbridge Pit.*
This is not true.

25. The Options Consultation 2016 stated, as I have shown in my table at 4. that :

The Council's preferred option is for around 350 homes in this location

26. Indeed the document specifically discounted the 600 home option as I have shown in my table at 4.:

Investigation have shown that the site could have the capacity for around 600 homes but the Council's preferred option is for 350 homes in order to give a better balance to south west Purbeck.

5. SD94 - Paragraph 3. New Homes for Purbeck – a strong majority favouring Option A

27. *The New Homes for Purbeck consultation 2018 proposed options from 440 to 600 homes at Moreton Station / Redbridge Pit.* This again is extremely disingenuous.

28. As I have shown in my table at 5. the three options referred to Redbridge Pit SHLAA/0049 and the Caravan site SHLAA/0048 and not just Redbridge Pit as the title of SD94 makes clear.

29. This is important because during the Mineral Sites Examination in October 2018 (9 months after the New Homes consultation) it was state by DCC that the owner of the caravan site was no longer proposing moving the caravan park.

30. The reference in paragraph 3 to Option A: 440 homes and Option C 600 home is again very disingenuous.

31. Option C only had 2 allocations: *800 homes at Wool and 600 homes at Redbridge Pit/Moreton Station*

32. Option C was firmly rejected by the overwhelming majority of households who submitted their Council supplied response forms.

33. The Housing Background Paper, dated January 2019, states on page 17 in paragraph 69 that:

6,762 responses were received throughout the consultation, representing almost 30% of households. The results showed a strong majority favouring Option A (42%), with Option B and C receiving similar amount of support (26% and 25% respectively). This gave a clear indication to the Council that the local population favoured a spread of development across the District as far as possible.

34. Thus to resurrect Option C, 600 homes, in paragraph 3 as though it was practical proposition and as justification for increasing the housing allocation from 440 to 490 is ridiculous.

35. This is also emphasised by the fact that of the allocations in Option A, chosen by the people of Purbeck:

- 470 homes at Wool
- 440 homes at Redbridge P/Moreton Station
- 90 homes at Upton
- 150 homes at Lytchett Matravers
- 250 homes on smaller sites across the district

Only the housing for Redbridge Pit/Moreton Station has been changed.
It has been increased from 440 to 490 dwellings and increase of 50 homes.

6. SD94 - Paragraph 4. 440 to 490 homes

36. The paragraph opens with the statement:

After discussions with the developer regarding potential as well as taking into account constraints of the site, the Council settled on a proposal of 490 homes at this site as explained in the housing background paper⁵

37. The reference at 5 refers to the Housing Background Paper, dated January 2019. This states on pages 17/18 in paragraph 72 that:

*Since the consultation 50 homes were added to the capacity of the proposed site at Redbridge Pit/Moreton Station on further exploration of potential and **liaison with the developer.***

38. The Housing Background Paper states on pages 20/21 in paragraph 84 that:

*As discussed in some detail, there is development opportunity at this location, which is outside the green belt. The combined sites could accommodate in excess of 600 homes (as presented in Option C of the 2018 'New Homes for Purbeck' consultation); however, this was not supported by the majority of respondents. **As a result of further consultation with the site promoter and consultees,** it was agreed that the site would be suitable for 490 homes, representing the largest of the allocated sites in the Plan.*

39. All three quotes effectively say the same thing:

After discussions with the developer...- SD94, paragraph 4 first sentence.

.....liaison with the developer. – Housing Background Paper, paragraph 72.

As a result of further consultation with the site promoter and consultees, - Housing Background Paper paragraph 84

40. The increase of 50 houses was, therefore, simply a suggestion by the developer.

7. SD94 - Paragraph 4 – addition of 50 homes to Option A – justification

41. There is no discussion as to whether the Redbridge Pit/Moreton Station is the best site to increase by 50 dwellings; the comparative merits of spreading the increase to other allocations or sites; the impact on Crossways and its already approved 500 house Summer Farm development and the two other approved plans for Land adjacent to Oaklands Park and Frome Valley Road totalling 189 houses. No consideration of whether in a masterplanning context this is right for Crossways. No discussion of its impact on the utilities, services and road transport of Crossways. No discussion of whether the 20 affordable houses component of the 50 houses would be better located in a settlement that had no housing allocation such as Swanage. No discussion of the SANGS required.

42. The Housing Background Paper stated on page 17 in paragraph 69 that the 6,762 responses, representing almost 30% of the households of Purbeck in the *New Homes for Purbeck* Consultation in January 2018 (5. in my table below) gave:

.... a clear indication to the Council that the local population favoured a spread of development across the District as far as possible.

43. There is no discussion as to whether putting the 50 homes in the largest allocation in the Local Plan was counter to the *clear indication* that *the local population favoured a spread of development*.

44. The proposed addition demonstrably fails to satisfy the clear indication given by the local population. The 6,762 responders have been deceived by placing 50 houses including 20 affordable houses in the already largest housing allocation rather than spreading the development in accordance with Option A.

45. The Housing Background Paper clearly reflects a conversation between the Moreton Estate and the Council in which the Moreton Estate asked for more houses to be added to its allocation and this was duly actioned (reference: Council Member).

8. SD94 - Paragraph 4 – addition of 50 homes to Option A – consultees

46. The Housing Background Paper states in paragraph 84 states that: *As a result of further consultation with the site promoter **and consultees,...***

47. There was no consultation with Moreton Parish Council or the inhabitants of Crossways who will have to live with the increased housing without an compensating increase in services, facilities and road management.

9. SD94 - Paragraph 4 – addition of 50 homes to Option A – In excess of 600 homes

48. The Housing Background Paper states on pages 20/21 in paragraph 84 that:

*As discussed in some detail, there is development opportunity at this location, which is outside the green belt. The combined sites could accommodate **in excess of 600 homes** (as presented in Option C of the 2018 ‘New Homes for Purbeck’ consultation)*

49. Option C refers to 600 homes.

50. Not **in excess of 600 homes**.

10. SD94 - Paragraph 4 – 65 unit care facilities - ..as a form of C3 use.

51. The care facilities represent a very good example of the Purbeck Local Plan.

52. The 2015 Issues and Options Consultation, January 2015 (SD94 Reference 2) did not mention care homes.

53. The Eastern Dorset 2015 Strategic Housing Market Assessment, dated October 2015 (not referred to by SD94), states on page 158 in paragraph 9.36 that:

There will however need to be a recognition that there may be some additional need for particular groups such as those requiring specialist nursing or for people with dementia.

54. On page 198 in paragraph 10.49 the SHMA makes the distinction between C2 and C3 housing:

The OAN conclusions are for C3 dwellings. This does not include provision for C2 accommodation for older persons nor other institutional uses which fall under the institutional rather than residential population.

55. And on page 203 in paragraph 10.81 under the title *Need for Registered Care Provision*, the SHMA also states that:

Registered care provision fall within a C2 use class; with households who live in care homes counted as part of the institutional rather than the household population. As such provision of residential care provision is treated in the analysis of housing need separately in this report from that for C3 dwellings.

56. The SHMA shows on page 2014 in Table 86 that the total need for care home provision in Purbeck is 131 :

Table 86: Need for Residential Care Housing

Need – Nursing and Residential Care Bedspaces, 2013-33	
Bournemouth	853
Christchurch	201
East Dorset	460
North Dorset	339
Poole	769
Purbeck	131
HMA	2,754

57. The Options Consultation, June 2016 (SD94 Reference 3) states on page 80 in paragraph 171 that:

Institutional (use class C2) housing

171 *This provides an element of residential care and includes extra care housing and residential care homes. The SHMA concludes that the Council needs to deliver 131 units of C2 accommodation over the 2013-2033 period. This represents seven units per annum. However, the Council has already provided a net total of 85 C2 units since 2013. The Council's housing background paper shows that the remaining 46 units would be best delivered on one site.*

58. The Options Consultation then stated on page 82 two alternatives for a care home:

Care home provision

Preferred Option 9 - Care Homes

In order to meet C2 housing (care home) needs, the Council will identify a site for a 50-bed care home. The Council's housing background paper has assessed potentially suitable sites and proposes the options below. The choice of sites identified is between Bovington Middle School, Camp Farm at Sandford and Keyworth Drive at Sandford.

Site 19 - Bovington Middle School

This is a 7.1ha site, of which 1.3ha are brownfield. It is publicly owned and is on the edge of a large settlement. It is located within 400m of a heath, but C2 development is permissible within this zone. There is no current C2 provision in the area. This site is large enough to accommodate a care home with 50 or more bed spaces.

59. The next public consultation was the New Homes for Purbeck consultation which started in January 2018 (SD94 Reference 4). It did not mention care homes

60. The Purbeck Local Plan Pre-Submission Draft (2018-2034), no date but issued in October 2018 followed the New Homes consultation (not referred to by SD94). This stated on page 21 on Policy V1 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.

61. Policy H4: Moreton Station /Redbridge Pit on page 55 merely refers to a 65 bed care home,

62. There is no explanation or reference to why the Options Consultation June 2016 sites at Sandford and Bovington have been dropped or why the requirement for one 50 bed care home had now become two 65 bed care homes.

63. There is also no reason given, or reference to another document, as to why the statement, quoted above, from paragraph 171 of the Options Consultation June 2016 that.... *46 units would be best delivered on one site* had become 130 places on two sites not previously mentioned.

64. The Purbeck Local Plan Submission January 2019 SHLAA (SD94 Reference 1) only refers to a 65 bed care home in Upton in SHLAA/0098, starting on page 24.

65. Regrettably, as is to be expected, there is no mention of a care home in the SHLAA/0049 Moreton Station/Redbridge Pit (page 54) section.

66. Unfortunately, but typically, the SHLAA continues the Purbeck tradition of providing no list of the sites contained in the 250 page document.

67. SD94 paragraph 4 states:

This is in addition to 65 unit care facilities. Should this be delivered as a form of C3 use,....

68. The Housing Background Paper (SD 94 Reference 5)states on page 32 in paragraph 121 that:

*121. Provision of care homes as part of the allocated sites at Wool and Moreton are considered the most sustainable locations that can incorporate the need for **C2** accommodation. The Council are keen to work with care providers and developers in order to determine how needs can be best met within this use class, accounting for identified health problems, such as **dementia**, and an ageing population.*

69. SD94 paragraph 4 states C3 and Housing Background paper states that the care homes will be C2

70. Which is it?

11. SD94 - Paragraph 4 – 65 unit care facilities - ..dementia

71. I was explicitly told on 9 August at the examination that the care home(s) would not accommodate people suffering with dementia.

72. But the Housing Background Paper in referring to the C2 accommodation in the Redbridge Pit/Moreton Station allocation clearly states that :

*...how needs can be best met within this use class, accounting for identified health problems, such as **dementia**, and an ageing population.*

73. So the council staff stated that the Purbeck Local Plan Examination clearly stated that the Redbridge Pit/Moreton Station care home facilities would be for people suffering with dementia, whilst the Housing Background Paper states that they will accommodate dementia sufferers.

74. Clarification is needed.

12. SD94 - Paragraph 4 – 65 unit care facilities and New Homes for Purbeck consultation

75. The New Homes for Purbeck consultation Option A does not mention care home facilities for Redbridge Pit/Moreton Station, though there is ample room for the consultation to have added this detail.

76. Option A stated 440 homes for Redbridge Pit/Moreton Station whereas SD94 refers to 440 homes, an additional 50 homes wanted by the Moreton estate and 65 separate care facilities

77. Thus the 6,762 responders (*almost 30% of households*) Housing Background Paper page 17 paragraph 69) to the consultation were unaware when submitting their consultation forms that they were responding based upon significantly incomplete information.

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

D. SD94 – other documents

1. SD95: Care home provision modification to improve clarity (no date)

1. Although SD94 paragraph 4 explicitly refers to *...65 unit care facilities* it does not refer to SD95: Care home provision modification to improve clarity.
2. SD94 paragraph 4 states: *Should this be delivered as a form of C3 use, this would take the total capacity of the site to 555 dwellings...*
3. SD95 states on page 1 in paragraph 3 that:

It is now considered that extra care housing will be the best way to deliver this need (either as C2 or C3 depending on consultation with health and care providers).

4. So SD94 says C3, The Housing Background Paper says C2 and SD95 says it could be C2 or C3.
5. As the above SHMA quotes above show, OAN housing is considered as C3 and specialist care facilities are considered as C2.
6. SD95 proposes on pages 2 and 3 that the Purbeck Local Plan Submission Draft Policy H4 wording should be changed as follows (not in italics for ease of reading 3 colours, strikethrough and underlining):

....a 65 ~~bed~~ unit care facility, care home community facilities and supporting infrastructure. The type of care home provided will be ~~dependant on the changing needs of older people in Purbeck~~ and in consultation with local health and social care providers.

7. Thus SD94 Paragraph 4's 65 unit care facilities will, according to becomes 65 unit care facility in the proposed change to the Local Plan Submission Draft.
8. Furthermore the type of care home (note singular) is not disclosed and there is no indication when it will be disclosed.
9. In the second week of the Examination in August attendees were told by the Purbeck Staff that the 65 bed care home would be 65 separate units and SD94 states that

...this would take the capacity of the site to 555 dwellings...

10. SD95 in its proposed wording for Policy H4 inserts **care facility** and deletes **care-home** and in the next sentence refers: *The type of **care home** provided...* having just proposed deleting the term care home in preference for care facility.

11. SD95 page 3 Glossary states:

Care facilities and specialist purpose built accommodation

This will be self-contained dwellings or bed spaces suitable for the elderly, disabled or those with dementia by providing either registered personal care available on site 24/7, or a warden is available on site on a regular basis but where no personal care is provided.

12. This refers to Care facilities, plural, whereas Moreton is proposed to have a care facility , singular. It is also unclear whether the bed spaces are in one building or separate buildings.

2. Main Modifications and Care Home(s)

MM1 – Part 2 – page 12

13. This proposed amendment states:

Purbeck's ageing population will be catered for by the provision of care facilities ~~two 65-bed care homes – one at Wool and One at Moreton.~~ at Wool and Moreton Station / Redbridge Pit, as well as specialist purpose built accommodation at Wool, Moreton Station/Redbridge Pit, Lytchett Matravers and Upton.

14. SD95 refers to a 65 ~~bed~~ **unit care facility** and not **facilities**.

3. Care home/Care facility(ies) – the SHMA, SD94, SD95 and the Housing Background Paper.

15. The C2 requirement and number of bed spaces were stated in the October 2015 SHMA, as shown in the extracts above.

16. Subsequently there has been an Options Consultation June 2016, the New Homes for Purbeck consultation in January 2018, the Pre-Submission Consultation, the Local Plan Submission, two weeks of examination and the publication on the internet of a series of documents.

17. At the end of almost 4 years, Purbeck have published documents that conflict with each other and with what was said by the Purbeck staff during the second week of the examination.

18. Despite the SHMA clearly stating the numerical requirement almost 4 years ago, Purbeck staff have still not identified how the SHMA suggested C2 requirement is to be implemented.

19. This is after 7 years of a 5 year programme and is not acceptable.
20. It is inexcusable that after 5 years of a 5 year programme, with 2 earlier consultations and associated public events, a SHLAA, a SHMA, help from the Planning Advisory Service and workshops, that Purbeck should consult on incomplete information.

4. SD94 - paragraph 4 – 600 homes

21. SD 94 paragraph 4 states:

This is in addition to 65 unit care facilities. Should this be delivered as a form of C3 use, this would take the total capacity of the site to 555 dwellings and therefore very close to the original capacity assessment of 600 homes.

22. The Housing Background Paper on page 17 in paragraph 69 states:

The results showed a strong majority favouring Option A (42%), with Option B and C receiving similar amount of support (26% and 25% respectively). This gave a clear indication to the Council that the local population favoured a spread of development across the District as far as possible.

23. Purbeck Council expended considerable money on a private contractor, printing and postage to organise and report on the New Homes for Purbeck.
24. Option A clearly showed that Redbridge Pit/Moreton Station should receive 440 houses, Wool 470 houses, Upton 90 houses, and Lytchett Matravers 150 houses.
25. The Submission Local Plan has made no change to the allocations to Lytchett Matravers and Upton, or the 105 houses to Bere Regis in its Neighbourhood Plan or the 300 houses to Wareham in its Neighbourhood Plan which has still not been completed.
26. But alone, Redbridge Pit/Moreton Station has had its 440 allocation increased by 50 houses, simply because the landowner wanted more houses. SD94 and the Housing Background Paper provide no more justification than that the council had **discussions with the developer** (SD94, paragraph 4 first sentence), and **liaison with the developer** (Housing Background Paper, paragraph 72), and **As a result of further consultation with the site promoter and consultees**, (Housing Background Paper paragraph 84) Purbeck Council increased the Redbridge Pit/Moreton Station by 50 homes.
27. It had nothing to do with the rejected 600 house Option C which only achieved 25% in the New Homes for Purbeck Consultation but SD94 uses it as justification
28. To compound this situation a *65 bed care home* (Purbeck Local Plan, Pre-Submission Draft – no date but issued in about October 2018, page 55), singular, was added to the Redbridge Pit/Moreton Station housing total of 490 houses.

29. During the second week of the Examination (6-9 August 2019) Purbeck staff announced that the 65 bed care home would be 65 separate units, thereby raising the Redbridge Pit/Moreton Station allocation total to *555 dwellings and therefore very close to the original capacity assessment of 600 homes* (SD94, paragraph 4).
30. The Purbeck Staff have written the above statement as an accomplishment in overturning the result of the New Homes for Purbeck *Option A* total of *440 houses* and the *42% vote* submitted by almost *30% of households* during the consultation (SD 19 Housing Background Paper, page 17, paragraphs 68 and 69, January 2019).

5. Housing Background Paper – SHLAA/0050

31. SHLAA/0050 is a site just north of Moreton Station settlement.
32. The Housing Background Paper states on page 20 in paragraph 84 that:

*Land to the north of Moreton Station was considered less favourable due to the lack of available sewage and water capacity and the issues arising from upgrading services and utilities under the **railway bridge**. To allocate both of these sites would also create imbalance in the spread of development across the District.*

33. There is no railway bridge at Moreton Station.
34. This casts doubt on the accuracy of the Housing Background Paper.

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

SD94 - REDBRIDGE PIT AND CROSSWAYS

SD22 SHLAA dated January 2019

1. SHLAA/0050 – Land to the north of Moreton Station

1. SHLAA/0050 states on page 53 in the 3rd paragraph that:

Moretonis indicated in the hierarchy as less sustainable than other areas in Purbeck. However, the sites proximity to Crossways, an equivalent of a key service village, and the proposals for development proposed in this area support the development of this site and will support the sustainability and strength of this whole area.

2. This shows that the 3 SHLAA sites at Moreton Station are in themselves unsustainable and only made sustainable by their immediate presence to Crossways.
3. Note this site has nothing to do with Moreton Station settlement except for 1.9% using the train to travel to work (Crossways 2011 Census).

2. SHLAA/0049 Redbridge Pit

4. SHLAA/0049 states on page 55 in the Assessment section, in the 2nd paragraph that:

Basic amenities are within walking distance of the site; village shops, pub, post office and community hall. Also the site is adjacent to the main railline. Services for new homes could connect to neighbouring utilities.

5. This shows how well integrated into Crossways that the houses on Redbridge Pit would be.
6. Note there is no mention of Moreton Station with which Redbridge Pit has no connection, other than for about 1.9% of the population (Crossways 2011 Census) use to travel to work.
7. On page 56 the Relevant planning policies / background evidence section, in the 4th paragraph states:

A planning application is being considered by Dorset Council Partnerships for 500 new homes and 2.5 hectares of employment land on land to the South of Warmwell Road, Crossways. Dorset Council Partnerships is also considering allocating land for a further 614 homes in their emerging local plan.

8. This section does not make any reference to the Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options Consultation, August 2018 (note 4 months before publication of the Purbeck January 2019 SHLAA).

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

F. SD94 - Crossways

1. Expansion of Crossway, Purbeck and Swanage

1. The table below shows the expansion of Crossways, Purbeck and Swanage.

Population growth in Crossways, Purbeck and Swanage

Crossways			Purbeck			Swanage		
Year	Population	% change	Year	Population	% change	Year	Population	% change
1971	Didn't exist		1971	36690		1991	9520	
1981	1306		1981	40709	11.0%	2001	10140	6.5%
1991	1733	31.7%	1991	42700	4.9%	2011	9590	-5.4%
2001	2019	16.5%	2001	44420	4.0%			
2011	2267	12.3%	2011	44973	1.2%	2013	9570	-0.2%
2016	2429	7.1%	2017	46756	4.0%			
Growth			Growth			Growth		
1991 - 2016	696	40.2%	1991 - 2017	4056	9.5%	1991 - 2013	50	0.5%

Data sources

1. Swanage - Swanage Local Plan, June 2017 - Page 11, Table 1
2. Purbeck - 1971, 1981, 1991, 2001 = DCC - Dorset Data Book 2005 - page 9 Census Figures 1971 to 2001
 - 2011 = Google: www.ukcensusdata/purbeck = ONS (Q5102EW)
 - 2017 = Google: purbeck population statistics = ONS display on inquiry page
3. Crossways - 1971, 1981, 1991, 2001 = West Dorset District Council, Rural Functionality Study, p65 Figure 54: Change in the population of Crossways and Thorncombe (Census information supplied by Dorset County Council) (no date on report but produced in response in to The Inspector's Report on the Revised Deposit Local Plan (2006). (Executive Summary)
 - 2011 ONS Census data from www.citypopulation.de
 - 2016 projected value from www.citypopulation.de

2. The table shows that the 40% growth in Crossways over the period 1991 to to 2016 far outstrips the growth for Purbeck.
3. The figures for Swanage, taken from page 11 of the Swanage Local Plan, June 2017, essentially indicate that Swanage has not grown at all. Over the period 2001-2011 Swanage actually contracted by - 5.4%.

2. West Dorset Preferred Options Consultation – August 2018

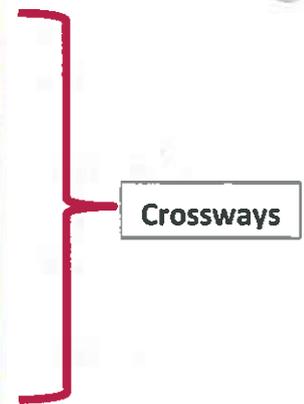
4. The proposed Redbridge Pit development would, as stated in the SHLAA quotes above, be dependent on Crossways.

- Redbridge Pit is effectively in Crossways, is only yards from the Summer Farm development in the extant West Dorset Plan and is closer to the centre of Crossways and Dorchester than some houses in Crossways.
- The table below has been copied from the Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options August 2018. The page shows part of Table 3.3 on page LPR 81.

Local Plan

West Dorset, Weymouth & Portland Local Plan Preferred Options Consultation 2019

LOCATION	HOUSING SUPPLY	APPROXIMATE PHASING				EMPLOYMENT LAND	STRATEGIC ALLOCATION	POLICY REF.
		2016-21	2021-26	2026-31	2031-36			
Littlemoor (West Dorset)								
Littlemoor Urban Extension (part)	450		↑	↑	↑	✓	✓	LIT1
Dorchester								
Weymouth Avenue Brewery Site	185	↑	↑			(retain)	✓	DOR4
Poundbury Phases 3 and 4	1,127	↑	↑			✓	✓	DOR7
Land South of St George's Road	50	↑				(possible)	–	DOR10
Land off Alington Avenue	50	↑				–	–	DOR11
Dorchester Prison (PO)	185	↑	↑			–	✓	DOR12
North Dorchester (PO)	2,340		↑	↑	↑	✓	✓	DOR15
Land to the west of Charminster (PO)	320	↑	↑	↑		–	✓	DOR16
Crossways								
South of Warmwell Road	500	↑	↑	↑		✓	✓	CRS2
Land adjacent to Oaklands Park (PO)	49	↑	↑			✓	–	CRS3
Frome Valley Road (PO) <small>Consent for 25</small>	140	↑	↑			–	✓	CRS4
Woodsford Fields (PO)	275		↑	↑	↑	–	✓	CRS5
West of Crossways (PO)	150			↑	↑	–	✓	CRS6
Bridport								
Vearse Farm	930	↑	↑	↑	↑	✓	✓	BRID2
Land East of Bredy Vet's Centre	40	↑				–	–	BRID3



7. On the copied page the grey shading indicates sites with Planning Permission (as at 1st April 2017).
8. Sites with (PO) attached indicates that they are Preferred Options
9. The document states on page LPR 247 in paragraph 12.5.1 that:

Land to the south of Warmwell Road is allocated for a mixed-use development, including about 500 new homes, a minimum of 2.5 hectares of employment land and local community facilities. Outline planning permission (subject to the completion of a planning agreement) was granted for the site in 2017.

10. The document states on page 249 in paragraph 12.6.1 that:

Land adjacent to Oaklands Park has been granted planning permission for 49 homes, eight commercial units (Use Class B1) and associated landscaping.

11. Paragraph 12.7.1 on page LPR250 states that:

12.7.1 The site west of Frome Valley Road lies close to the existing built form of Crossways and the railway line. It already has outline planning permission for 85 dwellings with associated SANG provision. However, a planning application to increase the number of dwellings on the site to 140 is currently under consideration.

12. Planning approval for 140 house development was granted on 16 August 2018.
13. Thus approval has been granted for 689 houses in Crossways.
14. Tabel 3.3 shows that *Woodsford Fields (PO) 275* and *West of Crossways (PO) 150* are both preferred options and if approved would add a further 425 houses to the Crossways development total.

3. Housing growth in Crossways

15. I have produced the table below to show the percentage increases approved and planned for Crossways. It is shown on my Evolution Table at the end of the Introduction section of this document.
16. I have included the Purbeck Local Plan Submission allocations as a point of comparison.

Other allocations and average % increase in Purbeck District excluding Moreton Station (Submission Local Plan)

	Houses	Allocation	% Increase
Bere Regis	841	105	12%
Wool	2159	535	22%
Wareham	2728	300	11%
Lytchet Matravers	1494	150	10%
Upton	3424	90	3%
Total	10646	1180	11.1%
Moret St/RB Pit	83	555	669%

Crossways			
Moret St/RB Pit	1100	555	50%
Purb sm site-Maple Lodge		15	
Summer Farm(500)+	1100	500	45%
W of Oaklands (49)+	1100	49	4%
Frome Valley Rd	1100	140	13%
Total	1100	1259	114%
West Dorset Preferred Options			
Woodsford Field	1100	275	25%
West of Crossways	1100	150	14%
Overall Total	1100	1684	153%

Housing total excluding Redbridge Pit
 1129 103%

17. The table shows that the combined housing for Redbridge Pit (555), Summer Farm (500), Land west of Oaklands Park (49) and Frome Valley Road (140) totals 1244 houses. This represents an approximately 113% increase in the number of houses in Crossways.
18. If the two preferred options shown on page LPR81 above from the West Dorset Preferred Options (Woodsford Field 275 and West of Crossways 150) are added to the 1244 houses the total would be 1669 houses, a 152% increase in the number of houses in Crossways.
19. By comparison the Purbeck Local Plan Submission allocations and neighbourhood plan proposals, excluding Redbridge Pit only totals 1115 houses, 554 fewer houses than are proposed for Crossways.
20. Whereas the Purbeck allocations of 1115 houses are spread over 5 settlements, the 1244/1669 houses approved and planned for Crossways are all located very close to each other. The 1055 houses of the Summer Farm (500 houses) development and Redbridge Pit (555 houses) are very close.
21. The average growth of the Purbeck proposals is 10.5% with Wool the highest at 22%.
22. By comparison the 555 houses proposed for Redbridge Pit represents a 653% increase on Moreton Station's housing total and a 50% increase on Crossways housing total.

23. But since the proposed Redbridge Pit development (555 houses) will accompany the approved developments on Summer Farm (500 houses), Land west of Oakland's Park (49 houses) and Frome Valley Road developments (140 houses), the actual impact on Crossways, not including the West Dorset Local Plan Preferred Options August 2018, will be 1244 houses, a 113% increase.

4. West Dorset Local Plan – Inspector's Report

24. In his Report on the Examination into the West Dorset, Weymouth and Portland Joint Local Plan, dated 14 August 2015 (the extant West Dorset Local Plan), Mr Paul Crysell stated on page 33 in paragraph 165 that:

Crossways is close to Dorchester but without substantial enhancements to transport links I do not consider it is a particularly sustainable option for meeting the longer term needs of the county town.

25. There have been no enhancements to transport links, let alone *substantial enhancements*.

26. The bus service is used by approximately 2% of Crossways population (DCC transport section statistic).

27. The train is used by 1.9% of Crossways population to travel to work (2011 Census). The Purbeck average is 1.3% and hence Crossways is only 0.6% or approximately 6 people above the Purbeck average.

28. In Wool 4.9% travel by train, in Wareham 2.6% travel by train and in Dorchester 2% travel to work by train. So in both relative and absolute terms more people travel to work by train in Wool, Wareham and Dorchester than do in Crossways (all 2011 Census).

29. In Swanage 1.3% travel to work by train (all 2011 Census). Thus in absolute terms far more people travel to work by train in Swanage than do in Crossways.

30. Mr Crysell also stated on page 31 in paragraph 153 that:

Crossways lies close to the District's eastern boundary with Purbeck District and functions as a dormitory settlement...

31. Neither SD94 nor the Purbeck Local Plan Submission Draft reflect the Inspector's statements.

32. Purbeck Council in SD94 ignores the Inspector's statements.

33. Purbeck Council even reclassified Moreton Station, with just a pub and railway station, as a *Key Service Village* (Purbeck Local Plan Submission January 2019 page 130, Settlement Hierarchy), whereas the West Dorset Local Plan Inspector merely calls Crossways a *dormitory*.

34. A dormitory is a dormitory and by definition cannot be a key service village.

35. SD94's only mention of Crossways is in paragraph 2:

The capacity was based on applying 30 dwellings per hectare which is the approximate density of nearby Crossways.

36. Even this is doubtful. All the sites in the 2015 SHLAA were assessed at a density of 30 dwellings per hectare and the 2015 SHLAA's figures have been carried forward into the Submission SHLAA.

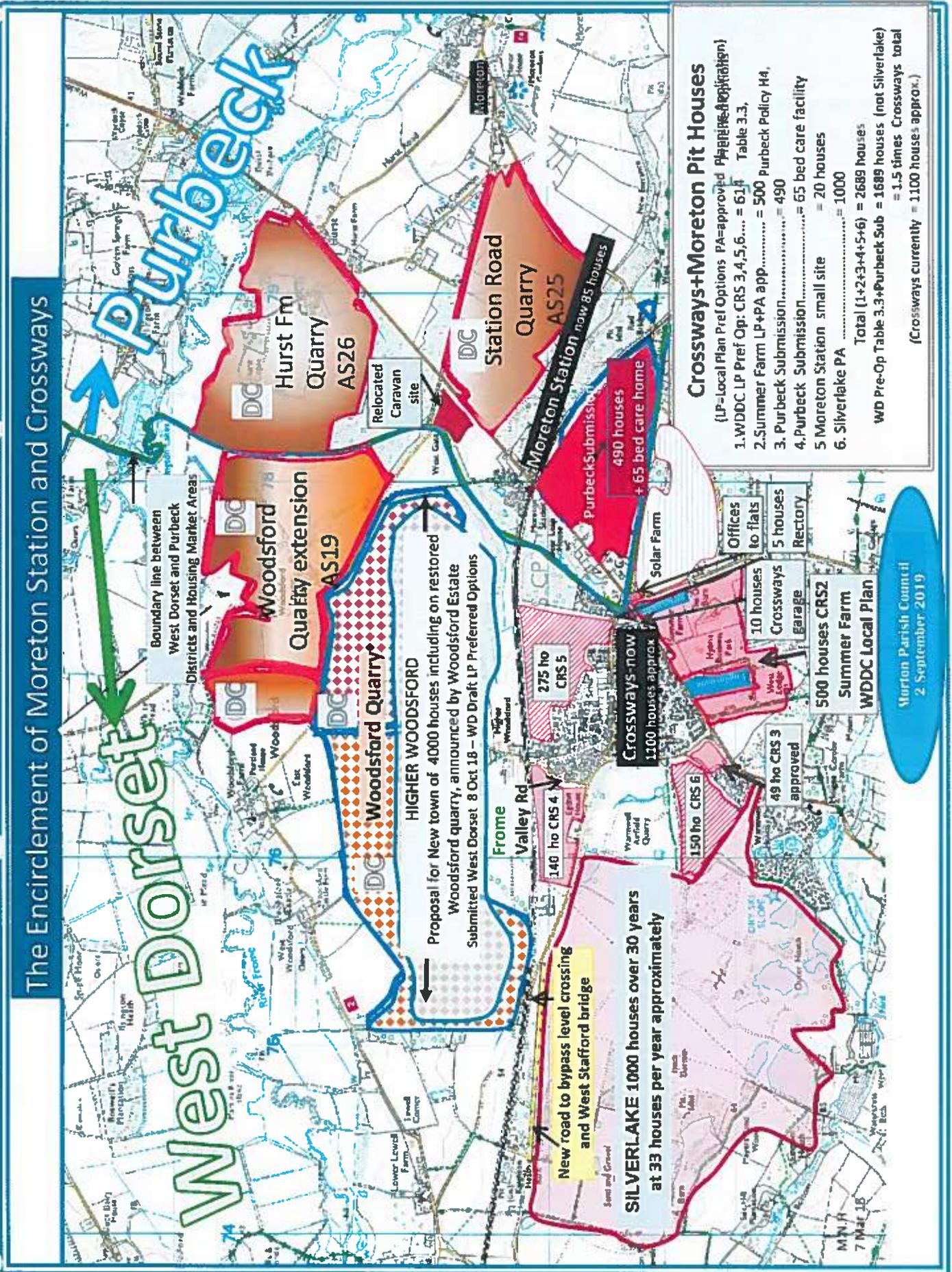
37. Purbeck have provided no data to substantiate their 30 dwelling per hectare density. This is important because Crossways has evolved over the period since its creation in 1984 in groups of housing all at different dwelling densities.

38. Of far more importance is that Purbeck have significantly increased the number of houses allocated to Redbridge Pit without taking any account of the Crossways without any consideration at all of their impact.

5. Encirclement Map

39. I have included my Encirclement Map on the following page to illustrate the tremendous development approved and planned for the very small area of Moreton and Crossways.

40. The quarries AS19, AS25 and AS26 have gained approval in the Mineral Sites Plan Examination Main Modifications published on 13 May 2019.



Crossways+Moreton Pit Houses

(LP=Local Plan Preferred Options PA=approved Planning Application)

1. WDDC LP Pref Op: CRS 3,4,5,6... = 621 Table 3.3,
2. Summer Farm LP+PA app..... = 500 Purbeck Policy H4,
3. Purbeck Submission..... = 490
4. Purbeck Submission..... = 65 bed care facility
5. Moreton Station small site = 20 houses
6. Silverlake PA = 1000

Total (1+2+3+4+5+6) = 2689 houses
 WD Pre-Op Table 3.3+Purbeck Sub = 1689 houses (not Silverlake)
 = 1.5 times Crossways total
 (Crossways currently = 1100 houses approx.)

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

G. SD94 – Summer Farm

1. West Dorset Preferred Options Consultation – August 2018

1. The proposed Redbridge Pit development would, as stated in the SHLAA quotes above, be dependent on Crossways.
2. Redbridge Pit is effectively in Crossways, is only yards from the Summer Farm development in the extant West Dorset Plan.
3. The table below has been copied from the Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options August 2018 (page LPR81, Table 3.3). The location South of Warmwell Road is known as Summer Farm.

Local Plan

West Dorset, Weymouth & Portland Local Plan Preferred Options Consultation 2018

LOCATION	HOUSING SUPPLY	APPROXIMATE PHASING				EMPLOYMENT LAND	STRATEGIC ALLOCATION	POLICY REF.
		2016-11	2021-26	2026-31	2031-36			
Littlemoor (West Dorset)								
Littlemoor Urban Extension (part)	450	✓	✓	✓	✓	✓	✓	LITT1
Dorchester								
Weymouth Avenue Brewery Site	185	✓	✓			(retain)	✓	DOR4
Poundbury Phases 3 and 4	1,127	✓	✓			✓	✓	DOR7
Land South of St George's Road	50	✓				(possible)	✓	DOR10
Land off Alington Avenue	50	✓				✓	✓	DOR11
Dorchester Prison (PO)	185	✓	✓			✓	✓	DOR12
North Dorchester (PO)	2,340	✓	✓	✓	✓	✓	✓	DOR15
Land to the west of Charminster (PO)	320	✓	✓			✓	✓	DOR16
Crossways								
South of Warmwell Road	500	✓	✓	✓	✓	✓	✓	CRS2
Land adjacent to Oldlands Park (PO)	49	✓	✓			✓	✓	CRS3
Frome Valley Road (PO) Consent for BS	140	✓	✓			✓	✓	CRS4
Woodsford Fields (PO)	275	✓	✓	✓	✓	✓	✓	CRS5
West of Crossways (PO)	150	✓	✓			✓	✓	CRS6
Bridport								
Vearse Farm	990	✓	✓	✓	✓	✓	✓	BRID2
Land East of Bredy Vet's Centre	40	✓				✓	✓	BRID3

Summer Farm

Crossways

2. Artist's impression and illustrative masterplan of the proposed development on Summer Farm

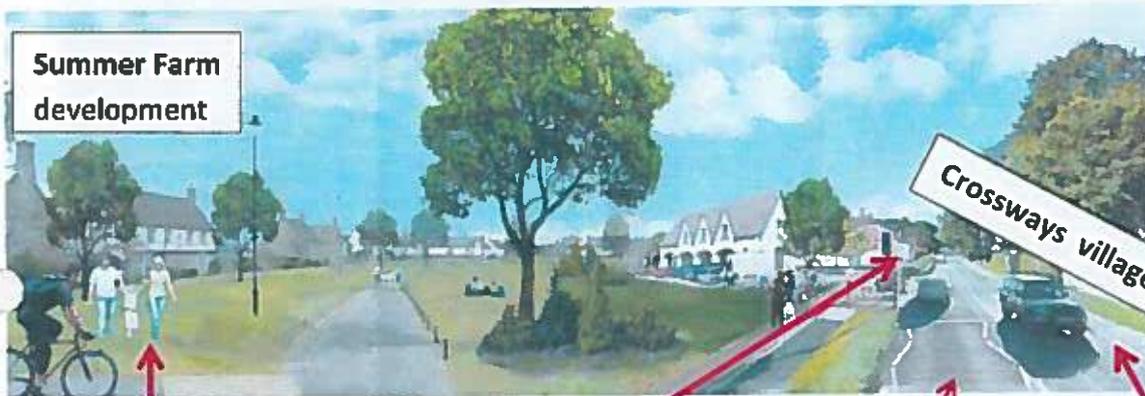
4. The artists impression and Illustrative Masterplan on the following pages were supplied by the first developer of Summer Farm. They are shown here to illustrate that the development is very large and is very close to the proposed 555 houses on Redbridge Pit.

3. SD94 and the proposed development on Summer Farm

5. SD94 does not even mention this large development very close to the proposed development on Redbridge Pit, let alone whether it would be appropriate to locate 2 developments whose total housing (Redbridge Pit 555 houses + Summer Farm 500 houses = 1055 houses) would be almost equal to the current total housing in Crossways (1100 houses).
6. The proposed new location for Crossways Health Centre is shown at **1** on the illustrative masterplan below. The proposed new location for Crossways village hall is at **2**.
7. The SHLAA/0049 Redbridge Pit states that the people in the proposed development on Redbridge Pit will use these facilities together with the new people on the other approved and planned developments around Crossways, approximately 3273 people in total.
8. But SD94 does not mention the facilities let alone give any consideration as to whether they will be able to cope with the the more than doubling of the number of people in Crossways from the approved and planned housing around Crossways.
9. I have included my Encirclement map to illustrate the very significant developments approved and planned around Crossways, including the Redbridge Pit development whose inhabitants will all be dependent on the Summer Farm health centre, village hall and 2 shops in Crossways.

Summer Farm – 500 House Development

A vision for the land south of Warmwell Road



Summer Farm development

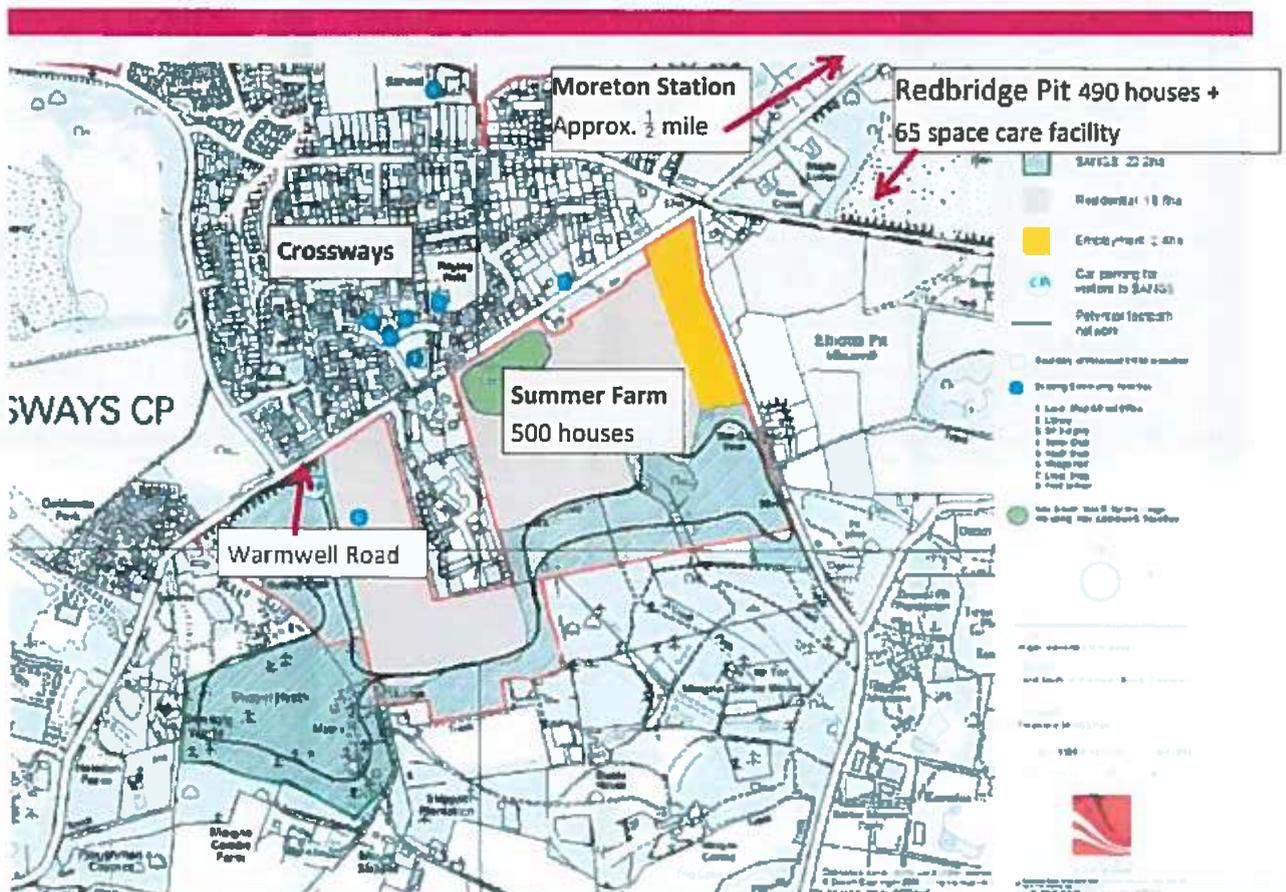
Crossways village

Extra people > 3273
 3208 @ 2 per 1604 houses
 (2011 Census for Crossways) +
 65 in care facility

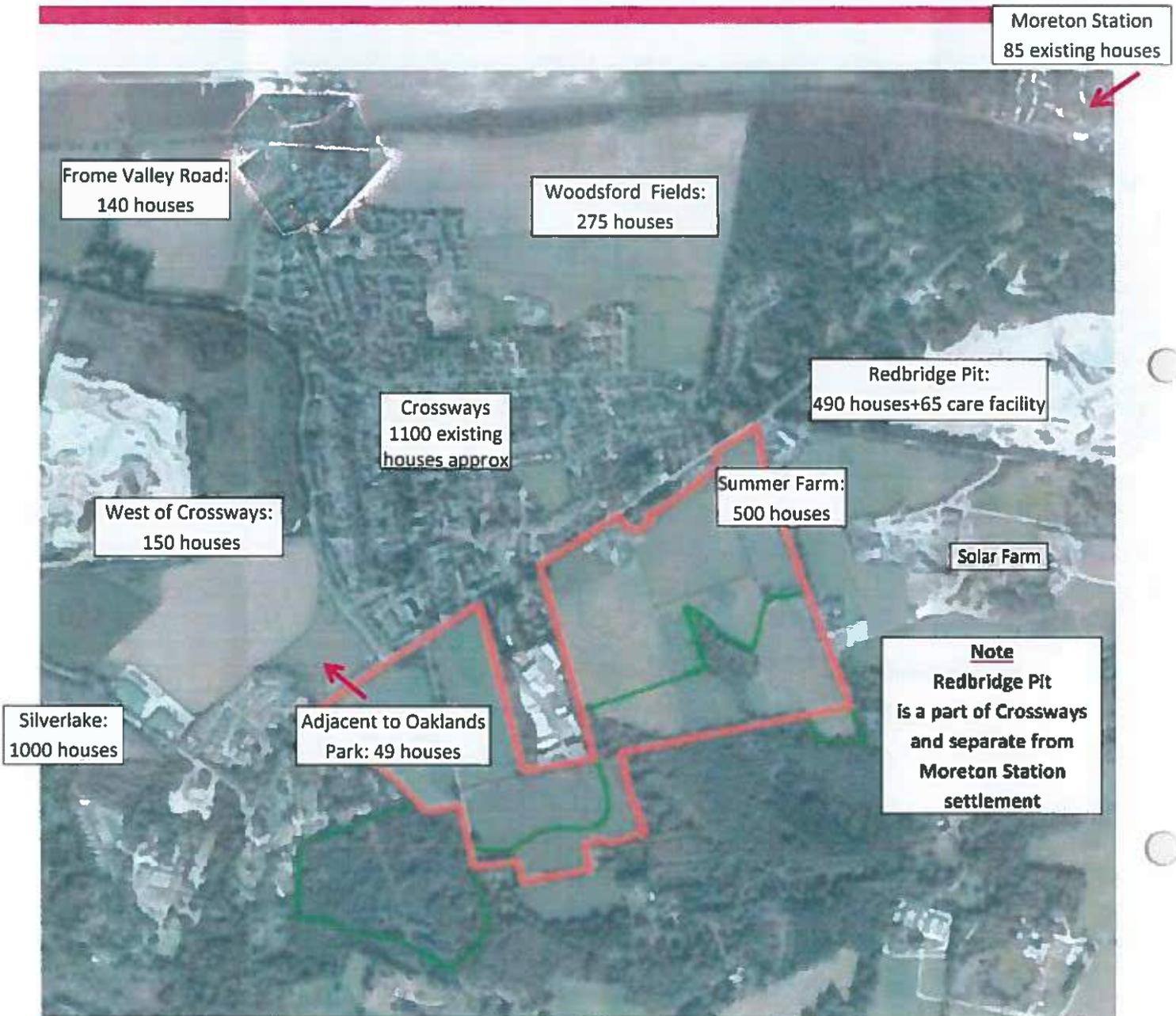
Traffic lights
 Not agreed for
 Warmwell Road

Warmwell Road/B3390

Extra cars: > 2246
 2246 @ 1.4 per 1604 houses
 (2011 Census for Crossway)
 Not including any cars for
 65 bed care Facility



Satellite photo showing Redbridge Pit, Summer Farm and Crossways





SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

H. SD94 – 79%

1. 79% of existing housing is east of the Worgret bridge

1. The figure on the next sheet shows that:
 - a. 79% of Purbeck District's current housing is east of the Worgret railway bridge just outside Wareham (column D, Existing Housing table).
 - b. 21% of Purbeck's current housing is west of the Worgret Bridge (100%-79%-21%).
 - c. 3.6% of Purbeck' housing is west of the Winfrith park (column E, Existing Housing table).
 - d. 0.4% of Purbeck's housing is at Moreton Station (column D, Existing Housing table).
 - e. 0% of Purbeck's housing is on Redbridge Pit, Crossways (column D, Existing Housing table).
 - f. 32% of the Purbeck Local Plan Submission's allocations are on Redbridge Pit (column P Allocations table).
 - g. Redbridge Pit is approximately 10 miles from the Worgret Bridge (map, distances measured on freemaptools.com)
 - h. Redbridge Pit is approximately 20 miles from Swanage (map, distances measured on freemaptools.com)
 - i. Swanage is Purbeck's largest settlement (columns A and B top) and is 69 times larger than Moreton Station (column C top [$5759 \div 83 = 69$]).
 - j. Moreton Station is number 22 out of 28 settlements in Purbeck (column A).
 - k. Redbridge Pit is number 28 on the list of Purbeck settlements (column A) though it is not a settlement as there are no houses on Redbridge Pit (column B).
 - l. The relative size difference between Redbridge Pit and Swanage and is shown on the graph. The graph also shows the relative size difference between Redbridge and the other top 7 Purbeck settlements.

79% of existing Purbeck housing is east of the Worgret Bridge, but 32% of Local Plan housing allocation is on Redbridge Pit 10 miles west

M N Hill - 10 September 2019

Telephone calls

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

Questionnaires Returns

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

Telephone calls

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

As a % of total no. of houses in location

Questionnaire

Averages

As a % of total houses = 31%

No of houses per response

Equates to 1 response per 22 houses

Crossways should have had 1100/22 = 50 calls but had 0

Column identifiers	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Swanage	1	5759	69	5759		1	5759									
Upton	2	3429	41	3429		1	3429									
Wareham Town (NP)	3	2728	33	2728		2	2728									
Wool	4	2159	26	2159		1	2159									
Lychett Matravers (NP)	5	1494	18	1494		3	1494									
W. Wareham St Martin	6	1159	14	1159												
Bere Regis (NP)	7	841	10	841												
Corfe Castle	8	710	9	710		2	710									
Arne (NP)	9	630	8	630		3	630									
Langton Matravers	10	479	6	479		4	479									
West Lulworth	11	383	5	383		5	383									
Worth Matravers	12	370	4	370		6	370									
Winfrith Newburgh	13	325	4	325		7	325									
Winfrith Newburgh	14	258	3	258		8	258									
Aff + Turners Puddle	15	220	3	220		9	177									
East Stoke	16	177	2	150		10	150									
Church Knowle	17	150	2	150		11	87									
East Morden/Morden	18	88	1	88		12	83									
East Lulworth	19	87	1	87		13	80									
Bloxworth	20	84	1	84		14	54									
Chaldon Herring	21	83	1	83		15	41									
Moreton Station	22	83	1	83		16	41									
Kimbridge	23	80	1	80		17	2									
Moreton village	24	76	1	76		18	2									
Steeple	25	54	1	54		19	2									
Coombe Keynes	26	41	0	41		20	0									
East Holme	27	38	0	38		21	0									
Redbridge Pit	28	0	0	0		22	0									
Moreton=village+station	29	159		159		23	0									
Crossways	30	1100		1100		24	0									

Column identifiers	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
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East Holme	27	38	0	38		21	0									
Redbridge Pit	28	0	0	0		22	0									

2. SD94 and the points raised in paragraph 1

2. SD94 does not address the fact that because only 3.6% of Purbeck's population lives to the west of Winfrith (column E Existing Housing table) and because 79% of the district's population lives east of Worgret Bridge it would be better to locate fewer houses on Redbridge Pit and more west of Worgret Bridge.
3. SD94 does not address the fact that since only 21% of Worgret's existing housing is west of the Worgret bridge and 63% of its allocated housing (column P, Allocations table) is west of the Worgret Bridge that there needs to be a correction involving reallocating some of the 32% of houses (column P, Allocations Table) allocated to Redbridge Pit to the east.
4. SD94 does not address the central question of housing need for so many houses to be allocated to Redbridge Pit when the existing population is so low based on housing.
5. SD94 does not address the sustainability issue of locating so many houses on Redbridge Pit, with no employment provision, when the majority of employment as indicated in Policy EE1 is east of the Worgret Bridge, a distance in excess of 10 miles. There is no employment in Crossways. The Winfrith Innovation Park will according to DCC take time to build up in employment and Purbeck admits that most of its workers will commute into the district because of the... *higher than normal level of in-commuting* (Local Plan Submission, page 87+88, paragraph 203):

Dorset Innovation Park is in the western edge of the District and will act as a hub for south Dorset with significant in-commuting from adjoining settlements, which has traditionally always been the case for the site. The longer and higher than normal level of in-commuting to the Dorset Innovation Park is partly as a result of the specialist skills required.
6. SD94 does not address how the Redbridge Pit site will support those needing affordable and market housing in Swanage, approximately 20 miles east.
7. SD94 does not address how a very small settlement, number 22 on the list of Purbeck settlements (column A), and an empty green field, number 28 on the list, located adjacent to a settlement described by the West Dorset Local Plan Inspector (Report on the Examination into the West Dorset, Weymouth & Portland Joint Local Plan dated 14 August 2015) on page 31 in paragraph 153 as being a *dormitory* can do anything for the rest of Purbeck over 10 miles away.
8. as being a dormitory by the West Dorset Local Plan Inspector in his
9. The 79% Figure highlights at the bottom of columns G,I, K and M in the AONB/Green Belt/No constraints table the number of houses already in the each of these designations. SD94 does not even mention the terms AONB and Green Belt. The table highlights that 84% of Purbeck's housing, totally 18,784 houses are already in the AONB, or Green Belt or in settlements that are constrained by the Green Belt.

10. SD94 does not address why adding houses to the 11,168 houses already in the AONB and Green Belt instead of locating them over 10 to 20 miles away on Redbridge Pit would be detrimental to the AONB and Green Belt. There are already 17 settlements in the AONB and Green Belt and Swanage is effectively depopulating (Swanage Local Plan, June 2017, page 11) since its population has not risen since 1991, whilst the rest of Purbeck has grown at about 9% over the same period (Section of this paper: F. SD94 – Crossways, 1st paragraph).
11. SD94 is thus totally remiss in not justifying why housing has been located on an empty field in Crossways at least 10 miles away from where approximately 79% of Purbeck’s population lives.

3. Redbridge Pit and Moreton Station Settlement Boundary

12. The boundary of Redbridge Pit is separated from the boundary of Moreton Station settlement by the caravan park and the railway line. This is shown on the SHLAA/0048 Site Plan, copied below:

Site Plan:



13. In planning terms Redbridge Pit is a green field in open country and hence any development on it qualifies for the term ‘sporadic development in the countryside’ given that at least 79% of Purbeck households live over 10 miles away to the east.
14. Development on Redbridge Pit does not accord with any of the Purbeck Local Plan Submission policies since it is definitely not small and is not next to an existing settlement (Policy H8 – Small sites next to existing settlements). The site is also not intended to provide rural exception housing (Policy H12 – Rural Exception Sites) and is not intended to provide homes for rural workers (Policy H13 – Rural workers homes in the countryside).
15. The caravan park is entirely separate from Redbridge Pit. It has never been included in any DCC minerals plans, mineral strategy, mineral sites plan or Redbridge quarry planning applications.

Indeed at the October 2018 Mineral Sites Plan there was some doubt as to whether it would be included in the Purbeck Local Plan Submission since its proposed relocation site would be just across a very busy road frequented by quarry lorries and hgv's from the proposed Station Road quarry.

16. The proposed relocation site and Station Road quarry are shown on my Encirclement Map included in the Crossways section.
17. SD94 does not address any of the requirements in NPPF section on Rural Housing on pages 21 and 22.
18. SD94 does not address the fact that the proposed housing on Redbridge Pit is not justified by any of the policies in the Local Plan Submission.

4. SD94 and the caravan site (SHLAA/0048)

19. The new caravan site will be detrimental to Dorset's main industry: tourism, since it will locate the caravans in a very noisy site, remote from Crossway and remote from the railway station at Moreton which many people on holiday in their caravans walk to from the nearby site.
20. SD 94 does not discuss why putting houses on the caravan site at least 10 miles from where they are needed, is preferable to the negative impact on the tourist industry by relocating the caravan to a markedly inferior sites.

5. SD94 and the care facilities

21. Only 3.6% of Purbeck's houses are west of Winfrith park (column E, Existing Housing).
22. The 79% Figure highlights that at least 79% of Purbeck's population lives east of the Worgret bridge.
23. Thus the care facilities proposed to be put on Redbridge Pit, but as yet undefined, will be at least 10 to 20 miles away from the population they are intended to serve.
24. For the people who will be resident in the care facility (assuming the facility does have permanent residents though after 7 years of this plan's gestation this has yet to be announced), it is likely that their families will have to undertake lengthy, time consuming and expensive journeys to visit their relations. It is therefore likely that permanent residents will be starved of the one element of their care which really matters: family visits.
25. SD94 does not discuss this issue, but should.

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

I. SD94 – Future Technologies

1. Some impacts of future technologies

1. The following are some examples of future technologies
2. Artificial General Intelligence. Artificial General Intelligence is a form of artificial intelligence that is adaptable to a number of applications rather than being for specific applications.
3. Because of this it will have a wider impact on employment. Many desk based jobs which require intellectual input will be vulnerable to being taken over by artificial general intelligence. For example AI programs currently produce financial information and other AI programs react to the information and place buy and sell orders.
4. AGI will also have a very major impact on the law, medicine, education, accountancy, local government, consultancy, etc
5. Robots. Robots already have a better sense of grasp than humans and robots can undertake a number of jobs which humans currently undertake. For example bricklaying and lifting an infirm patient into and out of a bath can already be undertaken by a robot.
6. 5G. This communication system will significantly aid the adoption of the internet of things. It will also enable driverless vehicles to be much more adaptable.
7. Driverless vehicles. Currently going through a learning phase but the billions of dollars being ploughed into their development means that in a few years they will start to become ubiquitous.
8. Electric vehicles. Already widely in use. Their universal adoption will mean that for example electric trains may be less sustainable for short journeys.
9. Home delivery. Currently a human based task but could easily be performed by a thinking robot in a driverless vehicle and use 5G communications to help solve any problems that arise.

2. The likely impact of future technologies in Purbeck.

10. A number of studies, including one quoted by the Bank of England which I have used in my responses to earlier Purbeck Local Plan consultations have shown that between 40 and 50% of the jobs in Purbeck could be automated during the period of the Local Plan.

11. The impact is likely to be widespread and not confined to simple jobs but will affect jobs which require an intellectual input.
12. Experience has also shown that when a manufacturer builds a new plant or updates an existing plant it may increase production but will probably reduce employment as more robots are employed.
13. It is illustrative that the people who created that program that won the game GO which was considered an AI breakthrough have said that they didn't know how the program won. The program developed a mind of its own.
14. It is likely that jobs will disappear in Purbeck and people will have to commute to Poole and Bournemouth to find work or migrate to another large city to find work.
15. Employers will want people who have the necessary skills and experience to work with the new intelligent systems which is why they will focus on cities because they will contain the largest pool of expertise.

3. SD94 and future technologies

16. SD94 does not mention future technologies.
17. SD94 does not make any attempt to understand that the future will not be like today. Purbeck staff still consider allocating as many houses as possible to a remote site an achievement.
18. Many more people will want to live in the east of the district in order to access jobs Poole and Bournemouth without the need to undertake daily 40 or 50 mile round journeys.
19. Many people will want to access the sort of training that will qualify them to undertake jobs with AI and robots. Purbeck council has shown no inclination to even consider this requirement. Dorset Council appears to be following in Purbeck's path.
20. As a result many more people will want to travel to Poole and Bournemouth to achieve the training they need. Because of the constantly changing nature of future technologies it will be necessary to frequently update skills through education and training.
21. Whilst older retirees may continue to migrate to Purbeck it is likely that younger people will increasingly leave to find work in Poole and Bournemouth and other cities.
22. Crossways is already a dormitory and future technologies will reinforce that role.

23. SD94 makes no attempt to look into the future, being content to merely put more and more houses in a dormitory which will be no use to people who need to work and raise families.

24. Very regrettably SD94 represents a backward looking, simplistic approach to planning.

SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

J. SD94 – Alternative Sites

1. SD 94 – alternative sites not discussed

1. SD94 conspicuously does not discuss whether other sites would be better as locations for more houses than Redbridge Pit.
2. This paper highlights a number of reasons why Redbridge Pit is the wrong place for Purbeck houses, let alone an increase in the number of houses allocated with the addition of a 65 place undefined care facility.

2. The Housing Market Area

3. The SHMA dated October 2015 states on page 19 in paragraph 2.3 that:

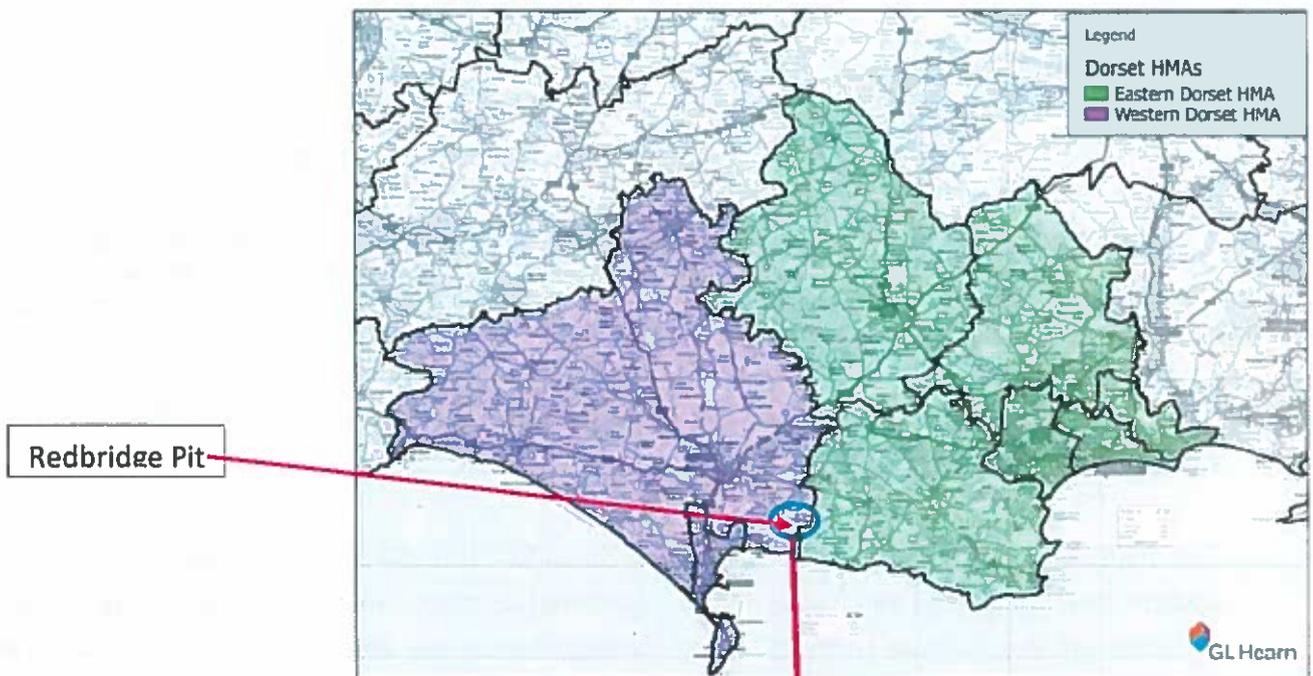
2.3 The Eastern Dorset Housing Market Area (HMA) was identified in a 2004 Study by DTZ for the South West Housing Body which sought to define housing market areas across the region. This identified that the bulk of Dorset fell into one of two HMAs: a Bournemouth/Poole market and one focused on Dorchester/Weymouth.

4. The Bournemouth/Poole HMA is known as the Eastern HMA and the Dorchester/Weymouth HMA is known as the Western HMA.
5. The dividing line between the two HMAs runs down Redbridge Road in Crossways, with the Redbridge Pit proposed 490 house plus an undefined 65 place care facility in the Eastern HMA on one side and the Summer Farm 500 house development in the Western HMA a little way to the south on the on the other side of Redbridge Road.
6. Purbeck District Council rigorously held to the line throughout all the consultations that the proposed development on Redbridge Pit was in the Eastern HMA.
7. This largely explains why virtually all their maps and documents do not display Crossways or any of the developments approved and planned for Crossways, and neither do they discuss the impact of the proposed Redbridge Pit development on Crossways.
8. Even the Submission SHLAA which is about the first Purbeck document to list some of the developments in Crossways does not consider the totality of the development of 1669 houses in a community of 1100 houses.

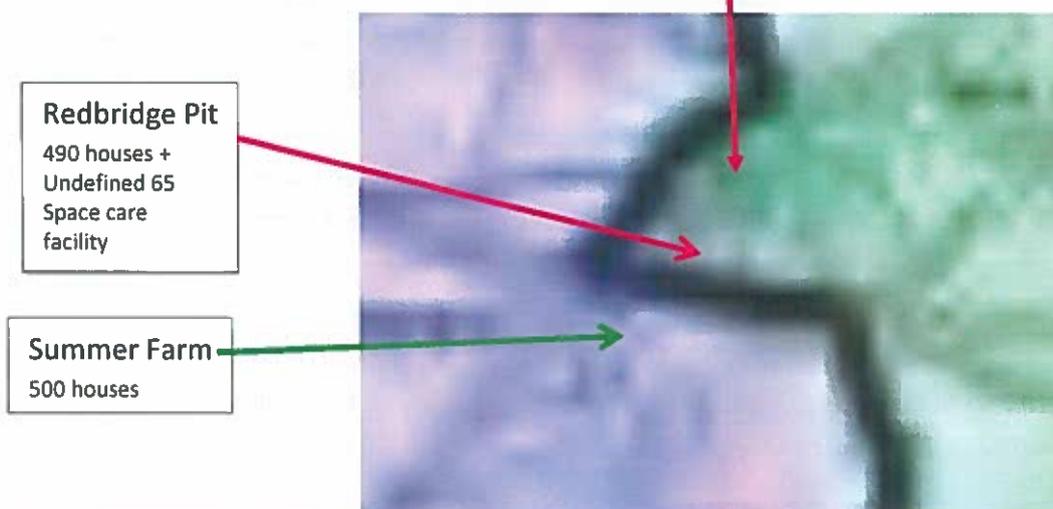
- It also explains why Purbeck documents refer to Redbridge Pit as being attached to Moreton Station, as in Moreton Station/Redbridge Pit in order to erroneously anchor the site to a settlement it is not in contact with in the Eastern Housing Market Area.
- After an extensive 14 page (pages 19 to 33) review of the definition of HMAs and their practical implementation, the SHMA states on page 33 in paragraph 2.58 that:

2.58 It is important to recognise that the market areas are not defined by hard and fast boundaries and in areas close to the defined boundaries, there are relationships and interactions in several directions. Similarly reflecting the geography of markets on the ground, significant housing development in a settlement may influence surrounding areas. However for strategic planning purposes, we have identified two HMAs covering the Dorset authorities based on a 'best fit' to local authority boundaries as a practical solution to support analysis and policy development. This 'best fit' geography is shown in Figure 10 overleaf.

Figure 10: Identified Housing Market Areas Across Dorset



Source: GL Hearn 2014



11. The first sentence of paragraph 2.58 states that:

It is important to recognise that the market areas are not defined by hard and fast boundaries and in areas close to the defined boundaries, there are relationships and interactions in several directions.

12. In the case of Redbridge Pit the relationships and interactions are almost all with Crossways, Dorchester and to a lesser extent with Weymouth.

13. These relationships and interactions are described in detail in the excellent West Dorset Council Rural Functionality Study, which has no date but appears to have been produced (page 2, *Purpose of the research*) in about 2008 in response to a requirement in *The Inspector's Report on the Revised Deposit Local Plan (2006)*.

14. The second sentence of the above SHMA quote states: ,

...significant housing development in a settlement may influence surrounding areas...

15. I have shown in Section G – Summer Farm development, that there are a number of approved and planned housing developments in Crossways totalling 1114 houses (my Evolution table in the Introduction – right hand column)). The Purbeck Local Plan Submission does not consider any of these development, but the SHMA quote above indicates that the Purbeck Local Plan Submission should take note of these 1114 houses in a community of about 1100 houses and consider whether it is right to allocate any houses to Redbridge Pit let alone 490 plus a 65 place undefined care facility.

16. On page 33 in paragraph 2.54 the SHMA states:

2.54 The analysis suggests that parts of Purbeck and North Dorset relate to different market areas, with Crossways and Wool falling within the Western market

17. And continues on page 33 in paragraph 2.55:

2.55 However, whilst this reflects the reality of spatial relationships, for pragmatic reasons we would recommend that HMAs are drawn on the basis of local authority boundaries.

18. The demise of the Purbeck and West Dorset Districts and the creation of the unitary Dorset Council, means that the *..pragmatic reasons..* no longer matter and it is the *...spatial relationship...* which is more important in Crossways and Redbridge Pit

3. The 'Dorset Council' HMA

19. With the creation of the unitary Dorset Council, it is now more appropriate to refer to a Dorset Council HMA because Purbeck Council and its boundary no longer exist.
20. The Eastern Housing Market Area has now shrunk to Poole and Bournemouth. After consideration Dorset Council could decide to include the spatial areas of eastern Purbeck within the Bournemouth, Christchurch and Poole HMA.
21. The houses allocated to Redbridge Pit are intended to support the Eastern HMA and its spatial relationship with Poole and Bournemouth. In response to my written statements on the HMAs in past consultations, Purbeck Council have always formally insisted that the houses allocated to Redbridge Pit were part of the Eastern HMA.
22. With the demise of the Eastern HMA, these houses have become marooned beyond where they are required: in the spatial area of Purbeck which relates to Bournemouth and Poole.
23. As I have been repeatedly and formally told in print, the Redbridge Pit allocation is not intended to support the Western housing Market Area.
24. The Redbridge Pit allocation should therefore be reallocated to the east so that its houses continue to support the spatial area of the former Eastern HMA.
25. The Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options Consultation discusses Crossways in Chapter 12 (page LPR 244) and identifies the 5 sites and allocations required for West Dorset to achieve its required overall housing development total as shown on pages LPR 80 to 82.
26. This means that the proposed Redbridge Pit housing allocation is not required in Crossways to support the Dorchester Spatial Area.
27. But there is definite need in the east of the former Purbeck District for these houses. Locating these houses over 10 miles from where approximately 79% of the former Purbeck District lives, does nothing, as I have repeatedly stated in my consultation responses, for the overwhelming majority of the district who are orientated to Poole and Bournemouth and definitely not Dorchester and Weymouth.
28. SD 94 does not even mention the Housing Market Areas or recognise that with the creation of Dorset Council that it is the spatial areas which are now important.

29. Since the houses were allocated to Redbridge Pit to support Purbeck's population and had nothing to do with supporting Crossways' population the allocation should be assigned to a site or sites in the east.

Purbeck Local Plan Partial Review Options Consultation, June 2016.

30. The Purbeck Local Plan Partial Review Options Consultation, June 2016 identified a number of good sites in the east of the district which are worth serious consideration now that there is no need to allocate houses to Redbridge Pit with the demise of Purbeck Council and the former Eastern Housing Market Area.

31. The Preferred Option 3 – Development Strategy is given on page 23 and 24.

32. It is noteworthy that the June 2016 Options Consultation does state in the table on page 22 that at Moreton Station the:

Council would not accept development on the caravan site.

33. The caravan site is now SHLAA/0048 in the Submission SHLAA.

34. And on page 31 in Site 4 – Moreton Station:

The Council's preferred option is for around 350 homes in this location

35. The site is now referred to as Moreton Station/Redbridge Pit and the allocation is 490 homes and an undefined 65 place care home, giving a total housing allocation of 555 houses.

36. SD94 did not, as I have said, even mention the word alternative let alone consider whether might be a more deserving location for the additional houses on Redbridge Pit or even consider whether Redbridge Pit was a worthwhile site for Purbeck given that it is so far from the rest Purbeck.

37. Lytchett Minster. This site is in the Green Belt about a mile from the edge of Upton and the Poole-Bournemouth conurbation. The number of houses allocated was 650. This is an excellent site to develop with the need to provide houses for workers faced with the introduction of future technology as I described in the Section I Future Technology.

38. With employment becoming ever more fragile as AGI and robots etc start to take over jobs, and the need to access frequent lifetime retraining and education, workers will not have the disposable income or time to spend on long distance commuting.

39. The relaxation of the Green Belt in this location is far more deserving than the proposed scheme at Morden Park. The benefits to be achieved from the relaxation of the Green Belt at Morden Park are at best dubious
40. Development of this site would also have the benefit of removing the need to develop other sites further into Purbeck. This in turn would reduce the traffic build up on Purbeck's roads and associated atmospheric pollution.
41. I have copied the Site2- Lytchett Minster page from the Options Consultation June 2016 at the end of this section because it provides a good explanation of the merits of the site and the support the site received.
42. West of Wareham. This really is a definite site for development. The site is only separated by a road from Wareham town. North Wareham is far more disjointed from Wareham town by the busier A351 and 2 very busy roundabouts and by the railway line. Whether one attempts to travel by foot, bike or car between North Wareham and Wareham Town it is a hazardous journey.
43. By comparison all that is required to join the West of Wareham site to Wareham town is a footbridge over the A351
44. The West of Wareham site is on the edge of the AONB. Development on this site would have extremely little impact on the AONB which ends by the A352 on the northern side of the site. By comparison the development of Poundbury on the edge of Dorchester and in the AONB, dominates the surrounding AONB and countryside for many miles including the Iron Age fort of Maiden Castle.
45. Only an extreme purist would consider that development of the site West of Wareham would be detrimental to the AONB.
46. The site had an allocation of 500 homes in the Options Consultation June 2016.
47. This site also has the great advantage in that it is on the correct side of Worgret Bridge, the eastern side, and therefore is much closer to the 79% of Purbeck people who live east of the Worgret Bridge.
48. SD52 Sustainability Appraisal, April 2016 provides a comparison between Wareham West, Wareham North and Redbridge Pit (Moreton Pit).
49. I have reproduced the comparison below. This clearly shows that Redbridge Pit is inferior to Wareham West and provides very good justification for allocating 500 houses to the Wareham West site.

SD52 Sustainability Appraisal - April 2016		Sustainability Score (By M N Hill based on PDC assessments)	
Pages 155-158	Wareham West: 500 houses	16	most sustainable
Pages 158-162	Wareham North: 210 houses	10	
Pages 162-166	Moreton Pit: 490 houses + 65 bed care home	6	least sustainable

PDC assessment shows that:
**Wareham West is the most sustainable ,
 Moreton Pit is the least sustainable**

Criteria	Wareham W: 500			Wareham N: 210			Moreton Pit: 490+65 bed care home			By M N Hill: Assigning a numerical score to the assessments
	Short	Medium	Long	Short	Medium	Long	Short	Medium	Long	
Meet as much of Purbeck's <u>housing need</u> as possible	++	++	++	++	++	++	++	++	++	6
Promote <u>services and facilities</u> where need is identified	++	++	++	+	+	+	+	+	+	3
Harness the <u>economic potential</u> of tourism and widen employment opportunities in Purbeck	++	++	++	++	++	++	+	+	+	3
Help everyone <u>access basic services</u> , <u>reduce the need to travel by car</u> & encourage cycling, walking and use of public transport	++	++	++	+	+	+	+	n	-	0
Reduce vulnerability to <u>flooding</u> and <u>coastal change</u> , and adapt to <u>climatic changes</u>	n	n	n	n	n	n	n	n	n	0
Protect & enhance habitats and <u>species and local geo-diversity</u>	-	n	n	-	n	n	-	n	n	-1
Protect & enhance Purbeck's unique <u>landscape & townscape</u> , & cultural & historic assets	-	-	-	-	-	-	-	n	n	-1
Minimise all forms of <u>pollution</u> and consumption of <u>natural resources</u>	-	-	-	-	-	-	-	-	-	-4
	16			10			6			
	Wareham W: 500			Wareham N: 210			Moreton Pit: 490+65 bed care home			

50. I have copied the Site3- West of Wareham page from the Options Consultation June 2016 at the end of this section because it provides a good explanation of the merits of the site and the support the site received.

51. Key feedback. The Options Consultation, June 2016, states on page 23 in paragraph 81 that:

The key feedback from the issues and options consultation is for the desired to locate development in sustainable locations; spread it as much as possible; and maximise new infrastructure.

52. SD 94 has taken the opposite approach to the above statement.

53. SD19, The Housing Background Paper dated January 2019 states on page 16 in paragraph 64:

.... the Council's approach is to spread development across the District as far as possible to meet the housing needs of local people.....

54. SD94 proposes the complete opposite of spreading development and with a sense of achievement states the addition of an extra 50 houses means that the total number of dwellings comes:

.... very close to the original capacity assessment of 600 homes.

55. SD94 and the Submission Local Plan concentrate development in the west of the district in two locations. The addition of a further 50 homes to the Redbridge Pit allocations is directly against the principle of spreading development.

56. SD94 and the Submission Local Plan make no claims to increasing infrastructure and even in the MOU between the council and the developers there is doubt about adding just one shop, the sum of development from the Redbridge Pit development.

57. The proposal to build a car park on the former caravan site will not benefit the new residents of the proposed Redbridge Pit development since they are already within walking distance of the station.

58. The site cannot be considered a sustainable site since the Inspector in his Report on the Examination into the West Dorset, Weymouth and Portland Joint Local Plan, dated 14 August 2015 (the extant West Dorset Local Plan), stated on page 33 in paragraph 165 that:

Crossways is close to Dorchester but without substantial enhancements to transport links I do not consider it is a particularly sustainable option for meeting the longer term needs of the county town.

59. Swanage – SHLAA/0057 page 155 Capacity 132 houses. This is a suitable site for development though the Submission SHLAA rejects it because of an impact on the AONB. It is difficult to see how one small site could create a detrimental impact on the AONB when the sprawling town of

Swanage is close by. There is nothing in the Submission Local Plan about Swanage being detrimental to the AONB, and hence the addition of this relatively small site will not have a negative impact on the AONB

Site 2 - Lytchett Minster

The Council's preferred option is for around 650 homes in this location.

It is in the green belt and the Council's green belt review concludes that development here would be contrary to the aims of the green belt, as set out in national policy. However, national policy does allow councils to allocate such sites, where development promotes sustainable development. Owing to the proximity of Upton and the Poole / Bournemouth conurbation and their facilities and services, the Council believes there is a strong case to argue that this site could help promote sustainable development. Given that traffic flows would be likely to be predominantly in the direction of the conurbation, development here would have less of an impact on the A351, compared with development elsewhere.

Policy LD (General Location of Development) of the PLP1 categorises Lytchett Minster as an other village with a settlement boundary. This policy aims to direct development towards towns as the most sustainable settlements in the district in the first instance, then key service villages, then local service villages. However, it would not be possible to meet the district's housing needs in these larger settlement groups. Given this, the sustainability benefits of development here and the infrastructure it could provide, the Council would support development in this location.

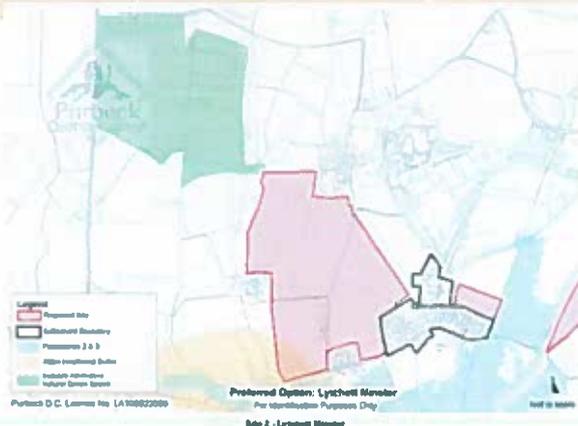
Dorset County Highways has confirmed that the site could be developed satisfactorily from a transport perspective, subject to provision of appropriate mitigation. Highways improvements which are likely to be required include provision of pedestrian, cycle and public transport links to and through Upton, Hamworthy and Poole town centre. There may also be requirements for improvements to Bakers Arms roundabout, measures to improve visibility at Huntick Road / Randalis Hill junction, and pedestrian / cycle access into Upton over the bypass (Watery Lane link).

Natural England has confirmed that open space (SANG) could be delivered to mitigate impacts on nearby heathland. This would open up around 40ha of open space in the green belt to the public. Direct links will be required from the new housing to the SANG, in order to ensure that it is easily accessible to residents.

The Council is aware of groundwater flooding issues around Lytchett Minster. The Council is committed to working with the developer, Dorset County Council (as lead local flood authority) and the Environment Agency to ensure that development would not exacerbate flooding and identify where it could help resolve existing problems, where possible.

In addition to the SANG, there could be potential for small scale employment and retail, allotments, walking / cycling routes, and play areas and other open space. It is likely that contributions towards expansion of the secondary school will be required. Additional primary school provision will be required in north east Purbeck. There are two potential sites, one here and the other at Upton. The Council is currently in discussions with Dorset County Council as to the better option.

The Council would welcome your views as to the supporting infrastructure or services and facilities that should be provided as part of the development scheme.



Site 3 - West Wareham

The Council's preferred option is for around 500 homes in this location. Whilst the Council is mindful of public opinion being less favourable towards development west of Wareham, it needs sound planning reasons to rule the site out. The key outstanding issue that the Council is currently working to resolve is whether or not the landscape impacts on the AONB could be moderated to an acceptable level. If the landscape issues cannot be moderated, the Council will need to find alternative land for development.

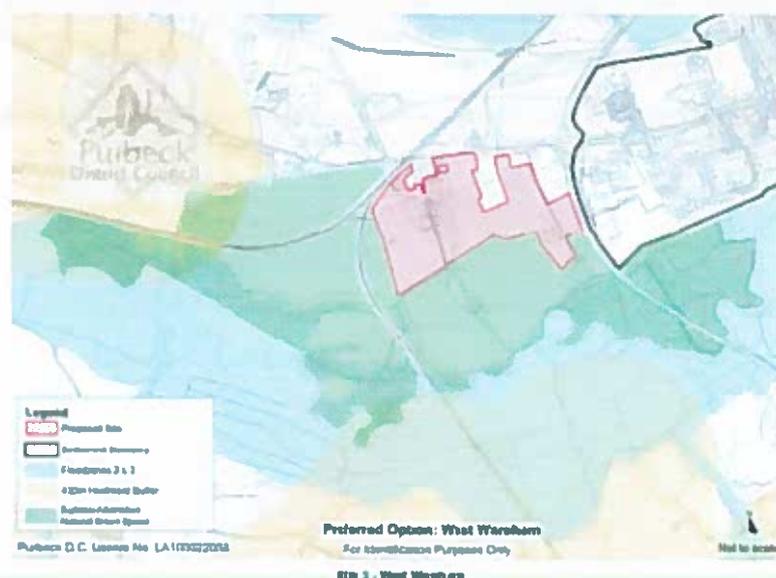
The site is in Arne parish, but it would effectively be an expansion of Wareham, which is a town. Policy LD (General Location of Development) of the PLP1 lists towns as the most sustainable settlements in the district and this is where development should be focussed, wherever possible.

Dorset County Highways has confirmed that the site could be developed satisfactorily from a transport perspective, including impacts on the A351, subject to provision of appropriate mitigation. Highways improvements could include footpath and cycle links to the existing network and town centre, Purbeck School and the railway station, and the creation of a new 30mph gateway into Wareham. There could be potential for public transport improvements.

Natural England has confirmed that open space (SANG) could be delivered around the periphery of the site to mitigate impacts on nearby heathland. This would open up around 80ha of open space in the AONB to the public and a further 14ha set aside solely for biodiversity enhancements.

In addition to the SANG, there could be potential for a new local centre (small scale employment and retail); a new primary school, if required; allotments; and play areas and other open space.

The Council would welcome your views as to the supporting infrastructure or services and facilities that should be provided as part of the development scheme.



SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

K. SD94 – Housing Market Areas

1. The Housing Market Area

1. The SHMA dated October 2015 states on page 19 in paragraph 2.3 that:

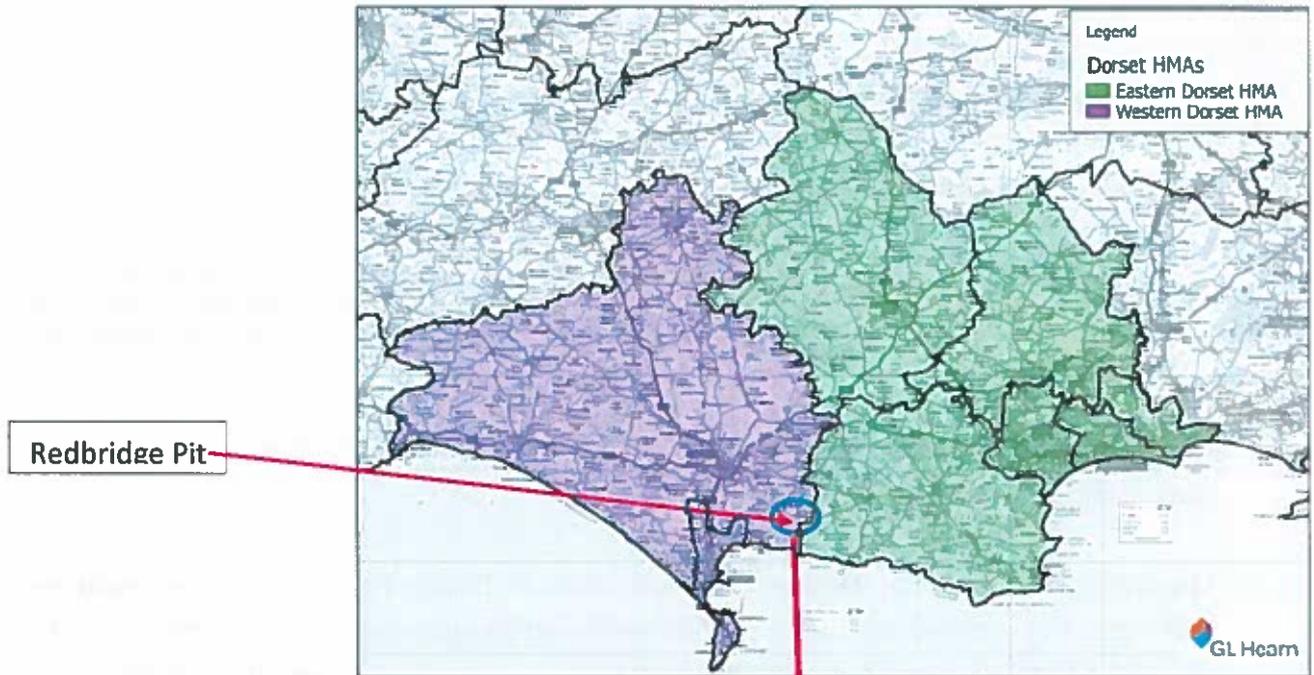
2.3 The Eastern Dorset Housing Market Area (HMA) was identified in a 2004 Study by DTZ for the South West Housing Body which sought to define housing market areas across the region. This identified that the bulk of Dorset fell into one of two HMAs: a Bournemouth/Poole market and one focused on Dorchester/Weymouth.

2. The Bournemouth/Poole HMA is known as the Eastern HMA and the Dorchester/Weymouth HMA is known as the Western HMA.
3. The dividing line between the two HMAs runs down Redbridge Road in Crossways, with the Redbridge Pit proposed 490 house plus an undefined 65 place care facility in the Eastern HMA on one side and the Summer Farm 500 house development in the Western HMA a little way to the south on the on the other side of Redbridge Road.
4. Purbeck District Council rigorously held to the line throughout all the consultations that the proposed development on Redbridge Pit was in the Eastern HMA.
5. This largely explains why virtually all their maps and documents do not display Crossways or any of the developments approved and planned for Crossways, and neither do they discuss the impact of the proposed Redbridge Pit development on Crossways.
6. Even the Submission SHLAA which is about the first Purbeck document to list some of the developments in Crossways does not consider the totality of the development of 1669 houses in a community of 1100 houses.
7. It also explains why Purbeck documents refer to Redbridge Pit as being attached to Moreton Station, as in Moreton Station/Redbridge Pit in order to erroneously anchor the site to a settlement it is not in contact with in the Eastern Housing Market Area.
8. After an extensive 14 page (pages 19 to 33) review of the definition of HMAs and their practical implementation, the SHMA states on page 33 in paragraph 2.58 that:

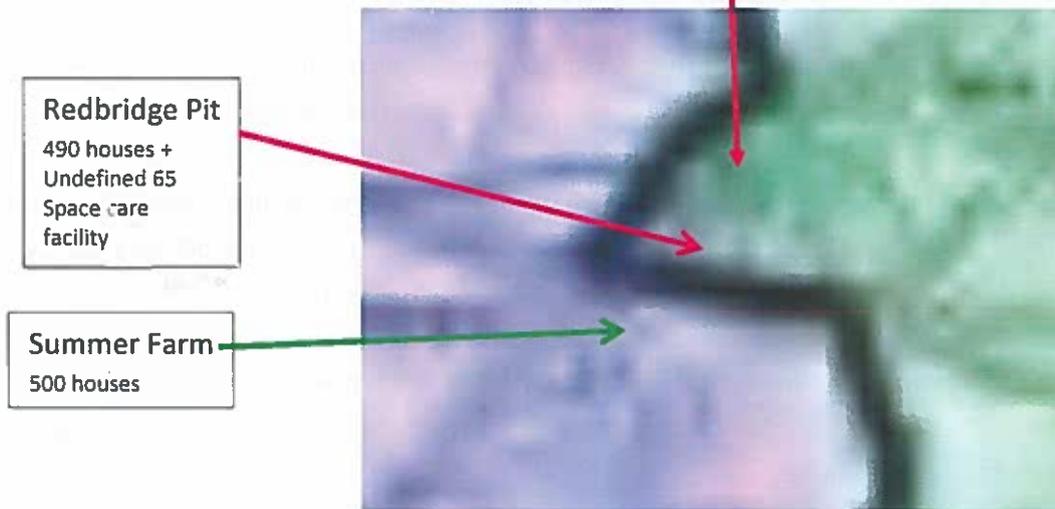
2.58 It is important to recognise that the market areas are not defined by hard and fast boundaries and in areas close to the defined boundaries, there are relationships and interactions in several directions. Similarly reflecting the geography of markets on the ground, significant housing development in a settlement may influence surrounding areas. However for strategic planning purposes, we have

identified two HMAs covering the Dorset authorities based on a 'best fit' to local authority boundaries as a practical solution to support analysis and policy development. This 'best fit' geography is shown in Figure 10 overleaf.

Figure 10: Identified Housing Market Areas Across Dorset



Source: GL Hearn 2014



9. The first sentence of paragraph 2.58 states that:

It is important to recognise that the market areas are not defined by hard and fast boundaries and in areas close to the defined boundaries, there are relationships and interactions in several directions.

10. In the case of Redbridge Pit the relationships and interactions are almost all with Crossways, Dorchester and to a lesser extent with Weymouth.

11. These relationships and interactions are described in detail in the excellent West Dorset Council Rural Functionality Study, which has no date but appears to have been produced (page 2, *Purpose of the research*) in about 2008 in response to a requirement in *The Inspector's Report on the Revised Deposit Local Plan (2006)*.

12. The second sentence of the above SHMA quote states: ,

...significant housing development in a settlement may influence surrounding areas...

13. I have shown in Section G – Summer Farm development, that there are a number of approved and planned housing developments in Crossways totalling 1114 houses (my Evolution table in the Introduction – right hand column)). The Purbeck Local Plan Submission does not consider any of these development, but the SHMA quote above indicates that the Purbeck Local Plan Submission should take note of these 1114 houses in a community of about 1100 houses and consider whether it is right to allocate any houses to Redbridge Pit let alone 490 plus a 65 place undefined care facility.

14. On page 33 in paragraph 2.54 the SHMA states:

2.54 The analysis suggests that parts of Purbeck and North Dorset relate to different market areas, with Crossways and Wool falling within the Western market

15. And continues on page 33 in paragraph 2.55:

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 25. But there is definite need in the east of the former Purbeck District for these houses. Locating these houses over 10 miles from where approximately 79% of the former Purbeck District lives, does nothing, as I have repeatedly stated in my consultation responses, for the overwhelming majority of the district who are orientated to Poole and Bournemouth and definitely not Dorchester and Weymouth.
 26. SD 94 does not even mention the Housing Market Areas or recognise that with the creation of Dorset Council that it is the spatial areas which are now important.
 27. Since the houses were allocated to Redbridge Pit to support Purbeck's population and had nothing to do with supporting Crossways' population the allocation should be assigned to a site or sites in the east.

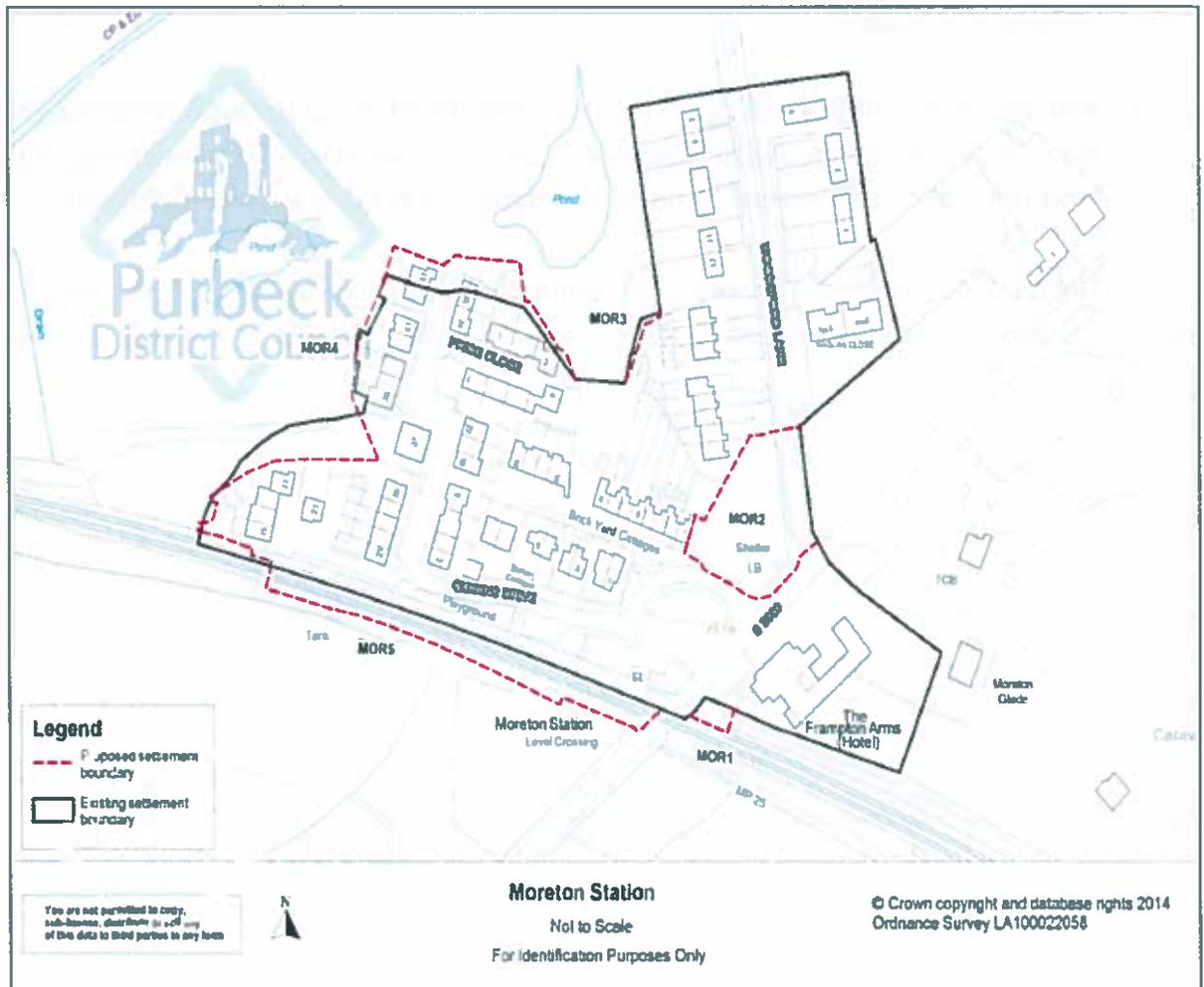
SD94: Explanation of changes to housing numbers at Moreton Station/Redbridge Pit

L. SD94 – Moreton Station Boundary

1. Moreton Station Boundary

1. As part of the Purbeck Local Plan Partial Review Purbeck District Council published the Moreton Station Boundary Review, January 2015. The map below has been copied from page 5 of the Boundary Review document.

Map of the existing and proposed settlement boundary



No contact between Moreton Station and the caravan park and Redbridge Pit

2. The map shows that neither the caravan site SHLAA/0048 or Redbridge Pit SHLAA/0049 are in contact with Moreton Station Settlement.

3. Redbridge Pit is separated from Moreton Station by the caravan site and the railway line.
4. The term Moreton Station/Redbridge Pit is used in SD94 and the Local Plan Submission to indicate that Redbridge Pit boundary is contiguous with the Moreton Station boundary.
5. It is not. The two are separated by about 250 metres, measure on Ordnance Survey Outdoor Leisure 15 Purbeck & South Dorset, scale 4 cm to 1 km- 2 $\frac{1}{2}$ in to 1 mile.

Crossways/Redbridge Pit or Crossways/Moreton Pit

6. Redbridge Pit boundary does touch the Crossways boundary on Redbridge Road.
7. It would be far more appropriate to refer to Crossways/Redbridge Pit than Moreton Station/Redbridge Pit.
8. With the demise of Purbeck District Council and, therefore, of the Eastern Housing Market boundary running along Redbridge Road there is no reason to refer to Redbridge Pit as being part Moreton Station and instead it should be referred to as Crossways/Redbridge Pit.
9. The DC minerals department and the Ordnance Survey refer to Moreton Pit and not Redbridge Pit. It would be more correct to refer to Crossways/Moreton Pit.

SD95: Care home provision modification to improve clarity

SD95**SD 95 – Changes to the policy**Paragraph 2.

1. SD95 states in paragraph 2 that Dorset Council (DC) is:

moving towards providing extra care housing.

2. The paragraph does not explain the costs of extra care housing. Typically how much are the houses?

3. Paragraph 2 also states that:

Extra care housing provides more care than specialist purpose built accommodation such as sheltered housing or retirement living: it is where people have access to personal care and support services available up to 24 hours per day, their own front doors and tenancy or even ownership rights.

4. This sentence does not compare the new form of care with the care obtained in *traditional nursing care homes* (paragraph 2). Does this mean that the care is inferior?
5. *Traditional nursing care* homes usually provide meals and the patients do not have to do the cleaning. These can be difficult tasks for an elderly person to undertake. Do the support services undertake these tasks and if so do they represent an additional cost?

Paragraph 3.

6. Paragraph 3 states:

It is now considered that extra care housing will be the best way to deliver this need (either as C2 or C3 depending on consultation with health and care providers).

7. The SHMA makes a distinction between C2 and C3 housing and care. I have discussed this in much more detail in my comments on SD94.
8. On page 203 of the SHMA, in paragraph 10.81 under the title *Need for Registered Care Provision*, the SHMA states that:

Registered care provision fall within a C2 use class; with households who live in care homes counted as part of the institutional rather than the household population. As such provision of residential care provision is treated in the analysis of housing need separately in this report from that for C3 dwellings.

9. Thus C2 are households who live in care homes and C3 is normal market housing.
10. SD95 does not indicate how the distinction is made for a patient between C2 and C3.
11. SD95 also does not address the fact that someone may well start as a C3 person but with age become a C2 person. The housing for C3 presumably is different from that for C2, it appears to be treated differently in the SHMA, how does a person change from C3 to C2?
12. Paragraph 3 also states that:

Providing this care within the largest allocated sites will enable the residents to be well connected to their communities. To make this intention clear, the wording in Policy H4, H5 and H9 needs to be altered.

13. Moreton Station has 83 households and thus the care provision is only 21 households smaller at 65. Thus very few of the 65 care residents will be from Moreton Station.
14. Purbeck District Council stated formally in response to my letters that the Redbridge Pit allocation was part of the allocation to serve the Eastern Housing Market area. This means that communities from which the majority of the patients will come will be 10 to 20 miles away to the east, since 79 % of Purbeck households live east of the Worgret bridge just outside Wareham.
15. SD95 does not indicate how the care patients on Redbridge Pit will be well connected to their communities 10 to 20 miles east?
16. Since many older people give up driving or have to give up due to a personal condition, they will not have easy access to their communities 10 to 20 miles east. Conversely people from their former communities and relations may well have to make 20 to 40 mile round journeys to see a person in the care facility on Redbridge Pit
17. SD95 does not address this issue.

Paragraph 7.

18. SD95 paragraph 7 states that:

The actual care provision will be adaptable and determined in consultation with health and social care providers with needs being met via a range of interventions and services. It is anticipated that the care provided will be flexible enough to respond to the changing needs of an ageing population, those with disabilities and supportive of those with increasing health problems.

19. This is less than satisfactory. In particular:

It is anticipated that the care provided will be flexible enough to respond to the changing needs of an ageing population, those with disabilities and supportive of those with increasing health problems.

20. With 2 different types of housing, C2 and C3 and an *ageing population* which may well include people suffering from dementia or lack of mobility etc there is a definite need to include statements in the Local Plan about how this situation will be dealt with. It will need physical infrastructure.

21. Statistics on the percentages of the population and age profiles of people who are suffering a debilitating condition or are likely to suffer as they get older have been generated by the National Health Service over decades.

22. Thus paragraph 7 is particularly vague and useless.

Paragraph 8.

23. The SHMA was published in October 2015.

24. A version of the Table in paragraph 8 could have been produced at that time and then updated as the allocation sites and allocations changed. There was no need to wait nearly 4 years to publish the table..

SD95 - Proposed modifications to Purbeck Local Plan 2019-2034

Policy V1: Spatial strategy for sustainable communities

25. Regretably the anodyne and brief statement that is proposed is all that can be said because, after almost 8 years of a programme that should have been completed in 5 years, SD95 does not provide any clarity upon which a more informative Policy could be based.

Policy H4: Moreton Station / Redbridge Pit

26. Policy H4 is even more lamentable than Policy V1.

27. The policy refers to *community facilities and supporting infrastructure*.

28. I tried very hard during the Examination to find out what community facilities and supporting infrastructure is to be provided. But in vain

29. SD95 provides no help.

Policy H9: Housing Mix

30. The first 3 paragraphs of Policy H9 follow the guidance in the SHMA and are agreed.
31. The fourth paragraph states: *...supported both through..* and relies on the ~~and at allocated sites...~~ which has been deleted.
32. Thus the word *both* should be deleted.

Glossary

33. The word *available* confuses the sentence and the three *availables* should be deleted
34. The word *but* in the sentence on the third line: *...regular basis but where no* should be deleted since the sentence has already stated that personal care is not provided.
35. The glossary statement indicates that personal care will not be available 24 hours a day, 7 days a week.
36. The registered personal care may be not always be available and the substitute warden may in turn not always be provided. As written the care facilities may not always have either registered personal care or a warden.
37. There is no indication what specialist training or qualification the warden will possess.

Summary

38. The title to SD 95 ends with the words *to improve clarity* as though there already was some clarity about the care home provision.
39. This is most definitely not the case.
40. Regrettably SD95 makes the subject of care home provision on Redbridge Pit even less clear.

Purbeck Local Plan Submission

41. Even with the proposed changes above the Local Plan provides so little information on the care facilities that it would be wrong to endorse and publish the Local Plan.
42. Put simply: there is so little about the care facilities that the Local Plan does not function as a Local Plan with respect to the care facilities. There is virtually nothing upon which to plan the physical requirements of the care facilities.

SD98: Estimation of affordable homes from small sites and windfall

SD98

1. Estimation of likely affordable housing numbers

1. Paragraph 3 states:

3. It should however be noted that the application of policies in the local plan will often require part of a house to be delivered. In these instances, a financial contribution would be taken equivalent to the part that cannot be delivered on-site. These contributions will then be used to deliver affordable housing elsewhere within the area

2. I have underlined the last sentence. How is the area defined now that Purbeck District is no more?
3. How long will money be held?

Contribution from Allocated sites

4. The Neighbourhood Plan Allocations is stated as 290.
5. Policy V1 on page 20 of the Local Plan Submission states:

*Wareham – 300 new homes including windfall
Bere Regis – 105 new homes.*

6. Why is the capacity 290 and not 405?

Windfall

7. The Plan Period is stated on the Local Plan Submission as 2018 – 2034, 16 years.
8. 10.4 windfall affordable housing units a 0.8 per year equals 13 years.
9. This would equate to 2021 to 2034
10. If the average number of windfall sites per year is 62, the total over the 13 year period would be 806 windfall houses producing 10.4 affordable homes.

Total Estimated Delivery from all Sources

11. The table on page 4 shows that allocated sites will contribute 610.6 houses.

12. On page 2 the Proposed Local Plan Allocations contribute 516 affordable houses.
13. The difference is 94.6.
14. This equates to approximate a further 235 allocated houses.
15. The paper does not explain the reason for the difference between the Allocated sites Affordable Housing estimate on page 2 (516 houses) and the Allocated sites Potential affordable homes total (610.6 houses) on page 4.
16. What is the reason?

Redbridge Pit

17. Allocation 490 houses, affordable component 196 houses at 40%.
18. This is 38% of the 516 total affordable homes in the table on page 2.
19. Redbridge Pit contains 1% of Purbeck's population (on 79% figure).
20. Unfortunately this 38% of affordable homes is over 10 miles from where 79% of Purbeck's existing houses are located.
21. Is it right that the largest single supply of affordable homes is 10 miles from where 79% of Purbeck's population lives and in a location which the West Dorset Local Plan Inspector stated in his report, dated 14 August 2015, on page 33 in paragraph 165:

Crossways is close to Dorchester but without substantial enhancements to transport links I do not consider it is a particularly sustainable option for meeting the longer term needs of the county town

22. There has been no change in the transport links.
23. Why put 196 affordable houses (together with Maple Lodge's 4 = 200 affordable houses) in a location which an Inspector has said he does not consider to be a particularly sustainable option...?
24. This was not discussed in SD85 Housing Need, or SD94 Explanation of housing numbers at Moreton Station, but should have been a prominent subject.

Response to amendments to Purbeck Local Plan

Consultees **1191476**, 1191015, 1190535

Statement on Amendments

This statement is made on behalf of 61 residents in Glebe Road Lytchett Matravers who strongly oppose the proposed development of 95 houses n Green Belt Land on the site east of Wareham Road Lytchett Matravers (SHLAA/0026)

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There will be an increased pressure on Wareham Forest and Heathland as new residents at the south side of the village, will, as current residents do, choose to go to the more convenient and beautiful places thus increasing pressure on Heathlands with the additional footfall of people and their pets.

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In conclusion, throughout the modifications in SD14 there is repeated reference to SANGs mitigating the impact of the damaging effect on habitat, Heathland and Poole Harbour; as the first letter of this acronym is S, we assume the emphasis is on suitability. The SANG proposed for the village of Lytchett Matravers is entirely unsuitable for sustainability and mitigation of the negative effects of removing land from Green Belt east of Wareham Road and building a large development of 95 houses.

Looking at The Developer's Indicative Plan alongside the list of facts which make this site East off Wareham Road unsuitable for development:

- it is Green Belt with no exceptional circumstances for removal
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- there would be severe infringement on privacy of residents in Glebe Road
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We conclude that the proposed development is in an unsuitable site.

We would strongly oppose any proposed increase in the number of houses on this site, which The Developer is seeking.

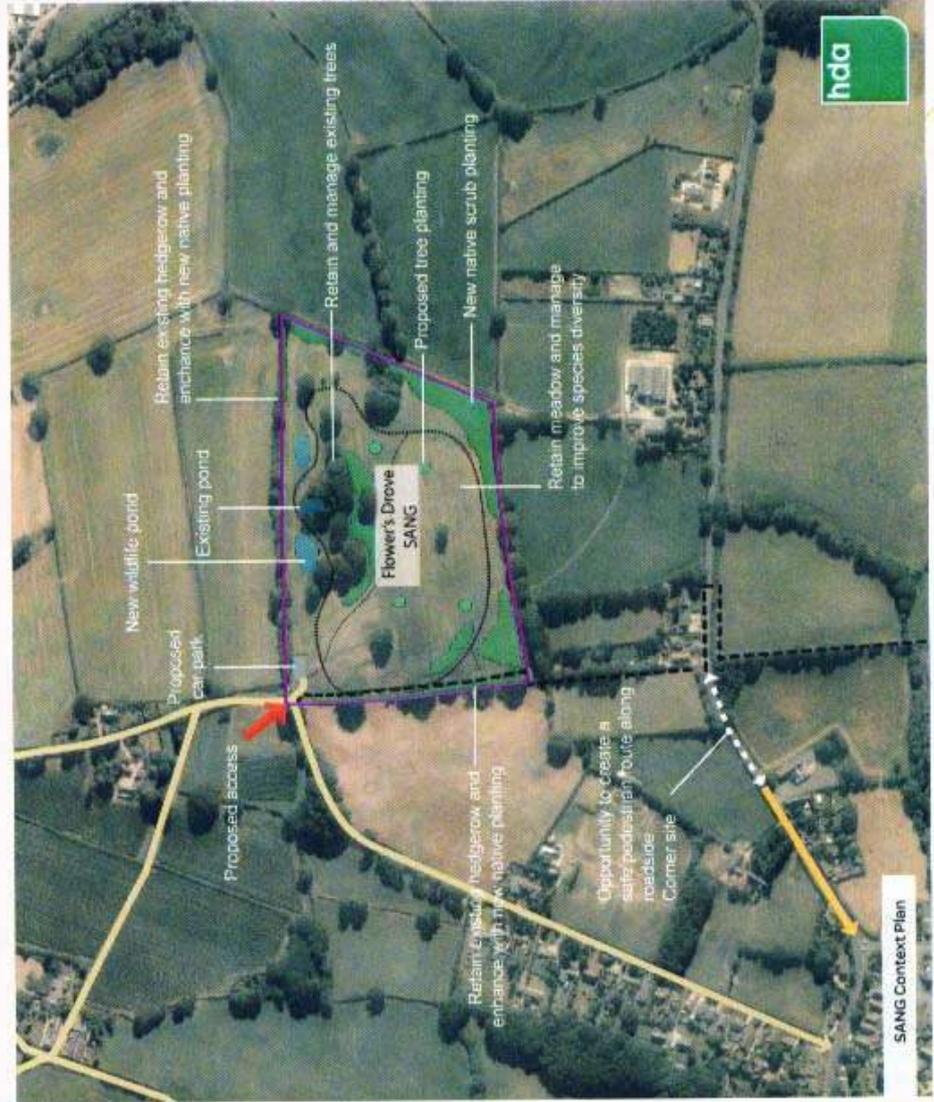
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Response to modifications SD14

1. Developers proposed SANG.

Location of SANG



Response to SD92

Baseline Assessment of Lytchett Matravers 103, 104, 105, 107, and 108

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The bus service is so limited that it is not possible to make a return bus trip to the centre of the village and back to Wareham Road (the location of a proposed development of 95 houses) within 2 hours.

There are no plans to improve the public transport in Lytchett Matravers, according to the Transport Background Paper 2018. We are amazed to see in the revised sustainability documents that Lytchett Matravers has been classified as “green” to improve access around the village.

The proposed development is outside the preferred maximum walking distance of 800m to facilities.

104: Prices of affordable houses have to be calculated in light of current house prices. Average current house prices in Lytchett Matravers are reportedly high at £386,702. Affordable house prices calculated against this figure will not actually be affordable for the people who really need to be housed; in fact the need which is driving the building of many more houses is not in actuality being addressed, if the houses are outside the price range of what people in need can afford. Furthermore, according to Lytchett Matravers Housing Survey

Needs Report 2017, only 3 households are currently registered on the Council Housing Register, as needing affordable housing.

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The Green Belt covers and surrounds Lytchett Matravers. Exceptional Circumstances for release of Green Belt land have not been proved.

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Development on Green Belt, by the Council's admission, would impact on landscape and townscape. Again there is nothing satisfactory in place, or in plan, to mitigate these negative effects.

We have personal evidence of flooding which is a significant argument against development on the site east of Wareham Road. The site is situated at the bottom of a hill and in winter water pours down the road; there was a good reason for the original settlement being placed on the higher ground.

Flood water has poured into houses on Glebe Road; many houses have been forced to personally invest in additional surface water drainage solutions to tackle this problem.

There are also known sewage problems which of course will be exacerbated by 95 more homes.

So far effective mitigation for adverse impact of a large number of houses has not been presented.

Lytchett Matravers Capacity for Growth

Total number of potential houses 3,804 (SD02)

We note that in the Addendum to Sustainability Appraisal 2019 (SD02) Lytchett Matravers capacity for growth, SHLAA/0041 (Bere Farm) for 3,557 homes is listed.

Surely if this very large development is under consideration, in the future, it is even more important to leave Green Corridors like SHLAA/0026 (Land east of Wareham Road) to provide functionally linked land for birds and other wildlife which would go towards mitigating the impact of such a large development.

107: The Purbeck Local plan says 3,804 homes would meet the housing needs of the wider area but where are the people in these homes going to work, shop and be educated?

With the 150 homes proposed for Lytchett Matravers, and the 97 new homes that have already received planning permission, the limited village facilities are and will be further stretched beyond sustainability.

108: Significant negative effects are acknowledged:

- Increased pressure on a site and surrounding area already vulnerable to flooding
- Adverse impact on Biodiversity
- Impact on pollution

Precise information on how to mitigate the above adverse impact of a large number of 95 houses East of Wareham Road has not been provided.

There will be a significant impact on pollution at any construction phase and a danger on an already busy Wareham Road with the traffic of bulldozers, diggers and lorries.

Additional traffic will be generated both during the construction and afterwards with the potential of 95 homes and increase of pollution from cars which goes against the Government's Policy on pollution.

Our Parish Council have been working closely with the Highway Authority who recognise the chronic traffic problems on Wareham Road. We are concerned that at the Hearing on Tuesday 6th August the Council stated that The Highways Authority saw no problem with traffic in or around Lytchett

Matravers; this is in direct contrast to the response given by the Highways Authority to our Parish Council.

We argue that a decrease in the number of houses if the site is considered is essential.

In conclusion, we are far from being reassured by modifications to the plan.

We have a real concern that the plan and the modifications are full of assumptions, opinions and hopes to mitigate negative impacts; the plan and the modifications are scattered with the use of the conditional tense and modal verbs “would” “could” and the only facts are the large numbers of houses the Developer wishes to build.

Our fear is that inappropriate sites, in terms of location and sustainability, will throw up problems that have not been sufficiently considered at this stage. The problems will be left with present and future residents to live with when the Developer, The Council and Natural England have walked away having made vague statements and promises to mitigate the real concerns for the Countryside and the Residents.

We believe that the plan with so many modifications is clearly unsound.

Response to SD96

Habitat Regulations Assessment refers to [Footprint Ecology's Assessment](#) (2018) stating that it provides evidence necessary to enable The Council to conclude that there are no adverse effects on International and European sites.

We note that the HRA by Footprint Ecology: Summary 4.52 states;

“This assessment is currently constrained by lack of SANG information”

The Council also state that assessment is appropriate for plan level.

We have seen this assessment and see it is only has a cursory reference to Lytchett Matravers, certainly not a detailed study. No evidence has been provided; it merely states that PDC, Natural England and the Developer are in agreement that the development is viable.

The Purbeck Local Plan indicated that a detailed habitat and flood assessment had been carried out; we have on more than one occasion, asked to see them and the request has been denied, and still is.

Ecology survey: We know that a Phase 1 species survey is currently being carried out on the SHLAA/0026 site and would like to know if this is further to the one the Developer says has already been undertaken. Our concern is that we know that there are protected species on the site. Dormice, bats and the internationally important bird species Merlin, have all been sighted in this location.

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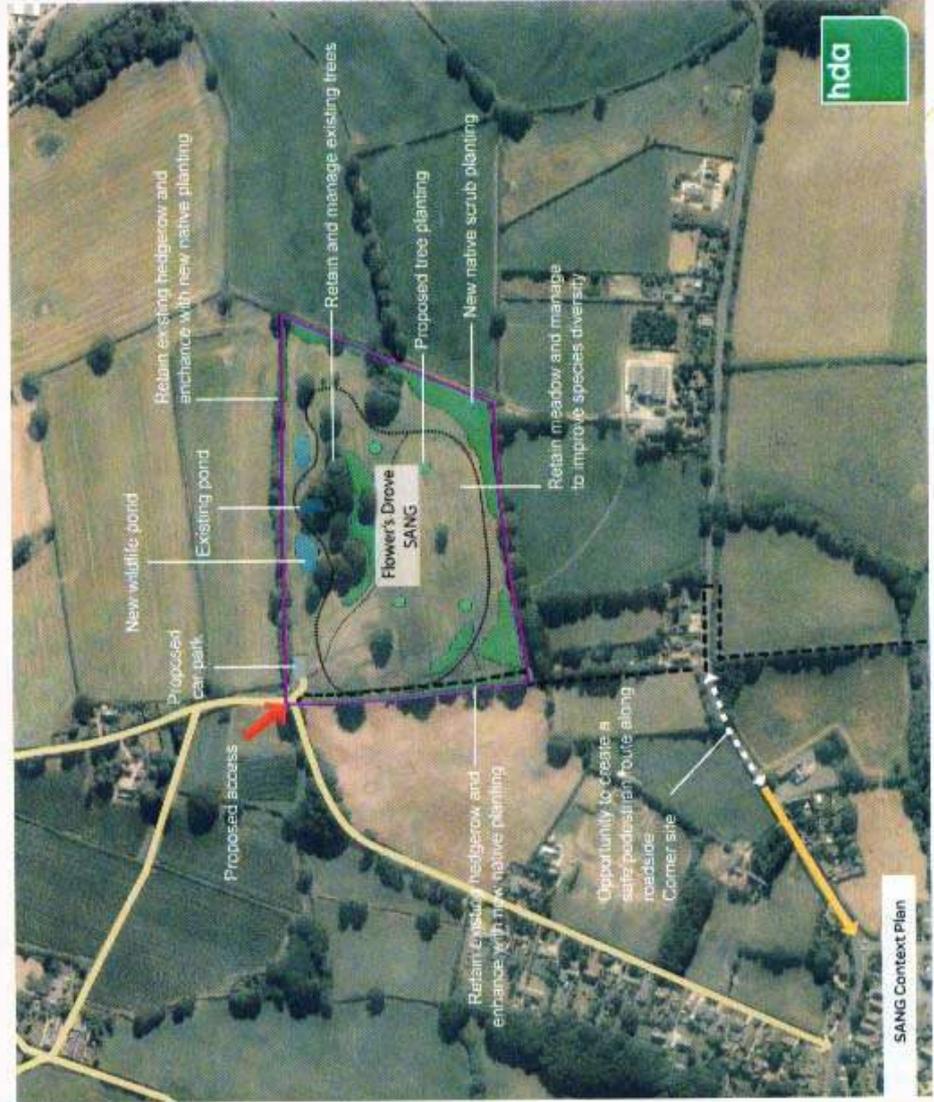
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We note that in the Addendum to Sustainability Appraisal 2019 (SD02) Lytchett Matravers capacity for growth, SHLAA/0041 (Bere Farm) for 3,557 homes is listed.

Surely if this very large development is under consideration, in the future, it is even more important to leave Green Corridors like SHLAA/0026 (Land east of Wareham Road) to provide functionally linked land for birds and other wildlife which would go towards mitigating the impact of such a large development.

107: The Purbeck Local plan says 3,804 homes would meet the housing needs of the wider area but where are the people in these homes going to work, shop and be educated?

With the 150 homes proposed for Lytchett Matravers, and the 97 new homes that have already received planning permission, the limited village facilities are and will be further stretched beyond sustainability.

108: Significant negative effects are acknowledged:

- Increased pressure on a site and surrounding area already vulnerable to flooding
- Adverse impact on Biodiversity
- Impact on pollution

Precise information on how to mitigate the above adverse impact of a large number of 95 houses East of Wareham Road has not been provided.

There will be a significant impact on pollution at any construction phase and a danger on an already busy Wareham Road with the traffic of bulldozers, diggers and lorries.

Additional traffic will be generated both during the construction and afterwards with the potential of 95 homes and increase of pollution from cars which goes against the Government's Policy on pollution.

Our Parish Council have been working closely with the Highway Authority who recognise the chronic traffic problems on Wareham Road. We are concerned that at the Hearing on Tuesday 6th August the Council stated that The Highways Authority saw no problem with traffic in or around Lytchett

Matravers; this is in direct contrast to the response given by the Highways Authority to our Parish Council.

We argue that a decrease in the number of houses if the site is considered is essential.

In conclusion, we are far from being reassured by modifications to the plan.

We have a real concern that the plan and the modifications are full of assumptions, opinions and hopes to mitigate negative impacts; the plan and the modifications are scattered with the use of the conditional tense and modal verbs “would” “could” and the only facts are the large numbers of houses the Developer wishes to build.

Our fear is that inappropriate sites, in terms of location and sustainability, will throw up problems that have not been sufficiently considered at this stage. The problems will be left with present and future residents to live with when the Developer, The Council and Natural England have walked away having made vague statements and promises to mitigate the real concerns for the Countryside and the Residents.

We believe that the plan with so many modifications is clearly unsound.

Response to SD96

Habitat Regulations Assessment refers to [Footprint Ecology's Assessment](#) (2018) stating that it provides evidence necessary to enable The Council to conclude that there are no adverse effects on International and European sites.

We note that the HRA by Footprint Ecology: Summary 4.52 states;

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The Council also state that assessment is appropriate for plan level.

We have seen this assessment and see it is only has a cursory reference to Lytchett Matravers, certainly not a detailed study. No evidence has been provided; it merely states that PDC, Natural England and the Developer are in agreement that the development is viable.

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Response to amendments to Purbeck Local Plan

Consultees 1191476, 1191015, **1190535**

Statement on Amendments

This statement is made on behalf of 61 residents in Glebe Road Lytchett Matravers who strongly oppose the proposed development of 95 houses n Green Belt Land on the site east of Wareham Road Lytchett Matravers (SHLAA/0026)

Introduction:

We submitted our original statement on Matters A, C and E and were invited to speak on Matter E Housing Allocation at the Examiner's Hearing on 6th August which we did.

We were not, however, invited to attend Matter C Issue 1 Green Belt so we wish to state our view here:

"The suggestion that the land east of Wareham Road should be released from the Green Belt is unsound since "exceptional circumstances" do not exist"

Furthermore the number of amendments produced suggest that the Proposed Plan should perhaps not have been approved for submission.

"Sound planning requires effective consultation with those affected": in our experience the techniques adopted by The Purbeck Local Council for the "alleged" consultation have not been effective and obviously render the proposed plan unsound.

We asked for evidence and documents referred to in the plan eg Flood Assessment, Habitat Studies, and Traffic Assessment by Highways Authority none of which were provided.

Response to SD 14

MM30 (Matter A, Issue 6 Q2 July 2019. The Council's response to Action 8SD84

H6 is a strategic policy and therefore conflict should be avoided between the Council's Local Plan and Neighbourhood Development Plan.

The Purbeck Local Plan contradicts the aims of the Lytchett Matravers Neighbourhood plan which has already been adopted; our Neighbourhood Plan aims "to maintain the quiet surrounding roads with minimal increase in traffic" and "to maintain the rural character of the village away from the conurbation".

MM1 (Council's response to Action 21, 23 and 24 SD84) Policy V1

The Council states that there will be specialised purpose built accommodation at Lytchett Matravers to cater for Purbeck's aging population. Refer to our response to Action 2, which lists the facts about the limited amenities for residents in terms of transport and grocery shopping. Older people, no longer driving, would not be catered for on the site east of Wareham Road, so distant from the centre of the village (one mile away) and lacking regular, efficient public transport; it would be impossible for the elderly to attend hospital appointments in Poole if they were depending on public transport. Neither would they be able to make a return journey from the doctor's surgery or pharmacist, within 2 hours of leaving, given the very limited one way bus service.

MM2 Policy V2

This policy states that "Green Belt boundaries have been amended at Lytchett Matravers to support sustainable development" while at the same time, significant factors which also support sustainability are lacking, like efficient public transport, shopping facilities and employment; these are being swept aside but remain a huge problem to sustainability. It is a Catch 22 situation because the people will, in the absence of efficient public transport and ability to shop locally, use their cars if they own one, and thus add to the problem of pollution which goes against the Government's Environmental policy. Add to

this the increased twice daily journey of people driving to work, as there is no employment in the village, and the CO2 emissions will increase exponentially.

Policy V2

Policy V2 has been modified to include the word “must” in the sentence “must be offset with the creation of a SANG at Lytchett Matravers.” The SANG proposed for Lytchett Matravers is too far away from the larger of the 3 proposed developments, the land east of Wareham Road. It is not suitable in terms of its position and therefore will not offset the impact of removing land from Green Belt.

The development SHLAA/0026 is clearly within the 5km mitigation zone of European sites (HRA map 6, p28 with further details on p32), hence development needs to be mitigated by appropriate provision. The proposed SANG put forward is clearly inappropriate.

There will be an increased pressure on Wareham Forest and Heathland as new residents at the south side of the village, will, as current residents do, choose to go to the more convenient and beautiful places thus increasing pressure on Heathlands with the additional footfall of people and their pets.

Either the SANG or the development is planned for the wrong place. The SANG indicated in the plan is neither strategic, nor suitable in location to attract the residents from this large proposed housing development, yet it is being put forward as a “cure all” for the negative effect of removing land from Green Belt and replacing that land with 95 houses.

MM26 (Matter H Issue 1, Question 4) Policy I1b states that any site that may come forward for around 50 homes, would need to provide an on-site SANG. The proposed development east of Wareham Road is for 95 houses and the one SANG proposed is not on-site, but at the opposite end of the village (see appendix 1) and is 3 Km away (the Developer erroneously states 1.7 Km). The Council and Natural England seem to be approving The Developer’s one SANG for all 150 proposed new houses instead of 3, one of which, by the Council’s own admission should be on a site with 50 plus houses; by their own calculations there should be the equivalent of 2 SANGs on the site east of Wareham Road and instead there are none; the Developer’s Indicative Plan shows a small pond near the already existing woodland to the east of the site, but they also show large houses on this small area, so they are not intending to provide alternative green space to mitigate the effect of removing land from

Green Belt and replacing it with a large housing development. Initially the need for two SANGs was put forward by Natural England but this number has disappeared from the plan without any reason given. The fact that 150 new houses are being proposed for Lytchett Matravers should mean planning for 3 SANGs, one for each of the 50 houses.

Policy V2

It is alarming to see a paragraph about “Spread” and “Safeguarding the Countryside from encroachment” being removed from the plan.

In The NPPF – Protecting Green Belt Land Paragraph 134

(a) states the purpose of Green Belt is: “to check the unrestricted sprawl of built up areas”

(c) “To assist in safeguarding the countryside from encroachment”

The Council and Natural England’s job, if not landowners’ job, is surely to be mindful of safeguarding the Countryside from encroachment. Again it is alarming to see the phrase about “adverse ecological impact” being removed from policy E3d. Can the Council justify this?

MM3 (PLPP 437) Policy E5

Sustainability Drainage

Policy Paragraph E risks – “the characteristics (including risks from flooding, water table and surface features of land) of the site and its surroundings, should be taken into consideration and the opportunities to reduce the impact of flooding on the site should be taken”.

The Indicative Plan for SHLAA26 which the Developer has put forward does not show that they have taken the opportunity or given importance to planting trees to mitigate the known flooding problems.

MM46 (Council’s response to Action 13 SD 84)

Chapter4 Housing, Policy H1

The identified housing needs across the whole district is 180 homes per year. Lytchett Matravers, with very limited infrastructure is being put forward for 150 houses, nearly one year's supply of houses (over the 15 years of the plan).

This seems a disproportionate number of houses given the village's limitations in transport and facilities, also in light of the fact that 97 additional homes for the village have already received planning consent, are in construction or are likely to be built in the next 5 years.

MM48 (Council's response to Action 5 and 11 SD 84)

Policy H3 clause refers to the SANG as possibly mitigating the effect of new homes allocated at sites in Lytchett Matravers. The Lytchett Matravers site, it acknowledges, is likely to have a significant effect on Poole Harbour through increased recreational activities. We cannot see how the effects of this increase in recreational activity are going to be mitigated, even slightly, by one SANG of unsuitable size for 150 houses, in an unsuitable location to attract people to use it frequently for dog walking or other recreational activities. As it stands it would not mitigate the negative effects on Poole Harbour and the nearby Heathlands.

MM50 Council's response to Action 24 SD84.

This response refers to "the most suitable locations" being at "key service villages". Again we would urge the need to look again at the unsuitability of Lytchett Matravers in terms of transport and basic facilities for such a large number of houses. Surely each "key service" village should be considered separately in the light of its current facilities, in particular transport.

MM 15 Policy 13

(PLPP664

Green Infrastructure trees and hedgerows.

This additional clause in policy 13 is welcome but the logic of removing the important Green corridor, which is the land east of Wareham Road, and then having a policy to replace such a corridor, the trees and hedgerows which will be lost, seems an irrational contradiction. Parcel 25 was classified as having greater importance to Green Belt than any other parcel of Green Belt land around the village.

There is Green Belt available for sale nearer the village centre which could be adopted for development as a priority over the more contentious site east of Wareham Road (SHLAA26); this other parcel of land does not serve as a corridor for the abundant wildlife and natural habitat as does SHLAA26 with its adjoining woodland to the east. It seems to us that the land to the east of Wareham Road is being pushed forward because of the landowner's pressure to sell.

In conclusion, throughout the modifications in SD14 there is repeated reference to SANGs mitigating the impact of the damaging effect on habitat, Heathland and Poole Harbour; as the first letter of this acronym is S, we assume the emphasis is on suitability. The SANG proposed for the village of Lytchett Matravers is entirely unsuitable for sustainability and mitigation of the negative effects of removing land from Green Belt east of Wareham Road and building a large development of 95 houses.

Looking at The Developer's Indicative Plan alongside the list of facts which make this site East off Wareham Road unsuitable for development:

- it is Green Belt with no exceptional circumstances for removal
- it is inconveniently distant from from the village with its already limited services
- it has very limited public transport
- there are flooding problems
- there would be severe infringement on privacy of residents in Glebe Road
- the unsuitable positioning of the SANG

We conclude that the proposed development is in an unsuitable site.

We would strongly oppose any proposed increase in the number of houses on this site, which The Developer is seeking.

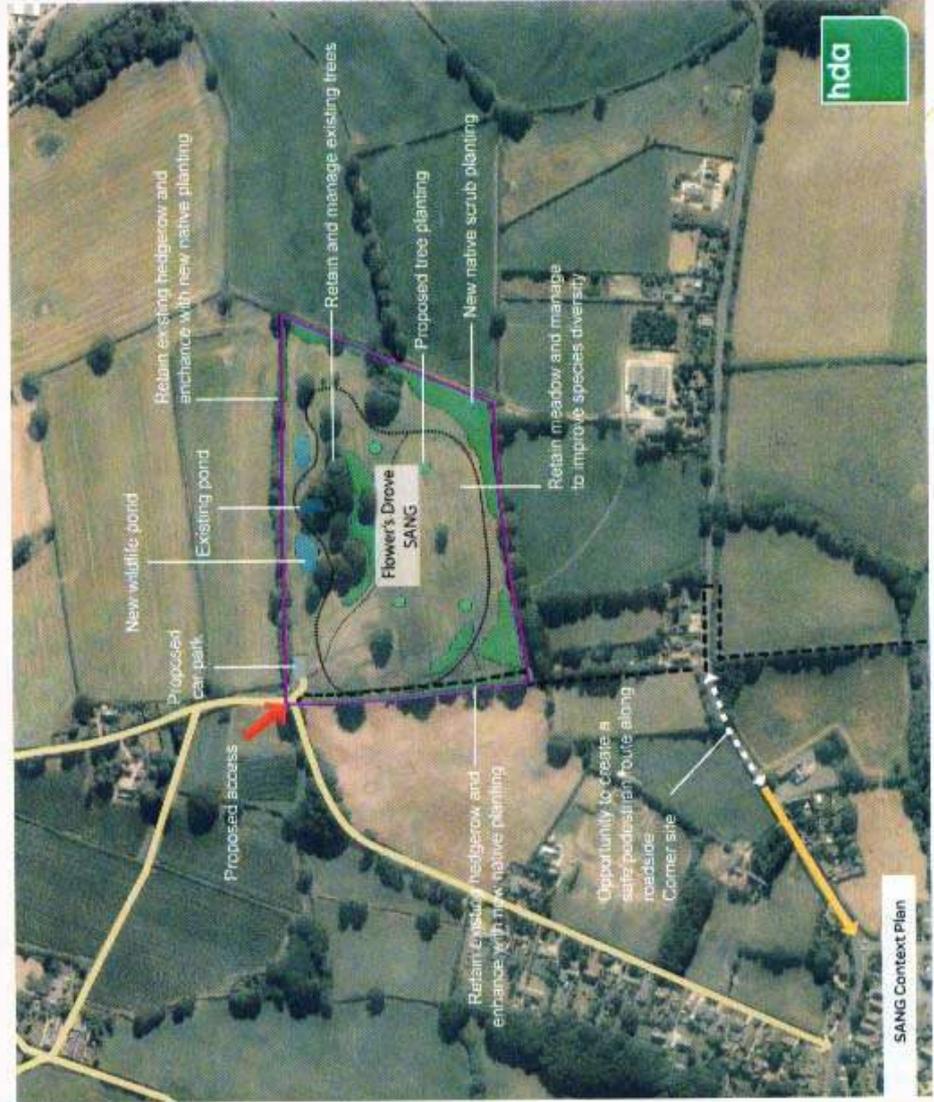
We request that the wording of "up to" 95 houses is not changed to "at least" which the Developer is seeking.

Appendix 1

Response to modifications SD14

1. Developers proposed SANG.

Location of SANG



Response to SD92

Baseline Assessment of Lytchett Matravers 103, 104, 105, 107, and 108

103: The definition of Key Service villages are defined as large villages with a good level of services:

A good level of services includes

- Local Employment
- Convenient Shopping Facilities
- Frequent Public Transport

Lytchett Matravers does not satisfy the above criteria. The village does not have local employment or frequent transport and the only shopping facility is a small Tesco express with limited choice; it is very expensive in comparison to supermarkets and does not satisfy the requirements of a family weekly grocery shopping. People without their own transport and inefficient public transport fall into the well-researched problem of “the poverty trap”, having to pay higher prices because their affordable houses have not been located near adequate facilities.

The bus service is so limited that it is not possible to make a return bus trip to the centre of the village and back to Wareham Road (the location of a proposed development of 95 houses) within 2 hours.

There are no plans to improve the public transport in Lytchett Matravers, according to the Transport Background Paper 2018. We are amazed to see in the revised sustainability documents that Lytchett Matravers has been classified as “green” to improve access around the village.

The proposed development is outside the preferred maximum walking distance of 800m to facilities.

104: Prices of affordable houses have to be calculated in light of current house prices. Average current house prices in Lytchett Matravers are reportedly high at £386,702. Affordable house prices calculated against this figure will not actually be affordable for the people who really need to be housed; in fact the need which is driving the building of many more houses is not in actuality being addressed, if the houses are outside the price range of what people in need can afford. Furthermore, according to Lytchett Matravers Housing Survey

Needs Report 2017, only 3 households are currently registered on the Council Housing Register, as needing affordable housing.

It is hard to prevent or monitor the buying of such houses for second homes.

105: There is no evidence that the impact on Biodiversity will be mitigated.

The Green Belt covers and surrounds Lytchett Matravers. Exceptional Circumstances for release of Green Belt land have not been proved.

We ask again, as we have not had clarification, what are these exceptional circumstances to remove land from Green Belt east of Wareham Road, and have these exceptional circumstances been proved and tested with regard to this site?

Development on Green Belt, by the Council's admission, would impact on landscape and townscape. Again there is nothing satisfactory in place, or in plan, to mitigate these negative effects.

We have personal evidence of flooding which is a significant argument against development on the site east of Wareham Road. The site is situated at the bottom of a hill and in winter water pours down the road; there was a good reason for the original settlement being placed on the higher ground.

Flood water has poured into houses on Glebe Road; many houses have been forced to personally invest in additional surface water drainage solutions to tackle this problem.

There are also known sewage problems which of course will be exacerbated by 95 more homes.

So far effective mitigation for adverse impact of a large number of houses has not been presented.

Lytchett Matravers Capacity for Growth

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Subject: Purbeck Local Plan Examination – additional comments
From: Mark Harris on behalf of Bellway Homes and A & F Baggs
Date: 9th September 2019



SD85 – MEETING HOUSING NEED

- 1.1 Document SD85 responds to the Inspector's request that the Local Planning Authority (LPA) should give consideration to the implications for the spatial strategy of housing numbers increasing either as a result of the application of the standard method in nation planning guidance or other circumstances which suggest a higher housing need figure is necessary.
- a) Meeting the Housing Need Figure from the Standard Method (Capped and Uncapped)**
- 1.2 At paragraph 3.1 the LPA indicate that total supply over the plan period has been revisited and land for 3,062 dwellings has been identified. This supply has initially been compared to a revised housing requirement based on application of the standard method (both capped and uncapped). The Council's assessment shows that the revised supply is 182/102 homes above the potentially revised minimum housing requirements of 2,880/2,960 dwellings.
- 1.3 The matter of supply is further addressed in documents SD86 and SD87 and will also need to be discussed at a revised hearing session in October. However, a number of points on land supply and deliverability of sites are also relevant to the implications of an increased housing requirement on the spatial strategy.
- 1.4 Notwithstanding any specific comments that we may have on land supply, the surpluses of 102/182 dwellings on the supply side, equate to a contingency between 3 and 6% over the revised requirements. On the simple basis their supply is greater than the requirement, the Council consider that there is sufficient supply already delivered by the Plan, so to increase the requirement to 180 or 185 homes per year would not have any impact on the spatial strategy (paragraphs 3.2 and 4.2 of SD85).
- 1.5 However, as is set out in our Matter E statement (see paragraphs 1.30 to 1.33) this level of buffer/contingency is insufficient particularly when the nature of the supply is considered.
- 1.6 The Council are reliant on what are for the District 'strategic' scale sites. There are several sites, including Moreton Station, where there are significant challenges to overcome to allow delivery. There is also significant uncertainty as to the deliverability of the number of homes expected to come forward on small sites across the District.
- 1.7 If just one of these sites were to slip or there was any under delivery on small sites, it would cause the Council to be in a position where they will not be able to deliver their minimum housing requirement within the plan period, and potentially mean that they are unable to demonstrate a deliverable five-year land supply is in place.
- 1.8 Therefore, if the Inspector were to conclude that a housing requirement of 180 or 185 dwellings per year were appropriate, we would suggest that there should be a buffer/contingency of at least 10% but more realistically 20% on the supply side to ensure delivery. This would set out the following housing land supply requirements:

Updated Local Need figure (dpa)	Revised housing provision figure (2018-2034)	Land supply with 10% contingency	Land supply with 20% contingency	Council's revised supply	Shortfall against requirement + contingency (10/20%)
180	2,880	3,168	3,456	3,062	106/394
185	2,960	3,256	3,552	3,062	194/490

1.9 Therefore, if it is accepted by the Inspector that a contingency in supply is required to ensure delivery, which we are finding is common place as good practice in other Authority areas, the implication of increasing the housing requirement even to 180 or 185 dwellings per year is that there is a shortfall in land supply that should be addressed through the identification of additional sites, in sustainable locations, for allocation in the Local Plan.

b) Possible Higher Levels of Housing Need

- 1.10 Section 5 of SD85 considers the implications of greater increases in the housing requirement – either to 200 dwellings per year to reflect economic growth aspirations or to 228 dwellings per year to meet unmet need for elsewhere. At paragraph 5.5, the Council acknowledge that either of these scenarios would have implications for the spatial strategy as there would be a shortfall in land supply.
- 1.11 Whilst the Council question the justification for the positions put forward by participants (see later point), it goes on to consider the options for meeting an increased level housing number through the identification of additional sites in section 8.
- 1.12 In sections 8-10, the Council effectively state that if the Inspector concludes that the housing required should increase to 200/228 dwellings per year, no changes will be proposed to the spatial strategy and any additional allocations will be deferred to the emerging Dorset Plan, effectively meaning the full housing need will in the District will not be planned for.
- 1.13 We don't believe that this is acceptable in the context of the availability of suitable sites in the District which have not been given due consideration.
- 1.14 Specifically, in relation to the option of allocating land West of Wareham to meet the shortfall, a very defensive stance is adopted by the Council (see paragraphs 8.11 - 8.12). The conclusions effectively suggest that the site should be considered alongside other sites outside the District through the Dorset plan review.
- 1.15 We do not consider this to be an acceptable conclusion as the Local Plan should be looking to meet the areas full housing requirement and the Council should fully consider all options in detail – whether constrained or not. In our Matter D Statement, we reiterate that we believe there are exceptional circumstances to justify consideration of sites in the AONB for development and, in a scenario where increased site allocations need to be made, such sites should be considered in more detail through the preparation of the current Local Plan.

c) Concern about the Possible Increases in the Housing Need Figure

- 1.16 In terms of the Council questioning the justification for the potential housing requirements, we would particularly like to comment on the observation that there is no justification for increasing housing need to meet local economic aspirations (paragraphs 6.7 - 6.10). The Council claim that the innovation park draws in labour from

outside the district and that the higher than normal in-commuting figures are as a result of the specialist skills required.

- 1.17 Whilst this may partly be the case, the approach of the Council is effectively exacerbating unsustainable patterns of development by not seeking to strike a balance between jobs and homes and not creating opportunities for people to live in the District they work.
- 1.18 By not planning for additional homes within Purbeck to reflect economic growth, the Council are a) not providing opportunities for employees to live close to areas where they may be employed and b) potentially driving up prices for existing residents due to increasing competition for those houses on the market. Increasing the housing requirement to better reflect the balance between jobs and homes would therefore lead to a more sustainable plan and be to the benefit of both existing and future residents.

d) The Distribution of Growth

- 1.19 Section 7 clarifies the distribution of development across the settlement hierarchy. This shows that just 20% of planned growth is directed to the 'towns', which the Council acknowledge at paragraph 7.4 are the most sustainable locations for growth. Paragraph 7.5 states that the limited nature of the growth is due to the constrained nature of the land around the towns.
- 1.20 We would take this opportunity to reiterate that despite acknowledging that the towns are the most sustainable locations for growth, at no point has the Council considered the three strands of sustainability together in assessing the potential for growth at the towns, specifically Wareham. Whilst we acknowledge that environmental considerations should be given significant weight in plan making, it is important that these constraints are viewed in the context of the wider social and economic benefits that growth around towns can bring to the area – which are also significant.
- 1.21 In almost all of the examples listed in the Council's AONB Background Paper (SD70), the need to sustainably locate development has resulted in development sites being identified in AONB. However, in Purbeck, despite acknowledging the towns are sustainable locations for growth, the AONB around them is seen as an absolute constraint to development by the Council. We would point the Inspector to the AONB Background Paper, which demonstrates how other authorities have addressed the issue of planning for development in constrained areas, the majority of which are fundamentally different to the approach in Purbeck, and the Council's conclusion at paragraph 101 that AONB is not an absolute constraint to development.
- 1.22 If the Council followed the approach of other Authorities, in the event of more land needing to be identified, sites in the AONB would be subject to more detailed assessment and potentially identified as suitable locations for development.

SD86 – REVIEW OF SOURCES OF LAND SUPPLY

- 1.1 The Council has prepared a report (SD86) to summarise the supply of suitable housing land to meet local housing need. We have commented below on elements of this report as they relate to land at Wareham, the role of the Wareham Neighbourhood Plan, and the role of windfall in delivering homes to meet need in the District.
- a) Revisions to the Housing Supply from the Wareham Neighbourhood Plan**
- 1.2 As was raised at the Matter D hearing session, we have concerns with the fact that the Neighbourhood Plan appears to be driving the level of housing to be planned for in Wareham, rather than the Local Plan, as the strategic document, setting the strategy.
- 1.3 This is emphasised by SD86 which confirms that the number of homes proposed in the Local Plan directed to Wareham is to drop from 300 to 295 dwellings, as a result of an increased capacity at the Middle School site and subsequent exclusion of the Westminster Road site in the Neighbourhood Plan.
- 1.4 SD86, Table 3, includes a supply of 90 units on the Former Middle School site. This has been increased by 55 homes from 35 units. Strangely, this change to the Neighbourhood Plan has been made post submission of the Plan, which is currently being examined, without consultation.
- 1.5 Whilst consideration of whether the Neighbourhood Plan meets the basic conditions is outside the remit of the Local Plan examination, whether the approach followed by the Town Council in preparing the Neighbourhood Plan is robust or not is relevant given the Local Plan is wholly reliant on the adoption of the Neighbourhood Plan to meet the housing need attributed to Wareham.
- 1.6 In this regard, we have concern that an assumption is being made in the Neighbourhood Plan (and therefore in the Local Plan) that 90 homes can be accommodated on the Middle School site. A variety of potential plans for the site, which also includes the Hospital / Health Centre Site (H8), which has a separated stated capacity of 40 units in table 3 despite all the consultation plans showing the site as accommodating 32 dwellings, were published at a series of public consultations between 7th and 21st August 2019 (see <https://www.dorsetcouncil.gov.uk/care-and-support-for-adults/building-better-lives/building-better-lives-wareham-scheme.aspx>). These show:
- Option 1: 72 homes
 - Option 1b: 69 bed nursing carehome + 20 homes
 - Option 2: 72 homes in Option 1 + 32 homes on Wareham Recreation ground
- 1.7 None of the above options are consistent with the 90 units in SD86, Table 3. If the only the lower allocation of 20 dwellings were to be delivered (taking into account discussion at the Matter D session as to whether care facilities are in addition to housing numbers or part of), this could leave a significant shortfall in housing provision in Wareham.

1.8 90 homes appears to be an excessive capacity. It represents a density of over 50 dwellings per hectare, which is excessively high given the location and the nature of the surroundings. Therefore, there has to be uncertainty as to whether 90 homes are actually realistic for the site.

1.9 In addition, the consultation plans refer to units that are a 'mix of 1 and 2 bedroom'. It is therefore assumed that were 90 units to be accommodated, these would also be a mix of 1 and 2 bed properties.

1.10 When considered alongside the Former Gasworks site (H7) (10 units), which is spatially constrained, and the Health Centre site (H8) which is also high density, the three sites equate to 140 of the 185 units planned in Wareham, or 76% of the proposed allocations. Therefore, the proposed allocations shown in Table 3 of document SD86 fail to address the acute shortage of suitable family homes in the Wareham area, and are not consistent with the Vision published in the Purbeck Local Plan Pre-Submission Draft 2018-2034, which states:

An appropriate mix of housing sizes and tenures will be provided. Priority will be given to delivering housing which meets local needs first to create balanced, mixed and well integrated communities – including supported housing for the elderly and other groups with special needs.

1.11 Overall, we do not consider that the sites proposed for allocation in Wareham are either capable of delivering the level of housing expected, nor will they deliver the mix of housing required in the local area, which would be better accommodated on larger, strategic sites, which enable a more suitable mix of housing in a less condensed area, thus enabling the 'Vision' of the plan to be achieved.

b) Windfall

1.12 The Council are proposing an increase in the level of windfall within the land supply assessment. This is based on looking solely at windfall over the last 5 years, rather than a longer period as was previously the case, and not applying a discount. The effect is to alter the assumed windfall completion rate from 46 to 62.2 dwellings per year, a 36% increase.

1.13 This change exacerbates the concerns raised in our Matter E statement which questioned the over reliance on windfall to meet the housing requirement.

1.14 The NPPF (paragraph 70) states:

Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

1.15 The Council's approach is purely based on trends looking backwards. At no point is there an assessment of the nature of past supply and whether there is compelling evidence that the type of windfall over the last five years will still come forward in the future. We would have expected more detailed analysis of past supply and opportunities for future delivery to justify the inclusion of the windfall rate, which forms a fundamental part of the supply.

1.16 Without such justification, the windfall allowance is not robust and the Plan is unsound as the strategy is not properly justified.

SD92 – SUSTAINABILITY APPRAISAL ADDENDUM

- 1.1 The Council have prepared a Sustainability Appraisal Addendum to assess the baseline data and potential for growth in the towns and Key Service Villages. The Addendum states that it should be read alongside the other sustainability appraisal reports produced throughout the process of preparing the Local Plan.
- 1.2 We have a number of detailed points on the Addendum, which highlight fundamental flaws in the conclusions of the Council. These particularly relate to the justification, or lack of, for a number of the allocations in the Local Plan and the lack of further consideration of growth at the main towns.

a) The Story of the Sustainability Appraisal

- 1.3 The Addendum outlines the first stage of the SA process as SD69 which assessed the sustainability of various strategy options and potential large housing sites.
- 1.4 Importantly, this assessment gave the first indication that the strategy now proposed (in part) was not the most sustainable option. Below are extracts from SD69 showing a) the assessment of possible location for settlement extensions and b) the specific assessment of individual sites. For both we have focused on options for Wareham and Moreton Station, which we have referred to in our previous statements.

2015 – a) Where should the Council focus settlement extensions:

3b	disperse settlement extensions around the towns (Swanage, Upton and Wareham)	++	u	+	++	n	n	n	-
3e	disperse settlement extensions around other villages with a settlement boundary (Briantspuddle, Chaldon Herring, Church Knowle, East Burton, East Lulworth, Harmans Cross, Kimmeridge, Kingston, Lytchett Minster, Moreton Station, Studland, Ridge and Worth Matravers)	++	u	+	--	n	n	n	--

2015 – b) Potential Large Housing Sites

4b	consider new development to the west of Wareham	++	u	+	++	n	n	-	-
4e	consider new development around Moreton Station (including Redbridge Pit)	++	u	+	-	n	-	n	--

- 1.5 It is clear from the early SA process that there are significant negative effects of focusing settlement extensions in lower order settlements including Moreton Station, and significantly more positive benefits of focusing growth on the towns, including Wareham.
- 1.6 It is also clear that development West of Wareham is assessed as being significantly more sustainable than the option of developing at Morton Station.
- 1.7 Refined options were then considered in 2016 (SD52) which looked at a number of strategies and sites in more detail. The summary table on page 181 of the Assessment shows the assessment of the potential strategic sites. Again, this shows that land at Wareham is more sustainable than development at Moreton Station and highlights negative issues with access to services and facilities for development in Moreton Station. For clarity, the column headed 'Wareham' refers to land West of Wareham (see page 155 of SD52) and the column headed 'Moreton' is land at Moreton Station.
- 1.8 Paragraph 32 of the NPPF states that:
Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). Our emphasis underlined.
- 1.9 In this context, as is discussed further below, this early SA work should have informed the strategy of the Council. However, they have chosen to follow a strategy which largely ignores negative economic and social issue impacts. The location of Moreton Station in the most isolated west of the district cannot be overcome through mitigation, and it is our view that alternatives should have been given more consideration as part of the process.

Figure 1: 2016 - Summary of Site Assessments

	Wool			Lytchett Minster			Wareham			North Wareham			Moreton			Lytchett Matravers			Upton			Langton Matravers			Harmans Cross		
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Meet as much of Purbeck's housing need as possible.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Promote services and facilities where need is identified.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Harness the economic potential of tourism and widen employment opportunities in Purbeck.	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green
Help everyone access basic services, reduce the need to travel by car & encourage cycling, walking and use of public transport.	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Reduce vulnerability to flooding and coastal change, and adapt to climatic changes.	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Protect & enhance habitats and species and local geo-diversity.	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Protect & enhance Purbeck's unique landscape & townscape, & cultural & historical assets.	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Minimise all forms of pollution and consumption of natural resources.	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red

- 1.10 At paragraph 14 of the Addendum the Council state.
'Most of the assessments identified overall significant positive effects. Minor negative effects were recognised over long term periods relating to increased pollution generated from the new houses'.
- 1.11 This statement is clearly incorrect and misleading as the assessment clearly shows that there are numerous negative effects associated with development in locations which are now proposed for allocation, including at Moreton Station. What is particularly concerning is that the assessment highlights the negative impact development in this location would have on access to services and facilities — yet the option has made it through all the assessment work to be a proposed Local Plan allocation.
- 1.12 The conclusion of the Council at paragraph 14 of the Addendum also fails to recognise the significant sustainability benefits of developing west of Wareham, which was the best scoring sites in the process.
- 1.13 The Addendum at paragraph 15 goes on to say that the SA work from 2018:
'...took into account National Policy... and due to the protection afforded to green belt and AONB in the NPPF, releasing large amounts for housing was no longer considered a reasonable alternative'.
- 1.14 For clarity, the preparation of the Local Plan commenced after the NPPF was published in 2012 meaning protection for AONB would have been a consideration in the early SA work as the NPPF (2012) at paragraph 115 states that 'great weight' should be given the conserving AONB.
- 1.15 This is the same wording as at para 172 of the NPPF (2019), with the only addition being to state that development in AONBs should be limited (with the definition of limited being undefined - meaning one large site could be considered to be limited). It is therefore unclear how the publication of the NPPF in 2018 has altered what are considered to be reasonable alternatives for the purpose of consideration in the SA.
- b) What did the final assessment demonstrate and how did it inform the strategy?**
- 1.16 The Addendum states at paragraph 17 that the October 2018 SA concluded no likely significant affects on any of the proposed policies of allocations. Given the previous assessments outlined above, it is unclear how this can be the case.
- 1.17 It is clear from the Council's own SA work that there is a fundamental issue with access to services and facilities when looking at settlement extensions around lower order settlements – this is a locational issue which cannot be resolved through the allocation of c.500 unit sites which will not, and cannot, deliver the services and facilities needed to make development in locations such as at Moreton Station sustainable.
- 1.18 Indeed, in the case of Moreton Station, as indicated in our response to Matter E (section 1.4), it is currently classified under Policy LD of the existing local plan under 'Other Villages with a Settlement Boundary', rather than a 'Key Service Village' as stated in the proposed local plan and sustainability assessments.
- 1.19 This conclusion therefore indicates that the Council's latest SA work is inaccurate and as raised at an earlier hearing session, effectively 'fixed' to justify a strategy which has been led by the desire to avoid making any difficult decisions regarding green belt release and/or development in the AONB, and the desire of the public to see dispersed growth, rather than pursuing growth in sustainable locations. This is effectively confirmed by the overview of the Housing Strategy provide at paragraphs 18 to 23 of the Addendum.
- c) Housing sites**
- 1.20 Paragraph 26 of the Addendum refers to the location of land West of Wareham stating that it was taken out due to its impact on the AONB. We have already set out our position on this in our previous statements, which we

won't reiterate here. However, the Addendum also refers to the site being separated from the Town of Wareham which affects the sustainability of the site.

- 1.21 The location of the site has not changed from that assessed in 2015, where access to service and facilities of the site was scored as a double positive. The site is to the west of the A351 but is linked by an existing footpath, with cycle path improvements currently under construction on the A351, which could further improve the sustainable connectivity of the site. There is plenty of scope for enhancements to these connections which would be agreed through the development of detailed proposals at application stage. At no point is this considered as part of the assessment, as is confirmed can be the case in paragraph 32 of the NPPF (2019), nor is it justification for ruling the site out of consideration on sustainability grounds.
- 1.22 This is one example of the inconsistency of the SA work undertaken by the Council – counting the location of a site across a road from a main town as unsustainable, whilst considering a major allocation with no key facilities in the vicinity and no bus service as being sustainable. This point is covered in more detail below.

d) Social Baseline

- 1.23 As noted above, the Social Baseline highlights a number of issues with the Council's approach. It identifies that Moreton Station, whilst being in an environmentally unconstrained area, has:
- A population of just 389 – the smallest settlement assessed;
 - The lowest level of services and facilities (with no retail, hospitality or financial services);
 - No bus service;
 - Highest dependency on the car;
 - Second lowest house prices (viability?); and
 - Very low demand on the housing register.
- 1.24 Despite this baseline position, which clearly highlights that Moreton Station is the one of the least, if not the least, sustainable of all the settlements assessed in the District, the Council consider it an appropriate location for substantial growth. The only benefit the area has is that it is environmentally unconstrained, and this appears to have outweighed, incorrectly in our view, any other sustainability considerations.
- 1.25 Whilst there is a summary of the Social Baseline, at no point does this set out which areas are the most sustainable – or the least sustainable. If it did, it would clearly demonstrate that Moreton Station is an inappropriate location for growth, as indicated by the earlier SA work mentioned above.

e) Assessment for growth

- 1.26 From page 17 of the Addendum, an assessment of the likely impact of certain levels of growth on each settlement has been undertaken. Whilst this is subtly different to previous assessments which assessed the sustainability of proposals, a number of comparisons can be made with previous assessments and also with the conclusions of the Council.
- 1.27 Whilst the assessment is helpful to set out the impacts of the proposed level of growth on each settlement, this is only beneficial if the approach taken is consistent.
- 1.28 The Council appear to have concluded that development of 647 homes at Moreton Station would 'promote services and facilities where they need is identified'.
- 1.29 It is unclear what need for services and facilities has been identified for the 389 people who currently live in the village which growth could support. The text at paragraph 93 states that growth 'may be able to support

additional facilities or provide improvements to public transport provision' and off the back of this a general assumption that growth will bring positive medium to long term benefits has been concluded.

- 1.30 This conclusion is the case for any major growth. However, when a similar level of growth is assessed in Wareham, it is concluded (paragraph 76) that 'as further growth is limited, it is unlikely to support additional facilities or provide improvements to public transport'. This highlights the inconsistencies of the Council's approach to SA.
- 1.31 Further, this section of the Addendum completely fails to give proper regard to the baseline position and is inconstant with previous assessments. With regard to Moreton Station the table of page 23 sets out that there will be medium and long term positive benefits for the objective of 'helping everyone access basic services, reduce the need to travel by car and encourage cycling, walking and use of public transport'.
- 1.32 As already noted, previous assessments have concluded that growth at Moreton Station would have negative impacts on this objective. The Social Baseline confirms there is no bus service in the area, there are no existing facilities and a heavy reliance on the car. Given the assessment has assessed the impact of 647 additional dwellings (with no assumption about the mix of other facilities) it is unclear how it could be considered that development could improve access to services and facilities given the location of the site is fundamentally unsustainable.

f) Summary of Growth

- 1.33 Paragraph 138 of the Addendum states that 'the assessment of growth of the towns and key service villages show the key service villages as the most appropriate places for housing development with the most significantly positive effects and the least significantly negative effects as demonstrated by the summary table below'.
- 1.34 This statement is inaccurate. The assessment undertaken is not an assessment of the relative merits of the towns and services villages but it is a (flawed) assessment of the impact of a specific level of growth on individual settlements.
- 1.35 As noted above, the assessment is littered with inconsistencies, both internally and with previous work and cannot be considered to be a sound basis to judge the relative sustainability of settlements or to justify the proposed development strategy. For that reason, our position remains that the development strategy is not robust as it is not justified by the evidence base and will be ineffective in delivering sustainable growth.

Subject: Purbeck Local Plan Examination – additional comments
From: Mark Harris on behalf of Bellway Homes and A & F Baggs
Date: 9th September 2019



SD93 – APPENDIX – MITIGATION STRATEGY FOR THE EFFECTS OF HOUSING ON EUROPEAN SITES

- 1.1 We understand from the Wareham Neighbourhood Plan Statement of Common Ground that the existing Bog Lane SANG is proposed to mitigate adverse environmental impact of new houses, including for the recently proposed 90 homes at the former Middle School site (GS2).
- 1.2 Contrary to this, SD93 states at paragraph 21 that the provision of a new SANG to the west of Westminster Road is still under discussion, which is strange given that the Neighbourhood Plan is at examination and one would have assumed decisions regarding allocations and SANG would have been finalised prior to submission of the Plan for examination. Irrespective of the current position, what is certain is that there is a lack of clarity as to the detail and deliverability of the proposals in the Neighbourhood Plan.
- 1.3 In quantitative terms, as Bog Lane is an existing, operational SANG, with capacity to support additional homes, which could be considered to eliminate the need for any new SANG provision in the Wareham area.
- 1.4 However, SD93-Appendix - Summary of visitor monitoring Bog Lane SANG demonstrates that Bog Lane is a poorly used SANG, with visitor numbers of 0.6 people per hour. This compares locally with Frenches Farm (5 people per hour), and Upton Country Park (21 people per hour). The majority of visitor arrive at the SANG by car, suggesting the SANG serves a regional purpose, rather than being a resource for use by local residents who wish to walk to nearby destinations.
- 1.5 It is clear that the Bog Lane SANG does not fully fulfil its purpose of diverting recreation pressure away from the Dorset Heathlands, as proven by the council's monitoring evidence, and therefore does not comply with Appendix E of the Dorset Heathlands Planning Framework 2015-2020 Supplementary Planning Document.
- 1.6 Assuming that it is agreed that the Bog Lane SANG is non-compliant with the Supplementary Planning Document, without additional mitigation close to the residents it is to serve, the deliverability of the Wareham Neighbourhood Plan is in question, affecting the soundness of the Local Plan.
- 1.7 In contrast, land West of Wareham site can provide a new, extensive SANG, of good quality, immediately adjacent to its housing development, which would mitigate impacts on heathlands to a far greater extent than the developments proposed in the Wareham Neighbourhood Plan.

Purbeck Local Plan - Examination

TABLE 1b

Neame Sutton Assessment of Housing Trajectory

Using Council Housing Requirement

Sep-19

	Years 1-5							Years 6-10					Years 11-15				Year 16
	Total	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Completions	73	73															
Commitments Minor	208		111	43	49	5											
Commitments Major	304		75	139	50	12	28										
Housing Supply																	
Swanage Local Plan	40					38	2										
Wool	470			20	65	65	65	65	65	65	60						
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Lychett Matravers	150			15	85	50											
Upton	90					35	55										
Small Sites	138							30	18	48	18	8	7	9			
Neighbourhood Plans	290					21	21	31	41	41	20	20	20	20	20	20	15
Rural Exeptions																	
Windfalls	806				62	62	62	62	62	62	62	62	62	62	62	62	62
TOTAL	3059	73	186	217	311	288	283	238	236	266	210	140	139	141	132	122	77
Housing requirement	2880	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180
Annual shortfall/surplus		-107	6	37	131	108	103	58	56	86	30	-40	-41	-39	-48	-58	-103
cumulative shortfall/surplus		-107	-101	-64	67	175	278	336	392	478	508	468	427	388	340	282	179
base 5 year requirement		900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900
With shortfall/oversupply		900	1007	1001	964	833	725	622	564	508	422	392	432	473	512	560	618
With 20% Buffer		1080	1208	1201	1157	1000	870	746	677	610	506	470	518	568	614	672	742
Adjusted Annual Requirement (5yr)		216	242	240	231	200	174	149	135	122	101	94	104	114	123	134	148
5 Year Supply		1075	1285	1337	1356	1311	1233	1090	991	896	762	674	611	472	331	199	77
years Supply		5.0	5.3	5.6	5.9	6.6	7.1	7.3	7.3	7.3	7.5	7.2	5.9	4.2	2.7	1.5	0.5
Dwellings Required for 5-Yr Supply		-5	77	136	199	311	363	344	314	286	256	204	93	-96	-283	-473	-665

Notes:

1. Includes completion and commitment data from SD87 (based on updated trajectory table produced by Council in August 2019)
2. Requirement from LP Policy H1 as proposed to be modified - 180 dpa
3. Buffer of 20% applied as per LPA calculation in SD87
4. Supply data provided by Council by Email dated 28 May 2019 as updated from SD87 (note no trajectory has been provided by the Council so any alterations have been averaged)
5. Commitments reduced to remove 20 dwellings from Manor Farm Caravan Park because this is not a commitment and is instead only an assumption on the part of the Council see Paragraph 5.6 of SD86
6. Windfalls have been increased from 46 dpa to 62 dpa without any aparent justification
7. small sites reduced and removed from 5-year HLS

Purbeck Local Plan - Examination

TABLE 2b

Neame Sutton Assessment of Housing Trajectory - Neame Sutton Adjustments to Supply Using Council Housing Requirement

Aug-19

	Total	Years 1-5					Years 6-10					Years 11-15				Year 16	
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Completions	73	73															
Commitments Minor	208		111	43	49	5											
Commitments Major	304		75	139	50	12	28										
Housing Supply																	
Swanage Local Plan	40					38	2										
Wool	470			20	65	65	65	65	65	65	60						
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Lychett Matravers	150			15	85	50											
Upton	90					35	55										
Small Sites	138							30	18	48	18	8	7	9			
Neighbourhood Plans	290					21	21	31	41	41	20	20	20	20	20	20	15
Rural Exeptions																	
Windfalls	620							62	62	62	62	62	62	62	62	62	62
TOTAL	2873	73	186	217	249	226	221	238	236	266	210	140	139	141	132	122	77
Housing requirement	2880	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180
Annual shortfall/surplus		-107	6	37	69	46	41	58	56	86	30	-40	-41	-39	-48	-58	-103
cumulative shortfall/surplus		-107	-101	-64	5	51	92	150	206	292	322	282	241	202	154	96	-7
base 5 year requirement		900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900
With shortfall/oversupply		900	1007	1001	964	895	849	808	750	694	608	578	618	659	698	746	804
With 20% Buffer		1080	1208	1201	1157	1074	1019	970	900	833	730	694	742	791	838	895	965
Adjusted Annual Requirement (5yr)		216	242	240	231	215	204	194	180	167	146	139	148	158	168	179	193
5 Year Supply		951	1099	1151	1170	1187	1171	1090	991	896	762	674	611	472	331	199	77
years Supply		4.4	4.5	4.8	5.1	5.5	5.7	5.6	5.5	5.4	5.2	4.9	4.1	3.0	2.0	1.1	0.4
Dwellings Required for 5-Yr Supply		-129	-109	-50	13	113	152	120	91	63	32	-20	-131	-319	-507	-696	-888

Notes:

1. Includes completion and commitment data from SD87 (based on updated trajectory table produced by Council in August 2019)
2. Requirement from LP Policy H1 as proposed to be modified - 180 dpa
3. Buffer of 20% applied as per LPA calculation in SD87
4. Supply data provided by Council by Email dated 28 May 2019 as updated from SD87 (note no trajectory has been provided by the Council so any alterations have been averaged)
5. Commitments reduced to remove 20 dwellings from Manor Farm Caravan Park because this is not a commitment and is instead only an assumption on the part of the Council see Paragraph 5.6 of SD86
6. Windfalls have been increased from 46 dpa to 62 dpa without any aparent justification
7. small sites reduced and removed from 5-year HLS
8. Windfalls removed from first 5-years of Plan period

Purbeck Local Plan - Examination

TABLE 3b

*Neame Sutton Assessment of Housing Trajectory - Neame Sutton Adjustments to Supply - Requirement 200 dpa
Using Council Housing Requirement*

Aug-19

	Years 1-5							Years 6-10					Years 11-15				Year 16
	Total	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Completions	73	73															
Commitments Minor	208		111	43	49	5											
Commitments Major	304		75	139	50	12	28										
Housing Supply																	
Swanage Local Plan	40					38	2										
Wool	470			20	65	65	65	65	65	65	60						
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Lychett Matravers	150			15	85	50											
Upton	90					35	55										
Small Sites	138							30	18	48	18	8	7	9			
Neighbourhood Plans	290					21	21	31	41	41	20	20	20	20	20	20	15
Rural Exeptions																	
Windfalls	620							62	62	62	62	62	62	62	62	62	62
TOTAL	2873	73	186	217	249	226	221	238	236	266	210	140	139	141	132	122	77
Housing requirement	3200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Annual shortfall/surplus		-127	-14	17	49	26	21	38	36	66	10	-60	-61	-59	-68	-78	-123
cumulative shortfall/surplus		-127	-141	-124	-75	-49	-28	10	46	112	122	62	1	-58	-126	-204	-327
base 5 year requirement		1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000
With shortfall/oversupply		1000	1127	1141	1124	1075	1049	1028	990	954	888	878	938	999	1058	1126	1204
With 20% Buffer		1200	1352	1369	1349	1290	1259	1234	1188	1145	1066	1054	1126	1199	1270	1351	1445
Adjusted Annual Requirement (5yr)		240	270	274	270	258	252	247	238	229	213	211	225	240	254	270	289
5 Year Supply		951	1099	1151	1170	1187	1171	1090	991	896	762	674	611	472	331	199	77
years Supply		4.0	4.1	4.2	4.3	4.6	4.7	4.4	4.2	3.9	3.6	3.2	2.7	2.0	1.3	0.7	0.3
Dwellings Required for 5-Yr Supply		-249	-253	-218	-179	-103	-88	-144	-197	-249	-304	-380	-515	-727	-939	-1152	-1368

Notes:

1. Includes completion and commitment data from SD87 (based on updated trajectory table produced by Council in August 2019)
2. Requirement 200 dpa
3. Buffer of 20% applied as per LPA calculation in SD87
4. Supply data provided by Council by Email dated 28 May 2019 as updated from SD87 (note no trajectory has been provided by the Council so any alterations have been averaged)
5. Commitments reduced to remove 20 dwellings from Manor Farm Caravan Park because this is not a commitment and is instead only an assumption on the part of the Council see Paragraph 5.6 of SD86
6. Windfalls have been increased from 46 dpa to 62 dpa without any aparent justification
7. small sites reduced and removed from 5-year HLS
8. Windfalls removed from first 5-years of Plan period

Purbeck Local Plan - Examination

TABLE 4b

Neame Sutton Assessment of Housing Trajectory - Neame Sutton Adjustments to Supply - Requirement 228 dpa

Using Council Housing Requirement

Aug-19

	Years 1-5					Years 6-10					Years 11-15				Year 16		
	Total	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34
Completions	73	73															
Commitments Minor	208		111	43	49	5											
Commitments Major	304		75	139	50	12	28										
Housing Supply																	
Swanage Local Plan	40					38	2										
Wool	470			20	65	65	65	65	65	65	60						
Moreton	490						50	50	50	50	50	50	50	50	50	40	
Lychett Matravers	150			15	85	50											
Upton	90					35	55										
Small Sites	138							30	18	48	18	8	7	9			
Neighbourhood Plans	290					21	21	31	41	41	20	20	20	20	20	20	15
Rural Exeptions																	
Windfalls	620							62	62	62	62	62	62	62	62	62	62
TOTAL	2873	73	186	217	249	226	221	238	236	266	210	140	139	141	132	122	77
Housing requirement	3648	228	228	228	228	228	228	228	228	228	228	228	228	228	228	228	228
Annual shortfall/surplus		-155	-42	-11	21	-2	-7	10	8	38	-18	-88	-89	-87	-96	-106	-151
cumulative shortfall/surplus		-155	-197	-208	-187	-189	-196	-186	-178	-140	-158	-246	-335	-422	-518	-624	-775
base 5 year requirement		1140	1140	1140	1140	1140	1140	1140	1140	1140	1140	1140	1140	1140	1140	1140	1140
With shortfall/oversupply		1140	1295	1337	1348	1327	1329	1336	1326	1318	1280	1298	1386	1475	1562	1658	1764
With 20% Buffer		1368	1554	1604	1618	1592	1595	1603	1591	1582	1536	1558	1663	1770	1874	1990	2117
Adjusted Annual Requirement (5yr)		274	311	321	324	318	319	321	318	316	307	312	333	354	375	398	423
5 Year Supply		951	1099	1151	1170	1187	1171	1090	991	896	762	674	611	472	331	199	77
years Supply		3.5	3.5	3.6	3.6	3.7	3.7	3.4	3.1	2.8	2.5	2.2	1.8	1.3	0.9	0.5	0.2
Dwellings Required for 5-Yr Supply		-417	-455	-453	-448	-405	-424	-513	-600	-686	-774	-884	-1052	-1298	-1543	-1791	-2040

Notes:

1. Includes completion and commitment data from SD87 (based on updated trajectory table produced by Council in August 2019)
2. Requirement 228 dpa
3. Buffer of 20% applied as per LPA calculation in SD87
4. Supply data provided by Council by Email dated 28 May 2019 as updated from SD87 (note no trajectory has been provided by the Council so any alterations have been averaged)
5. Commitments reduced to remove 20 dwellings from Manor Farm Caravan Park because this is not a commitment and is instead only an assumption on the part of the Council see Paragraph 5.6 of SD86
6. Windfalls have been increased from 46 dpa to 62 dpa without any aparent justification
7. small sites reduced and removed from 5-year HLS
8. Windfalls removed from first 5-years of Plan period



Examination of the Purbeck Local Plan

Matter B: Housing Need and Requirement

Matter C: Green Belt

Matter D: The Strategy for Development – Spatial Strategy

Written comments on behalf of Bloor Homes Southern on further documents prepared by Dorset Council after the hearing sessions on Matters A, B, C and D

September 2019

1. Bloor Homes Southern attended July 2019 hearings sessions on Matters B, C and D. Following these hearings Dorset Council prepared additional documents in response to queries and discussions.

2. The additional documents prepared by Dorset Council relevant to Matters B, C and D were as follows:

SD14: Updated list of Main Modifications, 2 August 2019 (NB - It is recognised that any formal consultation on main modifications will take place at a later date)

SD85: Housing need (updated 12 August 2019)

SD86: Review of Sources of Housing Supply (updated 12 August 2019)

SD87: Review of 5-year Purbeck Housing Land Supply including detailed trajectory

SD88: Review of Capacity of Small sites (updated 12 August 2019)

SD93: Mitigation Strategy Green Belt (updated version issued 12 August 2019)

SD94: Explanation of housing numbers at Moreton Station (updated 12 August 2019)

SD98: Estimation of affordable housing delivery on small sites and windfall (updated 12 August 2019)

3. Comment is made on each of these documents in turn.

SD14: Updated list of Main Modifications, 2 August 2019

4. It is recognised that any formal consultation on main modifications will take place at a later date. The new text is shown in green.



Settlement hierarchy

5. MM32 and MM33 seek to introduce a settlement hierarchy into the new plan, drawing from the adopted approach of the adopted part 1 plan.
6. Bloor Homes objects to the position of Lytchett Minster in this hierarchy, which Dorset Council claims is influenced by:

The size and range of facilities offered in a settlement when determining its position in the settlement hierarchy – for the most part those settlements lower in the hierarchy generally have smaller populations and comparatively smaller range of services and facilities. The settlements position in the hierarchy is also determined by a judgement around their local influence. Similarly sized settlements with a similar range of facilities may be ranked at different levels in the settlement hierarchy because of their influence as a hub for the local community.

7. Bloor Homes finds that the council's whole approach to categorising settlements is flawed and there is not an up to date and reliable evidence base to support it.
8. For Lytchett Minster it is noted that:
 - Lytchett Minster is located on an old main road, Dorchester Road, and is served by eight bus stops. There are buses to Swanage and Weymouth in one direction and Upton and Poole in the other. The bus services are more frequent than hourly and continue until after 9pm
 - The village was bypassed with the construction of the A35 dual carriageway in the 1980s, which is a main trunk road route along the south coast. The residual highway infrastructure through the village is 'oversized'.
 - Lytchett Minster is 2.5km from the centre of Upton, 3km from Purbeck's largest business and industrial area at Holton Heath Trading Park (Admiralty Park) and just over 7km from Poole town centre, meaning all these destinations are accessible to commuters who cycle, walk or use public transport. Much of the cycle route is off the road and the sections on the road are on marked cycle lanes.
 - The nearest main line railway station is at Holton Heath (3.6km), which offers hourly services on the Weymouth to London.

Lytchett Minster has in the centre:

- Two pubs, The Bakers Arms and The St Peter's Finger.
- Lytchett Minster Rugby Club with a Clubhouse and kitchen available for community functions and two rugby pitches
- The Parish Church and 'CJs' Community Hall. CJ's has a kitchen and hall and is available for hire. There are weekly keep fit classes and a weekly youth group.



- A Nursery School / Kindergarten, 'Kids Love Nature, taking children from 1-5 years old for 51 weeks of the year from a wide geographical radius around Lytchett Minster.
- The Accountancy Cooperative, a firm of accountants.
- New office space (117sq m) at Charity Farm.
- Lytchett Minster Secondary School for about 1,400 pupils which itself offers:
 - Employment for 160 people.
 - A sports hall open to the public including for public use a 3G floodlit astro pitch, outdoor cricket nets, netball and tennis courts, a full-sized sports hall, gymnastics hall and fitness suite.
 - Various clubs and classes for the wider community including badminton, tennis, basketball, netball, circuit training, kickboxing, gymnastics, trampolining and five a side football. This list is not exhaustive.
 - Community rooms for meetings
 - A wedding venue.

Slightly more peripheral there is:

- The South Lytchett Manor Caravan and Camping Park which runs for 10 months of the year and has a shop open to the public. This is within easy walking distance from the centre of Lytchett Minster along wide pavements which are lit at night.
 - Also within walking distance is The Courtyard Craft Centre, which is open round the year with 20+ businesses including a restaurant, hairdresser, haberdashery, bridal shop, chiropodist and pet shop.
9. In view of the above, it is considered that Lytchett Minster could be readily lifted higher in the settlement hierarchy assuming that positive judgments are made about its local influence, infrastructure and capacity for further growth. The existing highway infrastructure, good bus links, and the presence of a major secondary school at the village are noted in particular.
10. Wareham and Swanage are the only other settlements in Purbeck that have secondary schools (the Purbeck School in Wareham and the Swanage School are both smaller than Lytchett Minster School). We also draw attention to the close spatial relationship between Lytchett Minster, Lytchett Matravers and Upton and the potential to further enhance the links between the settlements.

Small sites



11. The proposed approach to capping the number of homes on small sites (MM51, MM53) is arbitrary and has no relationship to site-specific opportunities and constraints.
12. The small sites strategy overlooks the development potential that exists on sites adjoining villages within the green belt in more sustainable locations.
13. The small sites approach also creates problems in terms of confirming mitigation in relation to protected heathland (MM52), as it is not clear that developments will occur where suitable mitigation, such as SANG, can be provided.

SD85: Housing need (updated 12 August 2019)

14. Bloor Homes disagrees with Dorset Council that the proposed (revised) level of growth at 180 dwellings per annum already represents a substantial policy uplift for the area.
15. The objectively assessed need for the plan area was assessed in 2012 as being 170 dwellings per annum and it was originally intended that an early partial review of the Purbeck plan would be adopted by 2017 and finally deliver this requirement. The adoption of the part 1 plan (LP1) with a constrained provision of 120 dwellings per annum was intended to be a “*short term expedient approach*” and “*if there was any evidence that this could not be achieved then LP1 would not be sound*” (Paragraph 32, LP1 Inspectors report, October 2012). Indeed paragraph 129 of that report states that “*It could be argued that this approach to housing lets the Council ‘off the hook’ in the short term*”.
16. The proposed (revised) housing requirement still fails to properly account for affordable housing need, economic potential/aspirations and – in particular - taking unmet need from neighbouring areas (including much of the wider Dorset Council and BCP Council areas. NB - there is not a current five-year supply of land for housing in most other former Dorset district areas). It is Bloor Homes’ view that to adopt a plan with the requirement of 180 homes per annum would be a constrained figure, letting them off the hook in terms of housing provision and not fully supporting people’s needs.

SD86: Review of Sources of Housing Supply (updated 12 August 2019)

17. No comment from Bloor Homes.

SD87: Review of 5-year Purbeck Housing Land Supply including detailed trajectory

18. No comment from Bloor Homes.

SD88: Review of Capacity of Small sites (updated 12 August 2019)

19. Bloor Homes considers that the small sites policy is flawed and this evidence paper is not robust. Suitable sites should be allocated in a plan area to achieve the housing requirement. It is notable that the ‘potentially suitable’ sites identified in this report focus on Winfrith Newburgh and Swanage in particular, and more generally the vast majority of the small site potential identified is at settlements within AONB. The review



of sites does not offer robust evidence (particularly on landscape matters) to support its findings.

20. The small sites strategy overlooks the development potential that exists on sites adjoining villages in more sustainable locations.

SD93: Mitigation Strategy Green Belt (updated version issued 12 August 2019)

Missing information

21. Tables 1 and 3 are incomplete and potentially misleading. The tables do not clarify which of the SANGs is within the Purbeck Plan area. For example only part of the Upton Country Park / Upton Farm SANG is within Purbeck and its delivery is being phased to coincide with housing growth in Poole (NB the SANG land was owned and planned by the former Borough of Poole).
22. Despite the stated Action 16 requirement, SD93 offers very limited information on the deliverability of proposed SANGs. Simply stating that a SANG is proposed in the plan is insufficient. For example the ownership of each proposed SANG land parcels is not provided, nor is evidence put forward about whether the landowner is making the land available for SANG purposes in relation to development proposed in the PLP 2019 or a neighbourhood plan. We would urge the Inspector to closely scrutinise any further information that may be put forward on this matter.

Strategic SANG in North Purbeck

23. Bloor Homes wishes to re-emphasise the comments made by Clare Lees of the South Lytchett Estate in her letter response on SD93 dated 3 August 2019:
 - At no time has The South Lytchett Estate been asked to provide or been consulted upon the potential of providing a strategic SANG by either Natural England or by Purbeck District Council.
 - The initial SANG proposals put forward at options stage by The South Lytchett Estate and Bloor Homes at Bere Farm and Lytchett Minster were designed to address housing proposals at these sites alone and were not any form of strategic SANG proposal. The site specific SANG proposals never progressed beyond crude sketches as both sites were discounted by Purbeck District Council in 2017.
 - The South Lytchett Estate covers over 2,000 acres and contains both farmed and wilder areas and over 150 acres of woodland.
 - The South Lytchett Estate lies directly between Sherford Bridge and the postcode of the majority of visitors to this location (SD93 para 35).
24. Variations to the siting of each site-specific SANG proposal previously put forward in the Bere Farm and Lytchett Minster area is possible. For example, an alternative to the SANG proposal shown on SD93 Map 6 has been previously discussed with Natural England that would involve a SANG to the immediate west of a development area. However the potential for site-specific SANGs to comprise or form part of a wider mitigation proposal has not been explored to date.



25. In principle, being adjacent to Lytchett Matravers, the land is well positioned in relation to the requirement as expressed by the PLP1 HRA [SD76], which states at paragraph 5.52 that the following broad location would be ideal for SANG provision:

- *“In the north of the district, between Lytchett Matravers and Bere Regis...suitably located to provide opportunities for dog walking and other recreational activities for residents of Lytchett and Bere Regis”.*

26. SD93 indicates at paragraph 35 the specific need to intercept visitors otherwise going to the protected Morden Bog along the A35 corridor, including from Corfe Mullen and Poole in the east. However, it is noted at paragraph 6.8 of the 2018 HRA [SD03] that a proposed holiday park at Morden Park will itself add pressures, because residents of the chalets would be likely to explore the full extent of Wareham Forest (which would be the draw to staying there). SD03 also suggests a SANG at Morden Park would mitigate other developments in Purbeck although we would question whether the provision of a new SANG so close to Morden Bog/Wareham Forest would be suitable in this respect.

27. Bloor Homes considers that there is potential for various SANG arrangements in the Bere Farm / Lytchett Minster area. SANG provision in the Lytchett Minster and Bere Farm area is likely to be attractive - and importantly - very convenient for dog walkers and other recreation visits with an origin in the Lytchett Matravers, Corfe Mullen and Poole area. The area already benefits from existing visitor facilities, for example café provision at the converted Bere Farm buildings. Further exploration of SANG potential is required as part of a comprehensive development and strategic greenspace mitigation / recreation scheme.

SD94: Explanation of housing numbers at Moreton Station (updated 12 August 2019)

28. No comment from Bloor Homes.

SD98: Estimation of affordable housing delivery on small sites and windfall (updated 12 August 2019)

29. No comment from Bloor Homes.

Purbeck Local Plan Examination 2019

Representations on August 2019 Examination Documents

8 Sep 2019

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1 Summary

This document contains comments on some of the new information and documents submitted during August 2019 to the Local Plan examination for Purbeck (**SD14** (updated), **SD89**, **SD93**).

2 The Habitats Regulations

2.1 SD89, Proposed Amendments to the HRA & Consultation

2.1.0.1 The public only had visibility of the pre-submission version of the HRA, upon which consultation responses were founded. It is not possible to comment on a future version of the HRA outlined in **SD89**. If the HRA changes significantly from the consultation version, except to accommodate changes in the LP, one questions the validity of the original consultation.

2.2 HRA Compliance with Case Law and Guidance

2.2.0.1 **SD89** has commented on some case law relating to Appropriate Assessments that was discussed in the examination. The examples covered are just a subset of established case law and are not comprehensive. Any revised HRA should follow the EC Guidance Document – Managing Natura 2000 sites – the provisions of Article 6 of the Habitats Directive 92/43/EEC – Nov 2018 and all case law (which this guidance aimed to encompass).

2.3 New PPG on Appropriate Assessments

2.3.0.1 The new PPG on AA confirms that the government’s approach to AA follows the EC guidance. I note especially,

“An appropriate assessment must contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project.”

2.4 HRA Other Issues

2.4.1 Mitigation on the Coastal Sites

2.4.1.1 **SD14** (updated main modifications) **MM36** now includes the missing coastal European sites. This statement,

“The HRA identifies that there is potential risk from increased recreation, but visits from new development will be a very small part of the already significant visitor pressure and the local authority should hold a watching brief.”

contradicts EC guidance on *avoiding* deterioration (Habitats Directive Article 6.2) and appropriate assessment. The HRA of the adopted LP (see section 7 of **SD76**) made a good case for both mitigation and monitoring and identifies more than a “potential risk” (though the mitigation is inadequately defined in the adopted LP para. 7.5.12). The assertion that local development would be only a small increase in “*already significant visitor pressure*” still means that there is a LSE to be mitigated. The visitor pressure on the coast is likely to grow with government encouragement of outdoor activities and initiatives like National Trails and the World Heritage status. These issues need to be covered in the HRA.

2.4.2 Corfe Common

2.4.2.1 **SD14** (updated) **MM38** contains,

“Corfe Common is also a designated SAC and listed Ramsar site Natural England will be consulted on additional residential proposals within the Corfe Common SSSI 400 metre Consultation Area to assess any potential impacts upon the wetland habitat of the southern damselfly, a protected species.”

Any assessment should not be limited to the habitat of the southern damselfly but to the integrity of the SAC and Ramsar designation. What is the scientific case to support treating CC differently from other parts of the Dorset Heaths?

2.4.2.2 The council confirmed during the examination that CC should be treated the same as other areas of heathland with regard to the 400m-5km zone. In that case, the policies map needs to be corrected.

2.4.3 Inappropriate Wording of Policy E7 (MM39)

2.4.3.1 **SD14** (updated) **MM39** contains,

*“Development will only be permitted where it would not lead to an adverse effect upon the integrity, either alone or in-combination, directly or indirectly, of nationally, European and internationally protected nature conservation sites. The Council will determine applications adversely affecting these sites in accordance with the recommendation of the relevant assessments under the Habitats Regulations and policy **E8** and **E9**, or appropriate to the adverse effects identified.”*

This statement is unclear because if an application adversely affects a site it should not be consented (except under IROPI). Perhaps the second sentence would be better rephrased as,

The Council will determine all applications in accordance with the Habitats Regulations and policies **E8** and **E9** as appropriate to any LSEs and proposed mitigation.

2.4.4 Nitrogen Neutrality for Poole Harbour

2.4.4.1 **SD14** (updated) **MM41** on nitrogen neutrality ought to apply to all residential developments (including, for example, care homes).

2.4.4.2 Dr. A. Warne identified an important flaw in **SD80**, the Nitrogen Reduction in Poole Harbour SPD during the examination. When indirect methods (offsetting by removing agricultural land) are used to support a development, there is a time delay to the reduction in nitrogen release into rivers. This delay may be many years, but the development will start releasing nitrogen as soon as it is occupied. Therefore, the net release of nitrogen to Poole Harbour SPA will actually rise for some time, contrary to mitigating the development's effects. This can be avoided by direct methods of mitigation such as nitrogen-stripping. An increase in nitrogen load also arises from household pets and fertilizers on gardens. These issues need to be taken into account in any project-level AA, and the SPD should be modified to account for them.

2.4.4.3 Para. 26 of **SD80** states,

“This SPD will be supported by a monitoring and implementation plan, updated regularly, that sets out how much mitigation is required and how it has been or will be secured. It is critical that sufficient mitigation (direct or indirect) is planned to come forward in the catchment to meet the expected delivery of housing. In extreme circumstances the local authorities may have to refuse planning applications for new housing development until such a time as adequate mitigation has been provided.”

Currently, there is no I&M plan, so it is not possible to audit how developments are achieving nitrogen neutrality, including the calculations used to assess it, or the results of monitoring.

2.4.5 Poole Harbour and Recreation Effects

2.4.5.1 **MM41** on recreational effects refers to “*sufficiently mitigated*” when it should just be “mitigated”. The draft Poole Harbour Recreation SPD, **SD81**, is vague about what mitigation is required, or how it would be implemented and monitored, despite the acceptance that harm is already occurring (see the background paper, **SD78** sec. 4, p. 29) and should be subject to remedial action under Article 6.2 of the Habitats Directive.

2.4.5.2 **SD14** (updated) **MM48** has not included the effects of developments in Wareham on Poole Harbour recreation.

2.5 Project-level Appropriate Assessment & Revised MMs

2.5.0.1 The LP makes confusing comments about project level compliance with Habitats Regulations. At a plan level, the HRA concludes that the quantum of development requires mitigation in various ways. For example, 2880 new houses cause various impacts that must be mitigated. Therefore, any housing development that is part of that total (or in addition to it) will, in combination with the LP itself (and possibly other plans or projects), *almost certainly* require mitigation. However, the LP gives the impression that this may not be the case.

2.5.1 Chapter 4. Housing, new paragraph 150

2.5.1.1 **SD14** (updated) **MM52** contains,

“The individual assessments will need to take account of in combination effects. Including effects of development which has planning permission, is being built and that is already completed.”

This gives the impression that planned development without planning permission (such as the balance of the LP itself) might be discounted, which would be wrong.

2.5.2 Policy H8

2.5.2.1 **SD14** (updated) **MM53** contains,

“d. the effects of proposed homes, individually and in combination with other development, on European sites are screened to assess whether they are likely to be significant. Where necessary planning applications must include full details (including upkeep over the lifetime of the development) of mitigation to avoid or suitably reduce adverse effects.”

Mitigation should prevent adverse effects, not “*suitably reduce*” them. This statement should be something more like,

d. the effects of proposed homes, individually and in combination with other plans and projects including this LP, on European sites are screened to assess whether they are likely to be significant. Where LSEs are concluded, an AA shall be undertaken to avoid or mitigate them. Where mitigation is necessary, planning applications must include full details (including upkeep over the lifetime of the development).

2.5.2.2 In practice, very few sites in Purbeck could conclude no LSEs when considered in combination with just the LP itself and some mitigation is almost certain to be necessary. This sub-clause is really just a restatement that all developments must comply in full with Habitats Regulations so it could be replaced by a reference to Policy **E7**, perhaps retaining the comment on upkeep and lifetime.

2.5.3 Chapter 4. Housing, Changes to Paragraph 171

2.5.3.1 **SD14** (updated) **MM57** contains,

“The effects that affordable, and market, homes have on protected habitats will need to be carefully considered on a case by case basis. The individual assessments will need to take account of in combination effects including effects of development that has planning permission, is being built and that is already completed. Where necessary the Council will expect applicants to provide full details of mitigation with their planning application and demonstrate that mitigation can be delivered and maintained over the life time of development.”

Similar comments apply here as to **MM52 & MM53**.

2.5.4 Policy H12

2.5.4.1 **SD14** (updated) **MM58** contains,

“the effects of proposed homes, individually and in combination with other development, on European sites are screened to assess whether they are likely to be significant. Where necessary planning applications must include full details (including upkeep over the lifetime of the development) of mitigation to avoid or suitably reduce adverse effects;”

Similar comments apply here as to **MM52 & MM53**.

2.5.5 Implementation and Monitoring Table Relating to Policy H8

2.5.5.1 **SD14** (updated) **MM22** contains,

“Progress on delivery of housing numbers delivered in relation to the small sites policy to be reported in the authority monitoring report. Monitor the number and spatial distribution of homes permitted on small sites to ascertain whether the cumulative impacts of development are likely to have significant effects on European sites that would require mitigating.”

This gives the impression that impacts from small sites may not require mitigation if they are few and spread out. However, when considered in combination with the other developments in the LP alone, most, if not all, small sites will require some mitigation. This monitoring could usefully check to see whether any *additional* LSEs arise specifically because of clustering of small sites.

2.5.6 Policy I1b

2.5.6.1 **SD14** (updated) **MM25** contains,

*“b. on allocated sites compliance with policy requirements to address Habitats Regulations related to heathland mitigation and nitrogen reduction in Poole Harbour will be secured through Section 106 **payments**. Habitat Regulations requirements in relation to the recreational impacts on Poole Harbour and small sites will be funded through CIL.”*

Note that this refers to S106 “*payments*” whereas the LP **SD01a** refers to S106 “*agreements*”. Presumably, the latter is correct. The problem with this new wording is that mitigation is now apparently limited to heathland mitigation, nitrogen reduction and Poole Harbour recreation, which is not the totality of possible mitigation required under Habitats Regulations. The first sentence should be changed to,

b. on allocated sites compliance with policy requirements to address Habitats Regulations, **except recreational impacts on Poole Harbour**, will be secured through Section 106 **agreements**.

in order not to limit the scope of mitigation.

2.5.6.2 **SD14** (updated) **MM26** refers to “*around 50 homes*”. Presumably, this should be “*more than around 50 homes*”.

3 Other Issues

3.1 Infrastructure Policy I5

3.1.1 SANG Options in North Purbeck

3.1.1.1 Paragraph 255 of the new LP states that,

“However, to mitigate for infill and windfall homes unable by virtue of their size to provide bespoke heathland mitigation measures, a strategic SANG is required in the north of Purbeck.”

The current HRA does not go so far as *requiring* a single strategic SANG in the north in order to satisfy Habitats Regulations, and the HRA for the adopted LP (**SD76** para. 5.52) states,

“The following broad locations will be ideal for SANGS provision:

In the north of the district, between Lytchett Matravers and Bere Regis or to the north of Bere Regis, suitably located to provide opportunities for dog walking and other recreational activities for residents of Lytchett and Bere Regis. . .”

so SANG(s) generally in the north of the district are desirable to mitigate the effects of residents of Lytchett and Bere Regis, but there is no requirement for a single, “strategic SANG” there.

3.1.2 What is a Strategic SANG?

3.1.2.1 The adopted LP does not differentiate site-specific and strategic SANGs and uses the term “strategic SANG” to apply to all SANGs

- between Bere Regis and Upton
- at Combe Wood, North Wood and surrounding fields (Wool)
- at Holme Lane, Stoborough
- and Swanage

to be implemented via the emerging “*Heathlands DPD*”, which presumably became the Dorset Heathlands SPD.

3.1.2.2 The use of the term “strategic SANG” seems to have changed to mean something different from, or in addition to, whatever the Dorset Heathlands SPD would require of a development (**SD93** para. 20) and this concept is absent in the adopted LP.

3.1.3 SANG Provision that is not Related to Future Housing Development in Purbeck

3.1.3.1 The new LP, HRA and Dorset Heathlands SPD reason that SANG provision is driven by the location and size of housing development. Therefore, the creation of a “strategic SANG” that is not directly related to housing allocations or applications in Purbeck falls outside this reasoning.

3.1.3.2 The small sites/windfall policy **H8** ought to be able to support its own mitigation via infrastructure delivery under policy **I1b**. CIL could be used to fund SANGs and/or SAMMs. However, CIL is a one-off payment whereas mitigation expenses are on-going, so in principle the CIL should cover the net present cost of all future expenses. This treatment would be comparable with the demands on larger sites and would recognise the true costs of development. The significant proportion of housing arising from policy **H8** makes it essential to address its mitigation properly, but the location of that housing is uncertain and so is the required mitigation.

3.1.3.3 Referring to the north of the District:

- The north east of the District is almost entirely Green Belt, and therefore only very limited development is expected there. (E.g. Table 7 of **SD93** shows no “small sites” in the north east).
- New LP site allocations at Lytchett Matravers which do change the Green Belt boundary already have SANG provision, as does the Bere Regis neighbourhood plan. Developments arising from the adopted LP are presumably already mitigated via its own policies.
- A “strategic SANG” in the north of the District would be the only one not directly associated with new housing development in Purbeck.
- The Wild Purbeck NIA Visitor Survey Analysis Report (Cruickshank & Floyd 2014) maps 21 & 22 show that the most intense visitor pressure on the heaths north of Wareham arise near Tantinoby Farm and the Sika Trail in the south west, and east of the B3075 associated with parking at Lawson’s Clump and Great Ovens, not the Sherford Bridge parking near Morden Bog.

3.1.3.4 Para. 35 of **SD93** states,

“A strategic SANG is needed in the north of Purbeck to:

- provide an alternative location specifically for those people visiting Morden Bog SSSI, SPA, SAC and Ramsar which is within the wider Wareham Forest area (visitor data from Sherford Bridge, immediately south of the proposed SANG and north east of Morden Bog indicates that the majority of visitors to the protected Morden Bog access the site along the A35 corridor, Bere Regis in the west and Lytchett Matravers, Corfe Mullen and Poole in the east); and*
- address the additional effects of new housing development expected in this part of the area (including completed and expected windfall development, and allocations from earlier plans).”*

However, new housing development (other than allocated sites) in the north east is limited by the GB status, and any completed windfalls and allocations from earlier

plans should have provided their own mitigation otherwise they would not have complied with the Habitats Regulations. This leaves a potential SANG requirement for the small amount of new development on unallocated sites in the north east that might be acceptable inside the GB and existing (or future) pressures from visitors outside the area.

3.1.3.5 If a SANG is (even partly) required for remedial action to the heaths in the Morden Bog area, this is a separate issue that is not covered by the Dorset Heathlands SPD and is related to existing, not future, problems (see NE letter in **SD93**). If remedial action is not currently required, then this SANG, just like the others, may be needed only to mitigate future developments in Purbeck and increased visitor pressure from outside. These functions should be separated as different statutory duties, solutions and funding options apply to them.

3.1.4 Are any Identified Needs Dependent upon Policy I5?

3.1.4.1 Policy **I5** is classified as strategic, but what identified needs could **not** be delivered if a SANG at Morden were **not** created? It is not clear that any LP policies depend upon the delivery of precisely this SANG.

3.1.4.2 The dependence of a truly strategic policy on a single, potential planning application for a holiday park would be unsound, especially when there is no identified need for that development (Framework paras. 20, 21, 28 and 25 are especially relevant, and paras. 99 & 100 of the Inspector's report on the adopted LP, see section [A.2.1](#)).

3.1.5 Is Policy I5 Needed?

3.1.5.1 An application for a holiday park at Morden could be proposed in the normal course of events, and does not require any bespoke policies for it to be assessed. The possible inclusion of a SANG would be just part of the consideration.

3.1.5.2 The council proposed at the start of the examination to delete mention of the holiday park at Morden in policy **I5** under **SD14**, **MM20**. It is therefore not clear why policy **I5** is needed, least of all as a strategic policy. The council clearly believed that the holiday park at Morden was not essential to delivery of the LP's other policies, as no other related changes were proposed at the time.

3.1.5.3 Since this section of the LP is intended to cover strategic SANG infrastructure, LP paras. 255-257 and policy **I5** should either be deleted, or modified to address

- SANG provision that is not already covered by other policies (such as **H3-H6**) and is necessary for the identified needs of the LP, and
- remedial action for existing harm to European sites, and
- dealing with anticipated increases in external visitor pressure.

3.2 Policy V2

3.2.1 Green Belt Boundary Changes

3.2.1.1 **SD93** has not offered any new justification for releasing Green Belt at Morden, so my comments in **SD90** still apply.

3.2.1.2 The policy to release GB at Morden and the definition of the affected area was not consulted upon until the pre-submission draft of the LP. Appendix A shows how consultation on this proposal evolved.

3.2.2 Alternatives to a SANG at Morden

3.2.2.1 The NPPF states that alternatives must be sought before releasing GB. In this case, the motivation to release GB is simply to facilitate one particular “enabling development” that is not in itself strategic and that would be inappropriate development in the GB. Alternatives to the SANG could remove this motivation and so preserve the GB intact.

3.2.2.2 **SD93** paras. 36-40 put forward (and dismiss) the Bere Farm or Lytchett Minster options as “alternatives”, but they are not comparable with a SANG at Morden as they would also deliver significant housing. These were old, outline development proposals and the South Lytchett Estate has not been approached since about possible, more relevant, alternatives.

3.2.2.3 Other alternatives to a SANG at Morden might include:

- SANG/HIP provision further south where the heathland visitor intensity is greatest, or other sites in Purbeck,
- SANGs outside the district to absorb visitors before they get to Morden, and
- SAMMs around Sherford Bridge, and
- modifications to the new housing distribution.

3.2.2.4 The necessity of a SANG at Morden is an important factor (though not the only one) in any decision to release GB to enable it, and that necessity has not been evidenced.

A Chronology of the Morden Holiday Park Proposal

A.1 Summary

A.1.0.1 The Morden holiday park has been mooted for several years, but being in the GB, development would be very difficult to justify. The linking with SANG

provision post-dates the adopted LP and is the putative justification for harming the GB, either by inappropriate development inside the GB, or by removing GB status from the site. Successive HRAs have pointed out the risks of development at Morden as this would bring more people into very close proximity with the heath.

A.1.0.2 The eventual policy to remove land at Morden from the GB was not explicitly consulted upon prior to the pre-submission draft of the LP. Even in the LP draft, only the policies map actually shows this change. There is no supporting text to alert the reader to this major change in GB policy which releases more GB land than all the housing allocations combined. Earlier public consultations had included the Morden holiday park proposal in outline, but with no statements about consequential release of GB or any definition of revised GB boundaries there.

A.1.0.3 The following sections evidence the evolution of the Morden holiday park proposal through the earlier stages of consultation. Any emphasis is mine.

A.2 The Inspector's Report on the Adopted Local Plan 12/2012

A.2.0.1 The Inspector's comments relate to whether Morden holiday park could be classified as a **strategic recreational site** in the AONB and GB and whether its benefits could outweigh its harm. There is no mention of SANGs. Since then, the council has not advanced any compelling evidence that the holiday park is itself a strategic issue.

A.2.1 The Report

A.2.1.1 Para. 98 *"It was suggested that new tented camping sites (or extensions to existing sites) should be allowed in the AONB and green belt in order to support economic growth in rural areas and more specifically that Morden Park should be identified as a **strategic recreational site**."*

A.2.1.2 Para 99 *"The Framework (para 115) makes it clear that great weight should be attached to the protection of the AONB and to retaining the openness of the green belt (para 79). The Council's approach reflects this need for protection and **no substantive evidence was presented to demonstrate that the need for tourism related economic growth should outweigh this important objective.**"*

A.2.1.3 Para. 100 *"With regard to Morden Park it is the ambition of the landowner that the area is opened up to the public as a Country Park with some tourist accommodation. On the face of it this seems to be a suitable use for such a site but firstly there is **no compelling evidence that this is a strategic issue** and therefore consideration of the matter would be more appropriately accommodated in a forthcoming element of the local plan;..."*

A.3 The Issues and Options Consultation 01/2015

A.3.0.1 At this stage, the Morden holiday park proposal is quite ill-defined, but **in** the GB rather than removed from it, as the following documents evidence. The contemporary HRA does not identify a SANG at Morden as essential mitigation, and identifies several problems with this site. The SA makes no mention of potential GB loss there.

A.3.1 The Consultation Document

A.3.1.1 Paras. 61-66 and Issue 5 did not identify any potential GB changes at Morden.

A.3.1.2 Paras. 95-98 and Issue 16 cover Morden holiday park. In Issue 16, “*Natural England **would like** the Council to identify a strategic SANG in north Purbeck, as it would help direct people away from internationally-protected conservation sites elsewhere.*” The park is described as, “...developing land **in the Green Belt**”. The associated map does not identify any land to be removed from the GB, and there is no mention of it in the text.

A.3.1.3 There is some ambiguity to terms like “in the Green Belt”. Does it mean

- within the current & future GB, or
- in the current GB, but not in a future GB from which land has been released?

In the absence of any explanation, there is no reason for a consultee to conclude the latter.

A.3.2 The HRA 01/2015 (SD73)

A.3.2.1 In the HRA Summary (p. 2) “*Assessment of the tourist development and country park at Morden (Issue 16), indicates that the area suggested for the chalets is very close to designated heathland and potentially even abuts or includes designated heathland. Likely significant effects to the interest features of the adjacent sites would include disturbance to Annex I birds, increased fire incidence, trampling, dog fouling, water quality. The areas outside the designated site boundary are likely to be important for nightjar and woodlark, in terms of foraging and possibly even breeding sites, and therefore are functionally linked to the SPA. Careful, detailed design and discussion with Natural England will be essential to consider the constraints at this location and the potential for the chalets and country park to have no adverse effects on the integrity of the European site, we suggest design elements that need to be considered. The country park could have the potential to act as a strategic SANG, and we consider the design elements and likely issues with the location, drawing on recent visitor data. Whether the site is able to provide the dual role of a country park and location for tourist accommodation needs further consideration.*”

A.3.2.2 Para. 6.31 *“If the Country Park at Morden (Option 16) is established, then this has the potential to function as a strategic SANG and draw access from residents at Lytchett Minster. The SANG will need to be established and monitoring in place to show how well it works prior to any development at Lytchett Minster. The effectiveness of such a SANG is discussed in paragraph 8.5.”* Since then, the development plans have changed significantly and these comments are out of date.

A.3.2.3 Section 8 is the appropriate assessment of Morden holiday park, which covers the issues raised in the summary in more detail. There is no mention of GB (which is not an HRA consideration). The SANG at Morden is **not** identified as a requirement for mitigation in the AA.

A.3.3 The Sustainability Appraisal 01/2015 (SD69)

A.3.3.1 Issue 5, p. 83 in relation to GB does not identify or assess any changes at Morden.

A.3.3.2 Issue 16, p. 121 in relation to the holiday park, does not mention any release of GB and states *“This option would see the **development of land in the green belt** for tourist accommodation.”*

A.3.4 Issues and Options Consultation Report - Summary 06/2015

A.3.4.1 Para. 156. *“Officers note both the support for and concerns over the proposal and the Council will need to take them into consideration when determining whether **exceptional circumstances** exist to enable the allocation of development **in the Green Belt.**”* This suggests the council was thinking of GB changes, but clearly only as a possibility, and this interpretation would not be obvious to a lay reader.

A.4 The Preferred Options Consultation 06/2016

A.4.0.1 At this stage, Morden holiday park proposal is still referred to as being in GB without any explicit mention of GB boundary changes.

A.4.1 The Consultation Document

A.4.1.1 Paras 185-195 and Preferred Option 11 describe Morden holiday park as a development **in green belt**, not a development on released green belt. Details of the SANG were lacking at this time.

A.4.1.2 The 06/2016 Green Belt study (see [A.4.3](#)) was not referenced as an evidence document on the council’s website, though it is referenced in the consultation document.

A.4.2 The Sustainability Appraisal 04/2016 (SD52)

A.4.2.1 There is no change to the assessment of the Morden holiday park (pp. 106-109), or associated green belt, from the 01/2015 version of the SA, so changes to the GB are still absent.

A.4.3 The Green Belt Study 06/2016

A.4.3.1 Changes to the GB boundary at Morden are envisaged in this study, though its conclusions are provisional and the area to be released is not defined.

A.4.3.2 On p. 3 "*This review also looks at proposed development at Morden Park Corner for tourism purposes and a strategic suitable alternative natural green space (SANG). It concludes that the tourism-related development would be contrary to the purposes of the green belt, but could be justified in terms of 'enabling development', as without it, the SANG would not come forward. The SANG is **essential**.*" This statement is inconsistent with the contemporary HRA, and the developments that could not otherwise be supported are not identified. The council was content to remove the Morden holiday park from the LP at the start of the examination via **MM20**.

A.4.3.3 In para. 107 "*...The Habitats Regulations Assessment for the Purbeck Local Plan Part 1 identified that a strategic SANG is **required in this location**.*" In fact, the referenced HRA is not prescriptive about a SANG specifically at Morden Park Corner.

A.4.3.4 There is no consideration of alternatives or other requirements of the NPPF to evidence "exceptional circumstances" in the study (see paras. 108 & 109).

A.4.3.5 Para. 153 contains "*...Release from green belt will also have to be balanced against other planning considerations, for example access to land, its distance from local facilities and services, and **will be subject to public consultation**...*". There was no public consultation on this issue until the pre-submission draft.

A.4.4 Partial Review Options Consultation Report 11/2016

A.4.4.1 Para. 161 (not in relation to Morden) states, "*...However, consultees have stressed that opening up access to Green Belt is not sufficient justification for building on it elsewhere. It is important to stress that the provision of a SANG is to attract residents away from international protected heathland, **it is not intended to be a form of compensation for the loss of Green Belt land**...*" There is similar wording in para. 107.

A.4.4.2 Paras. 477-484 cover the Morden holiday park. Para. 478 says "...*This land is located within the green belt, but the Council considers that the provision of a strategic SANG offers **very special circumstances** that can justify development **within the green belt.***" The general public will be unaware of the technical difference between "exceptional" and "very special" circumstances, but any lay interpretation of this sentence would almost certainly conclude that the development would be inside the GB. This agrees with the technical interpretation.

A.4.4.3 The Pro-Vision consultation response on behalf of the Charborough Estate includes (section 4.0) "*The Estate has agreed in principle to the provision of a strategic SANG, which offers **very special circumstances** that can justify development **in the green belt.** Preferred Option 11 will support Purbeck District Council in planning positively to enhance the beneficial use of the green belt, including providing access, providing opportunities for outdoor recreation, retaining and enhancing the landscape, visual amenity and biodiversity, in line with paragraph 81 of the NPPF.*" At that time, para. 81 of the framework referred to enhancing the use of already-defined GBs.

A.5 The New Homes for Purbeck Consultation 01/2018

A.5.0.1 This last public consultation before the pre-submission stage did not mention Morden holiday park at all, so the public could have concluded that this proposal was no longer part of the plan.

A.5.1 The Consultation Document

A.5.1.1 Morden holiday park was absent from this consultation document, although the removal of GB for other developments was covered. If the SANG provision at Morden was thought to be essential to support the proposed housing options, the consequences of providing it should have been covered.

A.5.2 The HRA 01/2018 (SD75)

A.5.2.1 No change in relation to Morden holiday park since 01/2015.

A.5.3 Other Documents

A.5.3.1 No GB review or SA was listed as an evidence document for this consultation.

A.5.3.2 However, the contemporary Green Belt Background Paper of 01/2018 para. 47 states, “*The Council has not re-appraised the suitability changing Green Belt boundaries at a site being promoted for holiday ‘forest lodges’ at Morden Park Corner. When officers previously assessed whether to alter Green Belt boundaries at Morden Park Corner they gave particular weight to the site promoters proposals to positively manage existing woodland (to enhance biodiversity and remove invasive non-native species), and their plans to deliver a strategic Suitable Alternative Natural Green Space (SANGs) as part of the development. The Council is still completing work with site other promoters on addressing the impacts that further homes across the District will have on European sites. When this work has been completed, and after taking account of the evidence in the Purbeck OAN Update 2017 and recent Habitats Regulations Assessments, the Council will re-assess **whether** there are exceptional circumstances for altering Green Belt boundaries at Morden Park Corner.*” So clearly the plans to release GB at Morden were still uncertain at the time of the New Homes consultation.

A.6 Consultation on the Pre-submission Draft Local Plan 10/2018

A.6.0.1 As noted above, the removal of GB status at Morden was first explicit in the pre-submission draft Local Plan, though not easy to find as there is no text to explain the policy.

A.6.0.2 The supporting Green Belt Study 10/2018 **SD51** included the Morden site, but the exceptional circumstances were not fully established there (paras. 145-157). This document claims in para. 147, “*The SANG will increase public accessibility into this part of the green belt. This increase in public accessibility **will provide compensation to partially offset the proposed loss of green belt land to the holiday park***” which directly contradicts the council’s earlier statements noted in para. [A.4.4.1](#) above.

A.6.0.3 The HRA (**SD03**) does **not** conclude that a SANG at Morden is necessary to support the policies in the LP.

A.6.0.4 See also **SD90**, Green Belt Boundary Changes at Morden 22 July 2019.

Origin3 Ref. 14-047

Dorset Planning Policy
c/o Miss Helen Nolan
Programme Officer
Purbeck Local Plan 2019
Westport House
Worgret Road
Wareham
BH20 4PP

9 September 2019

Dear Sir/Madam

Purbeck Local Plan Review – Additional Documents Consultation (September 2019)

We write to provide Representations to the above consultation. This submission is written at the request of the Inspector, following the August examination hearing sessions in respects of the Purbeck Local Plan Review and the additional documents published by Dorset Council.

This set of representations are written on behalf of Halsall Homes. Their specific land interest relates to land at Steppingstones Field, Stoborough which they are promoting for residential development. A site location plan is attached at appendix 1.

Background

The Purbeck Local Plan Review was submitted for examination during January 2019. Following the first set of hearings during July 2019 the Council were tasked with a series of action points. Additional documents were submitted to the examination before the second round of hearings which took place during August 2019. In the interest of fairness the Inspector agreed to provide participants who attended the relevant hearing sessions the opportunity of submitting written comments on these further documents.

Main Modifications (SD14)

Housing Need

Purbeck District Council did not calculate the local housing requirement applying the standard methodology described in national planning policy and guidance within the submitted Purbeck Local Plan Review document.

The submitted Purbeck Local Plan indicates that the minimum annual housing need figure for Purbeck is 168 dwellings per annum (dpa). However, following discussions at the hearings, the Inspector expressed the view that using the most up-to-date information at the time of submission would result in a minimum annual local housing need figure of 180 dpa.

Dorset Council accepts that the standard method establishes a minimum annual housing need figure for Purbeck of 180 dpa and that, as a minimum, the council should aim to make provision for this level of need in the Purbeck Local Plan.

MM45 and MM46 set out that using the standard methodology for calculating housing need the Council has calculated an annual need for 180 new homes per year. For the period covered by the Purbeck Local Plan from 2018 to 2034 this equates to the need to provide 2,880 homes across the District. Modifications proposed through MM45 and MM46 in respect of the overall housing need figure are supported. These amendments ensure that the Council's housing strategy has been positively prepared to meet local housing need as required by national planning policy.

Stoborough

MM33 identifies Stoborough as a 'Local Service Village' which is a settlement needing some growth to sustain vital rural services such as the village school. This main modification is supported.

Stoborough fulfils a role of a local hub and provides access to a number of the key facilities including a primary school, village hall, petrol station, recreation ground, public house and has a regular bus service enabling access to services and facilities further afield. Additional housing growth should be directed to Stoborough to support the existing services and facilities which will ensure the vitality of the community is sustained.

'Small Sites' Policy (Ref. H8)

MM53 seeks to amend Policy H8 to restrict the number of new homes permitted on any single small site adjoining a local service village to a maximum of 15 dwellings. This is not supported.

SD93 sets out that Policy H8 has been modified to provide greater direction around screening for likely significant effects on European sites (which includes a greater restriction on the number of homes permitted on small sites adjoining lower order settlements which it is stated will enable greater opportunity to take account of any in-combination effects from small sites) and when completing appropriate assessment.

It is unclear what methodology has been followed in amended Policy H8 to include maximum site caps per settlement tiers. These figures appear arbitrary and are not justified. Paragraph 35 of the NPPF sets out that local plans are to be found 'sound' if they are justified and based on evidence.

We are not aware of any evidence which suggests that a 'small site' coming forward above the proposed maximum site cap at the relevant settlement tier would have more of an impact compared to a site below that of the proposed maximum site cap from an ecological perspective.

Furthermore, it is prudent to note the current guidance set out in the Dorset Heathland Planning Framework (2015-2020) Supplementary Planning Document which outlines indicative thresholds for scales of development and the required heathland mitigation. For larger sites of approximately 50 or more dwellings bespoke mitigation through SANG delivery would be required. For sites below the indicative threshold of 50 dwellings mitigation could be provided through a contribution (either S106 or CIL) towards mitigation through HIP provision. The thresholds contained in current guidance therefore do not reflect that of the revised emerging 'small sites' policy.

The Council's 'Small Sites' policy intends to permit new homes adjoining the relevant settlements with the notion that the number of homes on each small site will reflect the specific context enabling a judgement to be made. The imposition of these maximum site caps pre-determines the scale of growth appropriate which does not have regard to site specifics or local context and does not take into consideration development viability which could lead to barriers to delivery.

The imposition of a maximum housing figure per small site creates a conflict with the NPPF as it would not allow for any new residential development, no matter how sustainable, above the maximum figure. Furthermore, the individual site caps may prohibit the most suitable sites from being developed, and lead to less suitable sites coming forward and could lead to the ineffective use of land at sustainable locations, where sites cannot deliver to their full potential. This conflicts with the approach advocated in the NPPF, which sets out that Plans should be positively prepared.

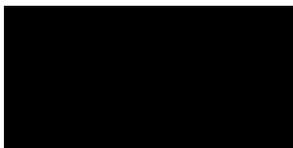
It is recommended that the 'Small Sites' policy should reflect the fact that each potentially suitable site is different. Policies contained within the Purbeck Local Plan Review should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change as set out within the NPPF (para. 11). The 'Small Sites' policy should therefore not include a maximum housing figure per site instead sites should be considered on their individual merits and on a case-by-case basis.

Criteria 'b' of the policy states that "individually and cumulatively, the size, appearance and layout of proposed homes does not harm the character and value of any landscape or settlements potentially affected by the proposals".

The wording 'homes does 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.

I trust the above is of assistance. In the meantime if any further assistance or information is required please do not hesitate to contact me.

Yours sincerely,



Alexander Cave

Planner

T: 0117 980 4900

E: alex@origin3.co.uk



proj: 14-047 drg: 201 date: 12/12/2018 rev: A

ORIGIN3
 Tyndall House
 17 Whiteladies Road,
 Clifton, Bristol,
 BS8 1PB

0117 980 4900
 www.origin3.co.uk
 info@origin3.co.uk



Steppingstones, Stoborough Application Boundary

Halsall Homes Ltd

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Lytchett Matravers Parish Council

Council Office, Vineyard Close, Lytchett Matravers BH16 6DD
Parish Clerk: Tel: 01202-624530; email: lytchettmatravers@dorset-aptc.gov.uk

SD92: Addendum to Sustainability Appraisal 2019 [SD02]

September 9, 2019

Following my discussion with Frances Summers, Senior Planning Policy Officer, I have the following comments to make.

Our concern is that document which is an 'Addendum to Sustainability Appraisal 2019' has been put together from a very limited perspective. Many sites were put forward throughout the district, but in respect of Lytchett Matravers just one site has been selected for inclusion as a potential site for 3,557 homes. This even though this site, along with many others around Lytchett Matravers, were previously rejected as unsuitable.

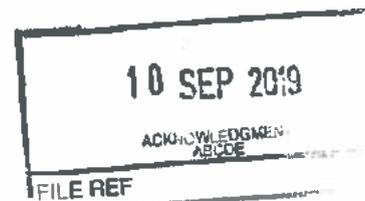
It has been explained that that figure is a theoretical maximum and would likely be much less. What is the purpose of this exercise if the figures are unrealistic? This is entitled a 'Sustainability Appraisal'; how could a village of around 1,600 homes possibly sustain an influx of 3,557 homes?

One of the core principles of the Green Belt is to minimise coalescence of settlements. The use of this site (Bere Farm +) would fill the gap between Lytchett Matravers and Lytchett Minster and would clearly trample all over that Green Belt principle.

I would also point out that, although adjacent to Lytchett Matravers, this site is in the parish of Upton and Lytchett Minster and have accordingly copied them in.

Regards, Cllr. Alf Bush

Chairman, Lytchett Matravers Parish Council



Purbeck Local Plan Examination Representor Response to Additional Council Evidence Documents

On behalf of Wyatt Homes
(Respondent: 1190024)

September 2019



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Client

Wyatt Homes

Our reference

WYAW3012, WYAW3013 and WYAW3014

September 2019

1. Introduction

- 1.1 Following the August hearings sessions on the Purbeck Local Plan and in accordance with the emails from the Programme Officer received on 12th and 20th August, please accept the following as comments to the Examination on behalf of Wyatt Homes (representor ref: 1190024).
- 1.2 The comments below focus entirely on a number of documents that were published by Dorset Council shortly before the August hearing sessions. We have not repeated here any aspect of our previous representations or examination statements and therefore, these comments should be read alongside those previous submissions to the Examination.
- 1.3 We have not sought to comment on every document published prior to the August hearings, but have focused on those where our client has particular concerns. In summary, the documents we have provided comments on are as follows:
 - SD85 Housing Need
 - SD92 Addendum to the SA
 - SD95 Proposed Changes to Care Provision
 - SD97 Key Viability Issues Summary
 - SD14 Updated List of Main Modifications (August 2019 version)

2. Response to ‘SD85 Housing Need’

Assessing Housing Need Using the Standard Method

- 2.1 As set out within sections 2 to 4 of SD85, we agree that the level of housing need set out within the Purbeck Local Plan (PLP) as submitted does not represent a correct interpretation of relevant national planning policy and guidance. We agree that the ‘local housing need’ figure for the Purbeck area should be increased, either to 180 or 185 dwellings per annum (dpa), as set out in SD85.

Dorset Council Concerns about Increases in the Housing need Figure

Local Economic Aspirations

- 2.2 Our previous submissions have argued that the significant level of strategic employment development that is allocated within Purbeck (at the Dorset Innovation Park and at Holton Heath) necessitates an additional level of housing delivery for the plan period, to support the jobs growth and economic development that is anticipated.
- 2.3 Whilst we accept that the jobs growth envisaged is strategic in nature and not only to serve the local economic growth needs of the Purbeck area, we do not agree with the Council’s assertion in paragraph 6.10 of SD85 that it would not be appropriate to make provision for additional housing within the PLP to support the strategic employment development. On the contrary, the PLP remains the only opportunity prior to the adoption of the Dorset Unitary Local Plan in 2023, or possibly later, to address the housing growth that the anticipated employment development will require.
- 2.4 The Council refers to additional housing proposed at Crossways by the West Dorset, Weymouth and Portland Options document. However, that plan will not be taken forward and so there is no certainty that the further strategic growth referred to in that document will be planned, let alone delivered. Therefore, we consider that a proportionate increase in housing need is required within the PLP, specifically to support the strategic employment growth allocated within that plan. This increase in housing numbers is not only appropriate, but is essential to avoid unnecessary delays in facilitating employment growth which could harm the future economic development of the south of Dorset.

Unmet Need from Neighbouring Areas

- 2.5 We continue to disagree with the Council’s assertion in paragraph 6.14 of SD85 that it is not appropriate to seek to meet an element of the unmet need from the Bournemouth, Christchurch and Poole and New Forest areas through the PLP. Whilst it may be a ‘neater’ solution for the Council to delay this decision-making to the Dorset Unitary Plan, that approach is not consistent with national planning policy which clearly seeks for unmet needs to be dealt with and not deferred¹.
- 2.6 The assertion within paragraph 6.17 that additional homes within Purbeck would not be effective in addressing the unmet needs within the Christchurch area fails to recognise that both Purbeck and the whole of the Bournemouth, Christchurch, Poole

¹ See in particular NPPF paragraphs 35 and 60.

(BCP) area sit within the Eastern Dorset Housing Market Area, as evidenced through various iterations of the Council's own SHMA. Indeed, the Statement of Common Ground (SD10a) clearly demonstrates that other parts of the BCP area are also likely to have significant levels of unmet need. The reference during the Examination hearings to Christchurch reflects only that the unmet needs there were defined and expressed to clearer degree than is the case with Bournemouth.

- 2.7 The Council claims at paragraph 6.20 that it would be difficult to address unmet needs from neighbouring areas as the Sustainability Appraisal has been prepared on the basis of meeting only Purbeck's needs. We do not accept that this is a valid excuse to avoid complying with national planning policy. As the Council states later in SD85, SA testing for much higher levels of growth has previously been undertaken in support of the 2016 Partial Review Options consultation².

Options for Meeting an Increased Housing Need Figure

- 2.8 We would point out that paragraph 8.21 contains a factual error in that the submitted PLP envisages 55³ units at the north eastern edge of Lytchett Matravers rather than 45 as stated in SD85.
- 2.9 Whilst it is true that the boundaries of the two sites at the north east of Lytchett Matravers considered within the 2016 options consultation are the same as those proposed within the submitted PLP, it is important to note that the 2016 options proposed 90 dwellings at these sites, as opposed to 55 now being proposed. The difference has been informed by the technical and design work undertaken by Wyatt Homes. However, the higher number previously proposed demonstrates that the Council did at one point consider that a higher level of homes could be sustainably delivered at the northeast of the village.
- 2.10 Achieving this higher level of housing delivery would require alteration to the boundaries of the Blaneys Corner site, as we have previously proposed within our representations. It is important to note from those representations that the proposed larger Blaneys Corner site was fully tested in terms of impact on landscape and on the Green Belt by Hankinson Duckett Associates⁴. This study concluded that the release of the additional area would not cause any significant adverse impact to the Green Belt and indeed would allow for a greatly improved robust and permanent boundary to the Green Belt.
- 2.11 In light of the points above, we do not agree with the Council's statement in paragraph 8.21 that there is only additional capacity for 10 dwellings at the north east of Lytchett Matravers, should the housing need figure be increased. We would argue that the additional capacity should be 35, or possibly 45 if the additional site for 10 dwellings referred to by the Council were also included.

² See paragraphs 8.1 and 8.2 of SD85.

³ 30 at Land East of Flowers Grove and 25 at Blaneys Corner.

⁴ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/landscape-and-greenbelt-study-blaneys-corner.pdf>

Implications for the Spatial Strategy of the Purbeck Local Plan

- 2.12 Section 9 of SD85 highlights that it will be difficult to accommodate any significant additional level of housing at the three largest settlements within the Purbeck area. We agree with this conclusion. However, we do not agree with the statement in Paragraph 9.3 that, given the amount of housing already proposed at the key service villages, it is not considered appropriate to allocate more land at these settlements.
- 2.13 The key service villages, including Lytchett Matravers, fall within the second tier of the settlement hierarchy. They are, by definition, service centres and therefore represent sustainable locations for development. Indeed, in relation to Lytchett Matravers, we would point to the following text within the 2016 options consultation document, which the Council has confirmed was subject to SA testing:

“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.”

and in relation to transport infrastructure, it states:

“Given that traffic flows would be likely to be predominantly in the direction of the conurbation, development here would have less of an impact on the A351, compared with development elsewhere in the district. Transport modelling shows that this level of development would be acceptable from a transport perspective.”⁵

- 2.14 We consider therefore that if the case for increasing the level of housing need beyond 180 / 185 dpa is accepted, this could be achieved through extended or additional site allocations focusing on the key services villages, including Lytchett Matravers, without undermining the Council's overall spatial strategy.

⁵ Purbeck Local Plan Partial Review Options (June 2016) page 33.

3. Response to ‘SD92 Addendum to the SA’

Assessment of Growth

Upton

- 3.1 Paragraphs 80 to 88 of SD92 cover Upton. There appear to be several inaccuracies within the text as well as the assessment table.
- 3.2 At paragraph 84 it is made clear that SHLAA/0098 is available for a 65 bed care home and additionally for employment development. However, the last bullet point of the paragraph states that none of the employment sites are available. This is misleading as our client’s site (SHLAA/0098) is currently available, were it to be required for employment development use.
- 3.3 Paragraph 85 states that in any scenario where increased development at Upton is planned (beyond the currently proposed 90 dwellings), employment provision is likely to be unaffected. Again, this is clearly not the case as our client’s site is available for both elderly persons accommodation and for employment provision.
- 3.4 In light of the above, we consider that the assessment of a ‘neutral’ effect of additional growth at Upton on ‘widening employment opportunities’ cannot be correct as employment provision is specifically being promoted, as noted in paragraph 84. We consider that this assessment should show a ‘minor positive’ effect at the very least.
- 3.5 We also do not agree with the ‘neutral’ assessment for the 4th objective⁶. The ability to include additional employment provision will provide an overall benefit under this objective for all residents of Upton, facilitating a greater number of residents to use sustainable means to access employment. Again, at the very least, a ‘minor positive’ effect would be a more appropriate assessment here, as has been shown for Moreton Station.

Lytchett Matravers

- 3.6 Paragraphs 103 to 109 cover Lytchett Matravers. Again, there are a number of issues we need to raise here.
- 3.7 Under paragraph 106, it is stated that the only available site for additional growth at the village is SHLAA/0041. However, if one looks at the most recent SHLAA (SD22) it is clear that this is not the case. Site SHLAA/0024 is also assessed in SD22 as being suitable for residential development and is available. This site includes the proposed Blaneys Corner allocation in addition to the further land being promoted by Wyatt Homes. The assessment within SD22 states simply that, whilst the site as a whole may be suitable, the Council does not consider that there are ‘exceptional circumstances’ to release the eastern part of the site from the Green Belt. Whilst this may be the case, it is inconsistent therefore for SD92 to consider SHLAA/0041 (also within the Green Belt) for potential additional growth at Lytchett Matravers, but at the same time not consider the eastern portion of SHLAA/0024, which does not currently benefit from a

⁶ Help everyone access basic services, reduce the need to travel by car and encourage cycling, walking and use of public transport

proposed site allocation. We therefore consider that SHLAA/0024 should be listed under paragraph 106 with an additional capacity of 35 dwellings.

- 3.8 In terms of the SA assessment for Lytchett Matravers we do not consider that the ‘major negative’ effect for the 7th objective is justified⁷. This seems to have been applied on the basis of the statement in paragraph 108 that:

“Release of the green belt would have to be facilitated by the consideration of exceptional circumstances and if built on, development here could impact the landscape and townscape.”

- 3.9 The reference to an impact on landscape and townscape is unjustified and illogical. There is no evidence to justify such a conclusion. Indeed, Lytchett Matravers is nowhere near any protected landscape and even site SHLAA/0041 is some distance from the Lytchett Minster Conservation Area. There is no basis on which to conclude that even a very significant increase in the level of growth at this village would give rise to a ‘major negative’ effect. Even if the assessment had consideration to the potential scale of growth compared to the existing settlement size, we do not understand why a similar negative effect assessment has not been applied to Moreton Station and Wool, where the assessment for the 7th objective is shown as ‘neutral’ in each case.
- 3.10 Finally, we question the justification for the ‘major negative’ effect assessment for the 8th objective⁸. For each of the other settlements assessed (with the exception of Bovington and Corfe Castle where no additional capacity for development was found) a ‘minor negative’ effect was the outcome. However, for Lytchett Matravers this was increased to ‘major’ without any explanation or justification.

Overall Assessment and Recommendations

- 3.11 When considered overall, and as we have shown above, the effect of the way in which SD92 has been drafted has been to make additional growth at both Upton and Lytchett Matravers appear to be less sustainable than it would otherwise be. Indeed, the overall recommendations at paragraphs 139 and 140 seem to confirm this by making reference to ‘green belt’ which is a planning policy designation and not one that should be considered by sustainability appraisal.
- 3.12 It seems clear to us that the SA Addendum has set out to retrospectively support the Council’s preference for directing any additional housing growth, beyond that already planned for, to Wool and Moreton Station rather than to the east of the Purbeck Area. Our comments have shown that there is clear potential for at least some additional growth at both Lytchett Matravers and Upton, focussing on suitable, available and sustainably located sites.

⁷ Protect and enhance Purbeck’s unique landscape and townscape, and cultural and historical assets.

⁸ Minimise all forms of pollution and consumption of natural resources.

4. Response to ‘SD95 Proposed Changes to Care Provision’

- 4.1 We note the evolving strategy of the Council, moving away from residential ‘care homes’ towards a model that relies mainly on ‘Extra Care’. We also note and accept that there is additional need for purpose-built accommodation for older and disabled people that requires some level of care provision, but less than that envisaged within ‘Extra Care’ facilities.
- 4.2 The concern our client has is in the way the Council is seeking to meet the need for this specialist purpose-built accommodation through an arbitrary approach involving requiring that 20% of all homes within the housing allocations identified within the PLP should come forward to meet these specialist accommodation needs.
- 4.3 It can be seen from paragraph 4 of SD95 that the 20% target derives from a crude calculation of the proportion that the need for this type of development represents, when considered against the overall level of residential development that was proposed when the SHMA evidence was drafted.
- 4.4 It appears clear to us that the new national planning guidance does not include anything to suggest that councils facing a general anticipated need for accommodation suitable for older people should respond by requiring a prescriptive proportion of specialist housing to be provided from every allocated site. What the national guidance does say is that:
- “They could provide indicative figure or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.”⁹*
- 4.5 Whilst SD95 indicates that there would be some flexibility in how such development would come forward within each allocation site, it is clear from this document and also from the Lichfield’s document referenced in footnote 4 of page 1 of SD95, that the form of development envisaged is of the ‘Sheltered Housing’ type, where a manager (or warden) service is provided on site on a regular basis but where no registered personal care is provided.
- 4.6 Our client is concerned that this approach is not likely to be viable or deliverable on all of the allocated sites, particularly on the smaller sites such as at Upton and Lytchett Matravers. There is also concern that this requirement may lead to poorer outcomes in terms of the design and character of the schemes delivered at these sites.

Viability and deliverability concerns

- 4.7 We are concerned about the viability of the proposed 20% requirement for purpose-built accommodation, both from the initial delivery perspective and also from the perspective of the ongoing operational viability of the type of development envisaged.

⁹ NPPG ID: 63—06-20190626 (Turley emphasis added).

- 4.8 In terms of the delivery of the schemes, we do not consider that the 20% requirement has been sufficiently tested for its impact on scheme viability. This appears to be confirmed within the Updated viability evidence (SD35) which states, in relation to the requirement for 20% of market and affordable homes to come forward as specialist accommodation for the elderly:

“To our knowledge there is no real experience to date of how the inclusion of such a mix works within sites, other than the larger allocated sites of a few hundred homes or more. We suspect that viability and workability in a wider sense would be highly dependent on a range of factors starting with local demand/need for a particular type of specialist housing and/or care related provision and this may come down to a combination of practical matters rather than viability alone. Without knowing how this might work out we have been able only to make some high level assumptions within our current site allocation high-level appraisals...” (SD35, Paragraph 3.2.32).

- 4.9 The impact of this proposed requirement on the site allocations is therefore, at best, uncertain. We do not consider that this approach is consistent with national planning policy and guidance which seeks to ensure that all policy requirements and burdens placed on development are appropriately assessed in terms of their likely financial impact on development.
- 4.10 There is also no clear evidence of demand for this type of development from private sector operators or registered providers. The concern here relates to the small size of our client’s site allocations, compared to the larger allocations at Moreton and Wool.
- 4.11 Our broad experience indicates that sheltered accommodation schemes normally come forward through specialist providers which use a carefully developed business model that involves developments of about 60 units which provides a scale to support some basic communal facilities and the on-going warden support service. In our experience sheltered accommodation schemes of less than 30 or 40 units rarely come forward for development. This is understandable given the high on-going costs of site management, communal facilities and the suchlike which make small schemes offering these uneconomic to run in the long-term. Where smaller specialist accommodation schemes do come forward, they tend to lack the level of care, management and communal facilities and are thus neither attractive to commercial providers, nor to potential residents who may not be achieving the level of support and facilities they require.
- 4.12 The table below indicates, for the four allocated sites in which our client has an interest, how many specialist accommodation units the 20% requirement within Policy H9 would achieve. It can be seen that even for the two largest sites, this would be less than 20 units, with only 5 or 6 units on each of the smaller sites at the north east of Lytchett Matravers. Sheltered accommodation schemes of this scale would not fit the prevailing model for these developments and are not likely to be considered favourably by the specialist or registered providers as the small scale will not support communal facilities or the warden support services.

	Upton		Lytchett Matravers	
	Policemans Lane	Wareham Rd	Flowers Drove	Blaneys
Allocated level of dwellings	90	95	30	25
Affordable (Purpose-built)	7.2	7.6	2.4	2
Market (Purpose-built)	10.8	11.4	3.6	3
Total Purpose-built (20%)	18	19	6	5

Scheme character and design concerns

4.13 Alongside the concerns about viability, we also consider that achieving the 20% requirement for specialist, purpose-built accommodation could have adverse impacts on the design and character of small and medium-sized housing schemes such as those in which our client has an interest. At both Lytchett Matravers and the south western rural edge of Upton it is by no means clear that developing specialist sheltered accommodation would be consistent with the prevailing local character. The small size of the schemes could make it more difficult to achieve a positive contribution to local character where sheltered schemes need to be incorporated. This concern is greatest for the two smallest sites, both of which are in close proximity to existing dwellings in north eastern Lytchett Matravers.

Proposed Modifications to the Purbeck Local Plan 2019-2034

4.14 SD95 sets out a series of proposed modifications as a consequence of the revised approach. We would comment on these as follows.

Policy V1: Spatial strategy for sustainable communities

4.15 The reference to Lytchett Matravers and Upton should be deleted in light of the reasons highlighted above. It is not certain that specialist purpose-built accommodation can be achieved at the small and medium-sized schemes proposed at these locations.

Policy H9: Housing Mix

4.16 We consider that the proposed changes to Policy H9 do not go far enough and that the whole of the third paragraph (beginning “*For the identified housing allocations...*”) should be deleted.

4.17 If the above change is not acceptable to the Council, we propose that the third paragraph within Policy H9 be modified as follows to reflect the range of concerns above about delivering specialist purpose-built accommodation on smaller housing schemes. This modification reflects our experience that 30 units of specialist accommodation would be an absolute minimum scale for such schemes to achieve long-term viability:

“For the identified housing allocations in the Purbeck Local Plan delivering at least 150 dwellings, the Council will ~~expect~~ encourage 20% of the market and affordable housing mix to provide specialist purpose built accommodation or adaptable homes ~~for the elderly~~. Where such provision would provide a single storey home this would contribute to the above requirement at criterion b.”

5. Response to ‘SD97 Key Viability Issues Summary’

- 5.1 We note that a limited level of engagement between the Council’s viability consultants and the promoters of the residential allocations within the PLP is currently underway and will no doubt be informed by SD97. Therefore, we will keep our comments on this document to a minimum until that engagement is concluded.

Viability implications of the requirements within Policy H9

Self-build plots

- 5.2 On page 11 of SD97, it shows that Turley previously raised a concern that the 5% self-build plots requirement of Policy H9 (Housing Mix) had not been modelled within the Council’s viability evidence. We are disappointed that the response to this point provided in SD97 simply repeats the same unjustified assumptions that can be found within the Viability Study Update 2018 (SD35).
- 5.3 We remain concerned that the Council’s viability work contains no evidence or justification to support the assumption made that self-build plots will have a ‘neutral impact’ in viability terms¹⁰. It is also of concern that the authors of SD35 appear to have misunderstood the Council’s proposed policy requirements as they refer in SD35 to “Custom and Self-build”, whereas the Council is proposing to require that the 5% target applies only to “Self-build”. This is important as there is a significant difference in the potential viability of custom-built homes compared to the provision of self-build plots. As we covered in our previous submissions, the relevant legislation, as well as national policy and guidance, all refer to “self-build and custom-build housing” and so we see no justification for the Council to limit the requirement to ‘self-build plots’.
- 5.4 Further, we are concerned that the authors of SD35 profess to have limited experience in this form of development to date and they felt compelled to caveat that their advice on self-build is subject to demand for plots of this type¹¹. Given this lack of experience and uncertainty and the lack of any modelling of self-build plots within the viability appraisals undertaken, we see no basis for concluding that that the provision of 5% self-build plots will have either a positive or even a neutral impact on overall site viability.

Specialist Purpose-built accommodation for the elderly or disabled

- 5.5 Turley also raised a concern, as shown on page 11 of SD97, that the full plan policy costs had not been included within the viability appraisals for the site allocations. A key element of these costs is the 20% requirement for the provision of specialist purpose-built accommodation for the elderly or disabled, as currently required by Policy H9.
- 5.6 As we covered above in relation to SD95, this requirement has also not been modelled within the viability appraisals. This is concerning given the significant costs, build specifications and marketing differences between this sort of specialist

¹⁰ SD35: Paragraph 2.6.12

¹¹ SD35: Paragraph 3.2.28

accommodation and general needs housing. Indeed, the authors of SD35 questioned whether such development uses would be likely to come forward within the relatively small residential allocations that are impacted by this policy requirement. They stated:

“To our knowledge there is no real experience to date of how the inclusion of such a mix works within sites, other than the larger allocated sites of a few hundred homes or more.” (SD35 - Paragraph 3.2.32).

- 5.7 Overall, we remain concerned that a number of key issues and inadequacies in the Council’s viability evidence remain unaddressed. If this remains the case once the plan is adopted, with the relevant policy requirements still in place, we anticipate potentially significant financial viability barriers that will need to be overcome in implementing at least some of the PLP’s site allocations.

6. Response to ‘SD14 Updated List of Main Modifications’

6.1 We wish to make comments on a number of the proposed Main Modifications within SD14 as follows.

MM1 – Policy V1: Spatial Strategy for Sustainable Communities

6.2 As we have referred to above, in relation to SD95, we consider that the reference to Lytchett Matravers and Upton in Part 2 of Policy V1 (as amended) should be deleted. Please see Section 4 of these comments for further details.

MM48 – Policy H3: New Housing Development Requirements

6.3 MM48 proposes to insert a new clause after the existing clause d. This requires the recreational impacts of development at Lytchett Matravers and Upton to be mitigated in accordance with Policy E9.

6.4 We do not consider that it is necessary to create this new clause simply to signpost other parts of the PLP. However, if this is considered absolutely necessary, it should also signpost Policy I1b which is relevant and is proposed to be inserted to cover the role of the Recreation in Poole Harbour SPD.

6.5 The proposals to amend clause g of Policy H3 are broadly supported, but they do not go far enough. In addition, ‘superfast broadband’ should be defined within the policy or supporting text. Ofcom currently defines ‘superfast broadband’ as connection speeds in excess of 30 Mbps. We are concerned that the Ofcom definition of the term could change over time as national average internet speeds increase. However, there is no certainty that these higher speeds will be achievable in the Purbeck area during the plan period.

MM54 – Policy H9: Housing Mix

6.6 As stated above under SD95, we consider that the proposed changes to Policy H9 do not go far enough and that the whole of the third paragraph (beginning “*For the identified housing allocations...*”) should be deleted.

6.7 If the deletion of the third paragraph of Policy H9 is not acceptable to the Council, we propose that this be modified as follows, to reflect the range of concerns about delivering specialist purpose-built accommodation on smaller housing schemes:

“For the identified housing allocations in the Purbeck Local Plan delivering at least 150 dwellings, the Council will ~~expect~~ encourage 20% of the market and affordable housing mix to provide specialist purpose built accommodation or adaptable homes, ~~for the elderly~~. Where such provision would provide a single storey home this would contribute to the above requirement at criterion b.”

6.8 This proposed modification reflects our experience that approximately 30 units would be an absolute minimum scale for such schemes to achieve long-term viability. Therefore, a 20% requirement would require a scheme of at least 150 dwellings to achieve this minimum size for the specialist purpose-built accommodation element.

6.9 It should also be noted that the supporting text for Policy H9 also requires modification to be consistent with the revisions proposed both by the Council and by ourselves. As currently drafted, the supporting text conflicts with the revisions to the Policy.

Turley Office
6th Floor North
2 Charlotte Place
Southampton
SO14 0TB

T 023 8072 4888

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 **additional submission documents provided in advance of the hearings for Matter E: Housing.**

The documents that we wish to comment on are:

- SD95: Proposed Changes to Care Provision
- SD97: Key Viability Issues Summary (August 2019)

SD95: Proposed Changes to Care Provision

We welcome some of the amendments to this section whereby the changes promote specialist purpose-built accommodation for older people.

With regards to the proposed changes to care provision the council seem to be relying on some guidance from Lichfield’s to provide clarification on. This document itself comes with a disclaimer to say that:

“This publication has been written in general terms and cannot be relied on to cover specific situations. We recommend that you obtain professional advice before acting or refraining from acting on any of the contents of this publication.”

It is therefore clear that this document should not be cited within a planning policy document. **Therefore to prevent any confusion in application of policy, reference to the Lichfield’s document can and should be withdrawn in favour of the PPG definition. This could be done by the following amendment to paragraph 2 of SD95:**

*“it is where people have access to personal care and support services available up to 24 hours per day, their own front doors and tenancy or even ownership rights. **Planning Practice Guidance defines Extra Care Housing as “This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live***

independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre”

We would then advise then deleting reference to the footnotes where this references the Lichfield’s documents as well.

SD97: Key Viability Issues Summary (August 2019)

From the viewpoint of the Consortium, the definition of affordable housing for specialist housing proposals for older people should be differentiated from mainstream housing proposals. Proposals for specialist housing for older people must therefore be differentiated from general needs affordable housing targets in light of need and balanced with the clear need to actually incentivise the delivery of this housing given the historically low delivery rates achieved.

Profit

The basic way that risk is reflected in viability appraisals is by employing a notional 20% ‘profit’ within the appraisal (based upon the current industry wide standard). However, it is very important to understand that the 20% is the bare minimum for specialist housing, on the basis that the risk associated with the affordable housing cost is known. In fact, there are arguments to suggest that based upon risk and extremely slow sales back periods that this notional figure should be higher. If there is a risk that the affordable housing cost might rise significantly, the risk profile becomes unacceptable to both the developer and in many cases the funder. Specialist providers of accommodation for older people are different from open market housing providers for the following reasons:

1. No Help to Buy or other incentives;
2. Restricted age group and therefore pool of purchasers;
3. Very slow sales rate leading to risk and exposure to the market over several years and market cycles;
4. As a result of 3, economic breakeven can take several years vs. say 15-18 months for a general needs flatted scheme of a similar scale;
5. Cannot phase scheme and must be 100% complete and ready before the first sale;
6. Do not tend to achieve sales off plan due to the nature of the purchaser who normally insists on viewing the completed scheme before committing to purchase
7. Purchasers cannot avail of mortgage finance like the rest of the market and must in general sell an existing asset which further delays sales.

Specialist Accommodation for older people is therefore different in terms of risk profile. For this reason, 20% return has been agreed in every viability assessment of retirement housing in the last two years across the country and it would be highly unusual to adopt a different rate for Purbeck alone.

The response in respect of sales values is weak with no justification. DSP continues to rely upon the McCarthy and Stone high end ‘Ortus’ brand at Swanage to justify values across the region. This is unrepresentative of the product provided, generally, by members of the consortium. In particular, the values across the district have not been reflected in the modelling.

Mix

While the viability consultants appointed by the Council have responded to state that it is their experience that the mix is reflective of their experience it is respectfully submitted that the Consortium is responsible for delivering circa 90% of England's specialist owner occupied retirement housing, and to ignore our experience of the mix that the market requires is very short sighted. Our consideration of mix is a response to the consortium's demand profile across the country and reflects many years' experience of providing retirement apartments.

Sales Rates

Dixon Searle fail to confirm whether they take on board the 1.3 sales per month. This is a conservative estimate; one of the members of the consortium has an average sales rate of 1.28 sales per month for 39 schemes in the South West since 2012. It is therefore disappointing that it is not clear what sales rate has been applied.

Gross to Net

It would appear that our comments the allowance for common areas, the 'gross to net calculation', has been ignored. Saleable areas only represent between a maximum of 75% of the overall floorspace of typical retirement living apartment blocks and usually in the region of 70%. This has a significant effect on the cost providing retirement housing which, it should be understood, is different of mainstream housing.

Benchmark land value

There has been no response to the initial points made in the consortium's submissions that the viability consultants appointed by the Council have not considered existing residential values as a benchmark and merely looked at industrial land values. While the justification for this is that the provision will be made on allocated land in our experience the vast majority of the consortium's sites are 'windfalls' and therefore benchmark land values should be further scrutinised.

For the specific site allocations, given the change from previous use including a care home to now including specialist accommodation for older people it is clear that the new uses have not been reassessed for viability purposes which means that the allocations may not be deliverable.

Conclusion

As evidenced by our previous submissions, the Policy as drafted would not be effective in addressing the housing needs of older people as it would inhibit the ability of developers to deliver and has the effect of not recognising the priority needs to be addressed by applying the same policies for affordable housing.

We are still seriously concerned that the evidence base upon which the Policy is justified is flawed and misguided. A separate submission in this regard has been 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.

Arguments about the level of affordable housing are consistently the reasons for delays to the planning system. By applying a more realistic target for affordable housing on sites for retirement housing this will significantly reduce planning time and help achieve a flow of housing for older persons housing and thereby more effectively meet identified needs. Setting a separate target for retirement housing is wholly in line with National Planning Practice Guidance which states that *“different requirements may be set for different types or location of site or types of development”*.

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.

FAO: Mrs Helen Nolan
Programme Officer
Purbeck Local Plan
Dorset Council
Westport House
Worgret Road, Wareham
BH20 4PP

10th September 2019

Your ref: Purbeck Local Plan Examination – Matter E: Housing
Our ref: AB/3056

Dear Mrs Nolan

Re: Further Written Submissions in respect of the Additional Information Presented to the Purbeck Local Plan Examination – Matter E: Housing, Issue 3 on behalf of Westcoast (Purbeck) Ltd; Representee ref. 1191219

The following letter has been prepared in support of our final written submissions in advance of the recommencement of the Purbeck Local Plan Examination hearing sessions in October 2019. The representation is made on behalf of Westcoast (Purbeck) Ltd (1191219) in respect of the land within their control at Binnegar Hall, Worgret Road, East Stoke, BH20 6AT.

A detailed comment is provided below in respect of the Council's 5-year housing land supply and its suggested delivery trajectory which has again changed. We have repeated comments on some of the earlier evidence as it is contextual to the discussion of the Council's new evidence as set out within the Housing Trajectory Worksheet which has now been added to Examination Document **SD87** both of which were provided during the course of the examination.

It is important to see how the 5-year supply position has changed and been repeatedly reworked with different figures arising at each stage. This is indicative that the assessment of the Council's housing delivery has not been carefully considered or proactively prepared.

Issue 3 – 5 Year Housing Land Supply

- (a) Is it robustly demonstrated that at adoption the Plan will deliver a 5-year housing land supply and that this can be maintained throughout the plan period calculated in accordance with National policy and guidance, taking account of past delivery and performance and applying the appropriate 10% or 20% buffer?**
- (b) What is the current position with regard to housing land supply?**
- (c) Is there a 5-year supply?**
- (d) How has this been calculated?**

3 (a)

The Council has submitted that, at the time of the examination within its hearing statement for Matter E, it considers it can demonstrate 6.8 years housing land supply.

It is our Client's position that the Council cannot currently demonstrate a 5-year housing land supply. The delivery of the proposed allocations will seek to address this housing supply position; however, the Council has not allocated sufficient sites to enable its overall housing needs to be appropriately met as we have discussed during the course of the examination; far too significant a reliance is made upon Windfall Development.

It is also questioned whether or not, even if the plan were adopted, the Council will be able to demonstrate a 5-year supply having regard for the rate of delivery of the proposed allocations and that the Council has sought to upon significant sources of windfall supply that are neither reasonable or justified.

It is relevant to consider the change in the Council's position during the course of the examination and the figures advocated for.

3 (b) Purbeck 5-Year Supply - Current Position

If we take in to account the Standard Methodology need as a starting point at 180 dwellings per annum, as has been discussed during the course of the Hearing Sessions; the Council's 5-year supply position, without the adoption of the local plan will look as follows:

The housing need (e) is determined from a requirement of 180 dwellings per annum (900) plus the shortfall from 2018/19 of 107 dwellings (1007) and the addition of a 10% buffer as the Framework requires (1095).

a) Outstanding Planning Permissions	-	359 Dwellings
b) Allocated Sites from PLP1	-	248 Dwellings
c) Council-owned Land in PLP1	-	0 Dwellings
d) Total Supply (a+b+c)	-	607 Dwellings
e) 5-year Housing Need	-	1108 dwellings
f) Available Supply	-	2.8 years

3(c) and (d)

During the course of the preparation of the Purbeck Local Plan the Council has taken several different positions in respect of its ability to meet housing need and what the relevant 'need' figure actually is.

Pre-submission May 2018 – Document SD38

At the time of the submission of the Local Plan, the Council was reliant upon its Five-Year Housing Land Supply update 1st April 2018 to 31st March 2023; which was prepared in May 2018 (document ref. SD38). At that time the Council considered it was able to demonstrate 5.7 years supply.

The housing supply position was assessed against the NPPF (2012), which was in force at the time. This assessment marginally pre-dated the NPPF (2018) which came in to force in June 2018.

The Council attested that its supply would arise from the following sources:

Housing need 2018-2023 at 107.2 dwellings per annum based on the adopted 120dpa rate and delivery up to 2018. Including a 5% buffer for market choice.

a) Outstanding Planning Permissions	-	359 Dwellings
b) Settlement Extensions	-	248 Dwellings
c) Council-owned Land in PLP1	-	0 Dwellings
d) Total Supply (a+b+c)	-	607 Dwellings
e) 5-year Housing Need	-	536
f) Available Supply	-	5.7 years

The Council's projected available supply was based on its determined need at 107.3 dwellings per annum. The Council considered that it has oversupplied during the course of the Local Plan Part 1 (2012) (PLP1) period from 2006-2018.

With reference to our Client's earlier representations on this matter, we note that; at the time that PLP1 was examined by the EiP Inspector, it was considered that an immediate review would need to be undertaken to increase the Council's housing delivery position to more accurately meet its need. It was suggested at this time that the figure should be increased to 170. It was the case that at the time the plan was examined, 6 years of the plan period had already elapsed and the evidence base informing the plan was significantly aged at the time it was adopted; hence the need for immediate review and an increase in the housing need position. The Council did not undertake the review by 2017 as the Inspector has required of it in allowing the plan to be made sound and the Council made no attempt to review its housing need position during the course of the plan period. The Strategic Housing Market Assessment (SHMA) 2015 indicated a housing need of 238 dwellings per annum, but again this was ignored.

The suppressed position of housing need advocated by the Council within its 5-Year Housing Land Supply position statement of May 2018 was thus not considered to reasonably represent the actual needs of the District. The Council's housing delivery policies were aged and out of date and continuing to follow the position of the housing need being the 120 dwellings per annum advocated by the adopted plan was neither reasonable nor tenable.

We considered therefore that, at the time the plan was submitted for examination, the Council could not demonstrate a 5-year housing land supply its housing need position was actually as follows:

Housing need 2018-2023 at 170 dwellings per annum (minimum – best case position); based on therefore, including the relevant buffer at 5%, takes the need per annum to 178.5 dwellings.

a) Outstanding Planning Permissions	-	359 Dwellings
b) Settlement Extensions	-	248 Dwellings
c) Council-owned Land in PLP1	-	0 Dwellings
d) Total Supply (a+b+c)	-	607 Dwellings
e) 5-year Housing Need	-	893
f) Available Supply	-	3.4 years

It was considered therefore that, in a best-case scenario of accepting the increased figure of 170 dwellings per annum advocated for by the Inspector from 2017 onwards, the Council could only demonstrate a 3.4 year supply. If one allowed for the figure of 238 dwellings per annum as was advocated within the SHMA 2015 would put the supply at 2.43 years. This is before the application of any 20% buffer for under-delivery, which, if taking an increase housing need position, would have occurred, or indeed allowing for the shortfall in delivery which would have occurred.

It is acknowledged that the Standard methodology came in to force as the means of calculating housing need following this and thus a revision to the housing need position in this regard was necessary. For the purposes of the progressive position of the Council in respect of 5-year housing land supply it is relevant to understand the timelines here.

Pre-Hearing Sessions - May 2019 – Document SD38a

The Council's updated position was prepared in May 2019; within its 5-Year Housing Land Supply Report (document ref. SD38a), to sit alongside the examination and with the intention of the Council to utilise this as a means of securing its 5-Year Housing Land Supply position in the form of an 'Annual Position Statement' as advocated by Paragraph 73 of the Framework.

The Council considers that its housing land supply position for the 5-year period from 2019-2024 is as follows:

Housing need for 2019-2024

a) 168 dwellings per annum (x5)	-	840 dwellings
b) Shortfall in completions 2018-2019	-	95 dwellings
c) Need plus shortfall and buffer (10%)	-	1029 dwellings
d) Annual need (c/5)	-	206 dwellings

Against this, the Council considers it can demonstrate a supply of 1403 dwelling, anticipated to be deliverable between 1st April 2019 and 31st March 2024. Providing a figure of 6.8 years supply. This supply is comprised of the following sources:

a) Outstanding Planning Permissions	-	502 dwellings
b) Bere Regis Neighbourhood Plan Allocations	-	42 dwellings
c) Swanage Local Plan Allocations	-	39 dwellings
d) Local Plan Allocations in Wool	-	215 dwellings
e) Local Plan Allocations in Moreton	-	50 dwellings
f) LPA in Lytchett Matravers and Upton	-	240 dwellings
g) Windfall and Small Sites	-	315 dwellings
h) Total	-	1403 dwellings

The following paragraphs deal with the sources of supply in turn to form the context of this assessment and thereafter that drawn in to SD87.

Outstanding planning permissions (A)

At Appendix A of the 5-Year Housing Land Supply Report, the Council has provided a list of those sites which it considered comprise the outstanding planning permissions. It is noted as a first point that these outstanding planning permissions, with the exception of the Huntick Farm site at Lytchett Matravers and the allocated Swanage Local Plan sites of The Old Grammar School (Northbrook Road West), Northbrook Road East and Prospect Farm, comprise windfall development. That is to say they are planning permissions on sites which have not formally been allocated within the development plan and thus comply with the Framework's definition of windfall.

Within its projected supply therefore the Council has made two allowances for windfall; one comprising existing windfall consented; which are by definition windfall, and a second additional allowance for all further windfall consents. This is neither reasonable nor appropriate and gives rise to (excluding the allocated sites referred to above) a windfall allowance of 610 dwellings within the first 5 years; or 122 per annum. This is significantly above any historic windfall rates and trends and there is no evidence to demonstrate this level of delivery. In allowing for two individual windfall allowances the Council has double counted.

The Council made a specific comment in respect of Spyway Orchard within the 5-Year Housing Land supply report to explain why this had been included despite being an outline planning consent. The Council considered, at the time of the preparation of the report, that it was reasonable to include this site within the deliverable supply for the next 5 year period on the basis that a reserved matters application had been lodged

and was due to be determined in May 2019 by the Council's Planning Committee. The application did not come before the committee in May and has not been reintroduced to the agenda since this time. It sits at present undetermined and thus there remains no implementable planning consent and no likelihood that the development will come forwards in the next 5-years as the time of writing in September 2019. Given that this development comprises 'windfall development' in any event, it would seem inappropriate to allow for its inclusion again alongside making an additional windfall allowance within the Council's supply. This, as mentioned previously, is double counting. The Council should not include the 28 dwellings proposed at Spyway Orchard within its deliverable supply where it does not meet the tests of deliverable for the purposes of the Framework,

Digging deeper in to the 'Outstanding Planning Permissions', it is noted that there are a number of sites with planning permissions which the Council considered have 'not started' (n/s) and where, this being the case, their relevant planning permission will have lapsed. In such circumstances therefore these are sites which do not benefit from planning permission and thus should not be included within the deliverable supply. Those sites which amount to the delivery of 27 dwellings in total, are identified below:

- Land adj. 4 East Chaldon, Chaldon Herring – 1 dwelling
- Kemps Country House Hotel, East Stoke – 6 dwellings
- Charity Farm, Dorchester Road, Lytchett Minster – 1 dwelling
- Redbridge Farm, Dolmans Hill, Lytchett Matravers – 1 dwelling
- Land adj. Olive Cottage, Swanage – 1 dwelling
- 68 Queens Road, Swanage – 1 dwelling
- Seabank Lodge, Ulwell Road, Swanage – 2 dwellings
- 10 Durberville Drive, Swanage – 1 dwelling
- 37 Commercial Road, Swanage – 1 dwelling
- 15 Sydenham Road, Swanage – 1 dwelling
- 3 St Michaels Road, Wareham – 2 dwellings
- 2 Meadow View Close – 1 dwelling
- 18 and 20 South Street, Wareham – 1 dwelling
- The Ammonite Barn, Dorchester Road, Winfrith Newburgh – 1 dwelling
- West Burton Farmhouse, Winfrith Newburgh – 1 dwelling
- Land to East, Burton Cross Roundabout, Wool – 2 dwellings
- Evergreen, Bailey's Drove, Wool – 1 dwelling
- Renscombe Farm, Worth Matravers – 2 dwellings
- Seaforth, Kingston Road, Worth Matravers – 1 dwelling
- Royal Observer Corps Monitoring Post, Worth Matravers – 1 dwelling

The Council should thus have reduced the 'Outstanding Planning Permissions' to 240 dwellings from windfall, with 207 from allocations within both PLP1 and the Swanage Local Plan. The windfall allowance from existing consents should also have been factored into the windfall proposed for the first 5 years i.e. this should be reduced to a rate which the Council can reasonably demonstrate has been achieved over the last 10 years.

The Council cited at Page 8 of the 5-Year Housing Land Supply Report a graph indicating the past trend of windfall within the District. Over the past 10 years the level of windfall development has been approximately 69 dwellings (68.4). This includes the markedly increased rate from 2009/10, which has not been achieved since. Taking a 9 year tend from 2010/11 to 2018/19 provides a more consistent evidence base and provides us with 62 dwellings per annum. We consider that this is the maximum reasonable windfall allowance per annum which the Council should allow for. Thus, in total over the 5-year period this amounts to 310 dwellings; a significant reduction from the 610 the Council has allowed for.

There is simply no evidence to suggest that a greater rate of windfall delivery is likely to occur irrespective of the level of extant planning consents.

Local Plan Allocations

The Council projected that it would be possible to deliver 505 dwellings within the initial 5 years of the plan period from Local Plan Allocations. We do not consider however that this is an appropriate projection having regard for the lead in times in bringing such developments forwards.

We do not take issue with the projected delivery of the sites in Upton or Lytchett Matravers, having regard for their more modest scale and the level of infrastructure to be delivered; indeed in respect of the allocation at Upton the developer is ready to roll on to the site having recently completed the earlier phase.

We do however raise concerns with the proposed delivery of the strategic sites at Moreton Station and Wool.

In respect of Moreton Station, it is anticipated that deliver will commence in 2023/24. The site however is in a position where there is no developer on board; it is anticipated that two developers will be required to build out at the intended rate, and there is a need for significant infrastructure works; including the provision of mains services and the remediation of the quarrying activity, to take place before any residential development can begin to be delivered. It is likely that this timescale will slip at least one year to 2024/25. It is considered that this site should not be included within the next 5-year supply period, comprising a reduction of 50 dwellings.

In respect of Wool, it is projected that delivery will commence in 2020/21; less than 18 months at the time of writing. With the Local Plan yet to be formally adopted, and the expectation being that this will not occur until at least early 2020, it is considered unrealistic to expect that an Outline Planning Permission then an initial reserved matters phase, discharge of condition and all of the necessary initial infrastructure works to support the development and delivery of the SANG, will occur in sufficient a timescale to make this a reasonable proposition. It is expected therefore that the delivery period for the Wool allocation will also slide backwards at least one year within the plan period to an initial delivery date of 2021/22. This reasonable will represent a reduction of 65 dwellings within the initial 5-year period.

In total therefore it is anticipated that there has been an over estimation on the Council's part to the tune of at least 115 dwellings. It is more appropriate to take a precautionary approach here than to set the Council up for failure with under-delivery in the initial years of the plan period; as has been the case with the period 2018-2019.

Total Delivery

Having regard for the matters discussed above, it is considered that the following schedule is more representative of the housing completions which are likely to occur within the immediate 5-year period:

a) Outstanding Consented Allocations	-	207 dwellings
b) Bere Regis Neighbourhood Plan Allocations	-	42 dwellings
c) Swanage Local Plan Allocations	-	39 dwellings
d) Local Plan Allocations in Wool	-	150 dwellings
e) Local Plan Allocations in Moreton	-	0 dwellings
f) LPA in Lytchett Matravers and Upton	-	240 dwellings
g) Outstanding Windfall Planning Permissions and Windfall allowance	-	310 dwellings
h) Total	-	988 dwellings

The current housing need position, based on 180 dwellings per annum, and inclusive of both the shortfall of 107 dwellings which occurred in the initial year of the plan period and a 10% buffer is **1108 dwellings**.

Based on the available delivery, from the Council's figures, and the assessed housing need above, it is considered that the Council could demonstrate **4.46 years supply**.

As detailed below however, the Council's position was changed again during the August Hearing Sessions.

During Hearing Sessions – August 2019 - Document SD87 and Housing Trajectory Worksheet

The housing needs of the District have been discussed in detail during the course of the Examination Hearing Sessions. It has been suggested that the Council's need in accordance with the Standard Methodology should increase to 180 dwellings per annum as a starting point; this is necessary to comply with the PPG and the Framework in respect of the methodology for calculating said need. We completely concur with this position.

It is still to be determined whether or not there is appropriate justification for the housing need to increase above this figure of 180 dwellings per annum, having regard for historic patterns of delivery, supporting economic growth and the need to address a shortfall in affordable housing delivery. For the purposes of this response however we assume the starting point of 180 dwellings per annum. Evidently should this rise the Council's position will be worsened.

During the course of the August hearing sessions on Matter E – Housing, the Council produced a new detailed 5-Year Housing Land Supply Report August 2019 and a separate Housing Trajectory Worksheet which it intended to then append to document SD87. The trajectory worksheet proposes a very different housing delivery position to that which the Council had previously advocated within its 5-Year Housing Land Supply Report May 2019 and indeed different from that set out within its hearing statement for Matter E.

The Council has therefore considered that the position set out within its assessment of May 2019 overestimated what can reasonably be described to make up its supply. There has been a reduction in the forecast from 1403 dwellings to 1285 dwellings now proposed. We consider that, even with the reduced figure now advocated for, the Council has overestimated what can reasonably be relied upon as deliverable within the initial years of the plan period.

The Council now advocates that the following makes up its 5-year supply:

a) Permissions Major	- 304 dwellings
b) Permissions Minor	- 208 dwellings
c) Local Plan Allocations in Wool	- 215 dwellings
d) Local Plan Allocations in Moreton	- 50 dwellings
e) LPA in Lytchett Matravers and Upton	- 240 dwellings
f) Unconsented Swanage LP Allocations	- 40 dwellings
g) Neighbourhood Plan Allocations	- 42 dwellings
h) Windfall Development	- 186 dwellings
i) Total	- 1285 dwellings

The 'Permissions Major' comprises some of the allocations from PLP1 and the Swanage Local Plan; 207 dwellings of which are consented (the Council has cited consent ref. 6/2016/0769 as 52 dwellings rather than the 51 actually consented), but also some major windfall consents. The other major consents included within this figure are windfall. They are not from allocations, and thus double counting occurs in the way the figures have been construed.

The 'Permissions Minor' all comprises windfall development thus, alongside the major windfall and a separate windfall allowance in the early years, the Council has double counted. The Windfall allowance as a whole should be based on a justified rate of delivery of 62dpa, as has been previously discussed. This provides for 310 dwellings across the 5 year period. It is noted that the list of expired permissions identified above, remain included within the Council's deliverable supply, again as these have not been commenced and have expired, they should be removed. This does not however change the figure we propose as reasonable for the windfall allowance.

The same concerns remain in respect of the Allocated sites, as identified above, in terms of their delivery timeline. We maintain that this should be pushed back a year. It is also the case that an application has been made in Swanage for 39 dwellings on the remaining allocation; we have thus adopted this figure within the supply as proposed.

Based on the updated position of the Council in SD87 and the related housing trajectory worksheet, Westcoast (Purbeck) Ltd's position is set out below:

a) Outstanding Consented Allocations	-	207 dwellings
b) Bere Regis Neighbourhood Plan Allocations	-	42 dwellings
c) Swanage Local Plan Allocations	-	39 dwellings
d) Local Plan Allocations in Wool	-	150 dwellings
e) Local Plan Allocations in Moreton	-	0 dwellings
f) LPA in Lytchett Matravers and Upton	-	240 dwellings
g) Outstanding Windfall Planning Permissions and Windfall allowance	-	310 dwellings
h) Total	-	988 dwellings

Based on a housing need position therefore of 1108 dwellings; as calculated above, we maintain that, even following adoption of the Local Plan the Council will not be able to demonstrate a deliverable 5-year housing land supply. It is considered that the Council could reasonably demonstrate **4.46 years supply**.

Conclusion

It is worth noting that this position has not changed, in respect of the Council's earlier update. We still maintain that the Council will not be able to demonstrate a 5-year housing land supply and has significantly overestimated windfall delivery and the timescale for delivery of its strategic allocations.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

Direct email: adam@kppcltd.co.uk

Website: www.kenparkeplanning.com

For information:

The Inspector will only take into consideration the comments relating to the discussions from the first week of hearing sessions in July 2019

Post Green,
Lytchett Minster,
Poole.

4th September, 2019.

South Lytchett Estate comment to Matter I, issue 2: Monitoring.

I would like to challenge the Council's assertion that adequate monitoring is in place in relation to Wessex Water and the provision of adequate sewerage in Lytchett Matravers.

I attach to this email the Wessex Water record of storm discharges from the Bulbury Lane Pumping Station at Lytchett Matravers from 2015 until the present day. Wessex Water have a storm discharge license to be used in exceptional weather events, however as you will see from the charts, the discharges take place regularly and sometimes for days on end.

The discharge license is to discharge sewage overflow into a ditch on our farm, from there to the Sherford River and then to Poole Harbour. This is not only unpleasant; it is a health hazard and an avoidable environmental hazard to Poole Harbour.

In the Supplementary Planning Document, Nitrogen Reduction in Poole Harbour, the council state: *To conform to the requirements of the Habitats Regulations and the Water Framework Directive, the Council's planning for a growth in population have to be certain that development has either avoided harm to European protected sites or mitigated the impact to ensure that there is no adverse effect.*

I suggest the council are failing to achieve their legal requirements under the Habitats Regulations in relation to existing development and this pumping station must be upgraded before any new development takes place in Lytchett Matravers. Please may I request there is a moratorium on any further development in Lytchett Matravers until adequate infrastructure is in place to cope with existing development.

Yours faithfully,



Clare Lees.
South Lytchett Estate.

Bulbury Lane SPS - storm tank discharges (1 January 2015 - 2 January 2018)

Discharge start	Discharge stop	Spill duration days:hours:minutes
29/12/17 07:53	02/01/18 06:08	03:22:15
26/12/17 17:30	28/12/17 01:55	01:08:25
25/12/17 22:32	26/12/17 03:42	00:05:09
11/12/17 13:32	11/12/17 23:26	00:09:53
11/12/17 08:29	11/12/17 13:32	00:05:03
10/12/17 07:15	11/12/17 04:56	00:21:41
04/11/17 03:13	04/11/17 20:34	00:17:21
20/10/17 03:22	20/10/17 03:38	00:00:16
20/10/17 03:11	20/10/17 03:21	00:00:09
19/10/17 20:37	20/10/17 03:11	00:06:34
01/10/17 00:16	01/10/17 05:16	00:05:00
08/09/17 21:15	09/09/17 01:00	00:03:45
03/09/17 20:51	04/09/17 03:49	00:06:57
02/08/17 13:34	03/08/17 05:13	00:15:39
21/07/17 18:47	22/07/17 01:22	00:06:34
17/05/17 11:25	17/05/17 23:51	00:12:25
22/03/17 08:00	22/03/17 14:22	00:06:22
05/03/17 06:26	06/03/17 21:29	01:15:03
03/03/17 07:41	05/03/17 03:05	01:19:23
27/02/17 20:09	27/02/17 22:12	00:02:02
27/02/17 09:01	27/02/17 14:38	00:05:37
07/02/17 08:43	08/02/17 01:16	00:16:32
06/02/17 18:45	07/02/17 06:11	00:11:25
29/01/17 09:48	06/02/17 03:17	07:17:29
13/01/17 12:43	13/01/17 13:48	00:01:04
13/01/17 07:05	13/01/17 12:41	00:05:35
12/01/17 14:22	13/01/17 06:17	00:15:55
01/01/17 19:39	02/01/17 00:46	00:05:07
21/11/16 06:50	23/11/16 01:53	01:19:02
19/11/16 22:27	20/11/16 23:46	01:01:19
03/09/16 16:44	03/09/16 19:11	00:02:26
01/08/16 21:44	02/08/16 00:32	00:02:47
20/06/16 09:31	20/06/16 21:34	00:12:02
17/06/16 16:41	18/06/16 06:48	00:14:06
17/06/16 15:53	17/06/16 16:39	00:00:45
21/05/16 18:27	21/05/16 21:43	00:03:16
10/05/16 14:26	10/05/16 19:13	00:04:46
27/04/16 20:35	27/04/16 21:10	00:00:34
15/04/16 11:51	16/04/16 01:34	00:13:43
11/04/16 12:30	11/04/16 15:33	00:03:02
10/04/16 21:47	10/04/16 23:36	00:01:49
29/03/16 16:27	30/03/16 00:55	00:08:28
27/03/16 23:23	29/03/16 01:49	01:02:26
09/03/16 01:48	10/03/16 22:57	01:21:08
17/02/16 22:03	18/02/16 00:58	00:02:55
13/02/16 09:24	14/02/16 00:52	00:15:28
07/02/16 21:15	09/02/16 02:05	01:04:50
06/02/16 21:41	07/02/16 01:27	00:03:46
26/01/16 14:29	01/02/16 09:25	05:18:55

24/01/16 10:50	24/01/16 11:46	00:00:56
23/01/16 19:29	24/01/16 00:07	00:04:38
22/01/16 07:49	22/01/16 21:21	00:13:32
18/01/16 11:42	18/01/16 16:11	00:04:29
12/01/16 07:31	12/01/16 23:58	00:16:26
08/01/16 07:52	12/01/16 06:39	03:22:46
07/01/16 03:24	08/01/16 03:43	01:00:18
30/12/15 17:45	06/01/16 01:33	06:07:48
23/12/15 02:38	23/12/15 02:42	00:00:03
22/12/15 21:03	23/12/15 02:24	00:05:21
15/12/15 23:09	15/12/15 23:17	00:00:08
15/12/15 16:00	15/12/15 22:55	00:06:54
17/11/15 07:17	18/11/15 02:54	00:19:37
16/11/15 23:16	17/11/15 06:02	00:06:46
05/11/15 14:55	09/11/15 00:15	03:09:20
05/11/15 08:08	05/11/15 11:34	00:03:25
30/10/15 03:06	31/10/15 11:14	01:08:07
29/10/15 10:44	29/10/15 14:25	00:03:41
17/09/15 09:34	17/09/15 10:19	00:00:45
16/09/15 15:40	17/09/15 05:04	00:13:23
26/08/15 10:20	26/08/15 22:03	00:11:42
25/08/15 13:12	25/08/15 20:45	00:07:33
24/08/15 11:57	24/08/15 20:41	00:08:43
23/08/15 10:31	23/08/15 12:58	00:02:27
26/07/15 13:45	26/07/15 19:30	00:05:45
26/07/15 10:44	26/07/15 13:16	00:02:32
14/05/15 11:12	14/05/15 18:00	00:06:48
05/05/15 09:23	05/05/15 10:00	00:00:36
22/02/15 16:23	23/02/15 09:37	00:17:13
19/02/15 19:27	21/02/15 12:11	01:16:44
16/02/15 11:32	17/02/15 10:34	00:23:02
14/02/15 09:27	14/02/15 13:27	00:03:59
13/02/15 21:26	14/02/15 01:45	00:04:18
22/01/15 11:06	23/01/15 01:27	00:14:21
21/01/15 02:42	22/01/15 09:18	01:06:35
14/01/15 21:00	17/01/15 12:05	02:15:05
13/01/15 18:38	14/01/15 11:30	00:16:51
13/01/15 06:53	13/01/15 16:41	00:09:47
12/01/15 21:57	13/01/15 06:53	00:08:56
08/01/15 07:41	09/01/15 12:50	01:05:08
03/01/15 10:46	04/01/15 02:06	00:15:20

From: Ruth Barden <Ruth.Barden@wessexwater.co.uk>
 Subject: RE: Bulbury Lane Pumping Station.
 Date: 20 August 2019 13:23:52 BST
 To: Clare Lees <[REDACTED]>

Dear Clare,

Apologies, I thought you were just looking for the headline figures.

Please find below a table showing the spill dates, times and duration during 2018 and 2019. There is a final column where we have highlighted false alarms. The data is collated and analysed manually using telemetry alarms received from the site. A false alarm has been indicated where there is a discrepancy, for example there is an alarm but the high level alarm in the wet well has not been triggered, indicating that the levels are insufficient to cause a spill.

I hope this helps.

Thanks,
 Ruth

Alarm Start	Alarm Stop	total duration	true alarm?
01/01/2018 00:00	02/01/2018 05:52	05:52:00	
02/01/2018 11:30	03/01/2018 03:06	15:36:05	
03/01/2018 03:06	04/01/2018 00:18	21:11:44	
04/01/2018 10:10	06/01/2018 23:20	13:10:01	
21/01/2018 11:05	23/01/2018 02:04	14:58:53	
24/01/2018 15:26	26/01/2018 00:47	09:21:32	
30/01/2018 14:16	30/01/2018 14:18	00:02:16	FALSE
30/01/2018 14:27	30/01/2018 14:32	00:05:02	FALSE
30/01/2018 15:43	30/01/2018 15:44	00:00:32	FALSE
30/01/2018 15:46	30/01/2018 15:51	00:05:56	FALSE
31/01/2018 09:36	31/01/2018 14:35	04:58:15	
13/02/2018 10:52	14/02/2018 01:51	14:58:08	
14/02/2018 14:09	16/02/2018 03:47	13:38:58	
03/03/2018 12:22	06/03/2018 23:16	10:54:20	
08/03/2018 15:12	08/03/2018 15:12	00:00:21	FALSE
09/03/2018 18:07	10/03/2018 16:12	22:04:57	FALSE
10/03/2018 16:21	10/03/2018 16:37	00:15:56	
10/03/2018 16:40	11/03/2018 02:44	10:04:13	
15/03/2018 02:08	15/03/2018 11:23	09:14:50	
15/03/2018 11:28	15/03/2018 11:34	00:06:25	
15/03/2018 12:19	15/03/2018 12:26	00:06:37	
15/03/2018 13:08	15/03/2018 13:24	00:16:14	
15/03/2018 13:29	15/03/2018 14:12	00:43:00	
15/03/2018 15:03	15/03/2018 15:05	00:02:27	
15/03/2018 17:55	16/03/2018 03:19	09:23:51	
28/03/2018 08:42	28/03/2018 14:30	05:48:33	
28/03/2018 14:35	28/03/2018 16:26	01:51:07	
28/03/2018 16:33	28/03/2018 16:51	00:17:48	
28/03/2018 18:09	28/03/2018 18:20	00:11:03	
28/03/2018 18:30	28/03/2018 18:44	00:13:28	
28/03/2018 19:03	29/03/2018 01:45	06:41:57	
29/03/2018 08:30	01/04/2018 09:27	00:57:02	
01/04/2018 11:19	01/04/2018 12:17	00:58:02	
01/04/2018 12:26	01/04/2018 12:32	00:06:01	
01/04/2018 19:50	05/04/2018 03:36	07:46:08	

10/04/2018 06:50	10/04/2018 23:27	16:37:12	
11/04/2018 07:06	11/04/2018 11:56	04:50:20	
29/07/2018 10:50	29/07/2018 11:38	00:47:28	
29/07/2018 12:59	29/07/2018 14:57	01:57:25	
29/07/2018 14:58	29/07/2018 15:23	00:25:10	
26/08/2018 15:18	26/08/2018 16:52	01:34:31	
27/08/2018 14:55	27/08/2018 14:56	00:00:35	FALSE
06/09/2018 13:41	06/09/2018 13:41	00:00:34	FALSE
12/09/2018 09:06	12/09/2018 14:30	05:24:12	FALSE
23/09/2018 09:31	23/09/2018 12:22	02:51:17	
02/10/2018 19:22	02/10/2018 19:23	00:00:35	FALSE
14/10/2018 07:17	14/10/2018 14:16	06:59:49	
09/11/2018 19:15	10/11/2018 03:50	08:35:23	
10/11/2018 15:04	10/11/2018 19:30	04:26:34	
10/11/2018 19:58	10/11/2018 21:24	01:26:32	
10/11/2018 22:17	11/11/2018 00:09	01:51:50	
11/11/2018 04:29	11/11/2018 14:23	09:53:51	
12/11/2018 21:24	12/11/2018 21:24	00:00:35	FALSE
15/11/2018 16:41	15/11/2018 16:41	00:00:31	FALSE
27/11/2018 14:27	28/11/2018 01:45	11:17:27	
28/11/2018 02:38	29/11/2018 01:11	22:32:26	
29/11/2018 01:24	29/11/2018 02:52	01:28:04	
29/11/2018 04:03	29/11/2018 11:10	07:06:57	
29/11/2018 11:15	29/11/2018 11:25	00:10:07	
29/11/2018 11:34	29/11/2018 11:42	00:07:27	
01/12/2018 07:45	02/12/2018 16:04	08:18:55	
02/12/2018 16:43	02/12/2018 21:45	05:02:39	
03/12/2018 17:14	03/12/2018 17:18	00:04:09	
03/12/2018 17:23	03/12/2018 17:23	00:00:07	FALSE
03/12/2018 17:29	03/12/2018 17:29	00:00:31	FALSE
05/12/2018 15:07	06/12/2018 06:29	15:22:06	
07/12/2018 07:09	09/12/2018 02:37	19:27:43	
09/12/2018 18:51	09/12/2018 18:54	00:03:10	FALSE
15/12/2018 12:12	18/12/2018 01:58	13:45:56	
18/12/2018 15:07	22/12/2018 06:48	15:41:36	
23/12/2018 09:51	24/12/2018 23:37	13:45:40	
19/01/2019 11:33	20/01/2019 03:09	15:36:11	
04/02/2019 07:06	05/02/2019 04:04	20:57:35	
05/02/2019 22:42	08/02/2019 02:53	04:10:24	
08/02/2019 07:58	11/02/2019 05:20	21:22:06	
03/03/2019 10:43	05/03/2019 05:53	19:09:11	
05/03/2019 22:12	08/03/2019 01:19	03:06:46	
10/03/2019 10:22	11/03/2019 00:26	14:04:18	
12/03/2019 12:24	13/03/2019 22:54	10:29:29	
12/04/2019 20:16	12/04/2019 20:40	00:23:26	
08/05/2019 07:22	08/05/2019 11:55	04:32:36	

From: Clare Lees [REDACTED]
Sent: 20 August 2019 12:42
To: Ruth Barden <Ruth.Barden@wessexwater.co.uk>
Subject: Re: Bulbury Lane Pumping Station.

Post Green,
Lytchett Minster,
Poole.

4th September, 2019.

South Lytchett Estate comment to Matter I, issue 2: Monitoring.

I would like to challenge the Council's assertion that adequate monitoring is in place in relation to residential mobile home sites. Within a one mile radius of Lytchett Minster and Upton Parish I estimate there are 800 mobile homes. This demonstrates:

- * The urgent need for housing in the land close to the BCP conurbation and major services.
- * The failure of Purbeck District Council to monitor unrestricted mobile home development.

Within the one mile radius there are the following sites:

Royale Heights, Beacon Hill. Approximately 200 homes. Occupancy 12 months of the year. This site was a caravan and camping site until 2017 when it was purchased and a successful application made by the purchasers to Purbeck Council claiming the site had been occupied around the year for 10 years, PDC Ref: 6/2017/0595. This site is in the middle of internationally protected heathland.

Organford Mobile Home Park at Organford. Approximately 130 homes. This was a former caravan site which had 12 months occupancy under its planning consent. I understand following conversations with a former officer of Purbeck District Council, an administrative error led to this site being inadvertently enlarged beyond its original footprint [6/2015/0634/0365/0677/0029/0230/](#) and others.

Tanglewood Holiday Park, Sandford. 12 month occupancy and approximately 35 homes.

Sandford Holiday Park., Sandford. 350 homes, 11 month occupancy. I telephoned recently asking about purchasing a home and whether I could live there for 12 months. I was assured as long as I could provide a permanent address elsewhere, 12 month occupancy was possible.

Holton Heath Mobile Home Park, Holton Heath. Approximately 60 homes. Occupancy 12 months.

Slepe Mobile Home Park, Slepe. Approximately 30 homes. Occupancy 12 months.

Upton Cross Park, Upton. Approximately 40 homes. Occupancy 12 months.

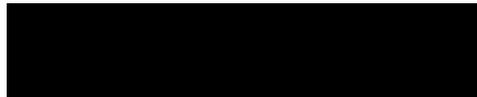
There are also several holiday sites within the 1 mile radius of the parish.

All the residential sites are in sensitive areas, some inside protected heathland (and welcoming pets) and some within 400m of heathland. All are developed without council oversight; environmental impact work, community contributions, traffic impact assessments and SANGS land where appropriate.

The first two sites on the list are as a result of a failure to monitor by Purbeck District Council.

This morning on Rightmove, there are 89 properties for sale within a 1 mile radius of Lytchett Minster and Upton Parish, of which 21 are mobile homes. This is a clear demonstration of the demand for low cost housing in this area, close to employment, decent public transport and major services available in Poole.

Yours faithfully,

A large black rectangular redaction box covering the signature of the sender.

Clare Lees, South Lytchett Estate.