

Purbeck Local Plan Review 2019

Matter H: Infrastructure Further Representations Thursday 8 August 2.00pm

	Consultee ID	Name/Organisation
1	1188328	Wareham Town Council Neighbourhood Plan Steering Group
2	1188470	Moreton Parish Council
3	1191908	Dr Andrew Langley
4	1190289	Swanage Railway Trust
5	1190180	The Charborough Estate
6	1190693	Lulworth Estate, Redwood Partnership, Mr A Jackson
7	1190993	The Moreton Estate
8	1188067	Welbeck Land
9	1186743	Natural England

Examination of the Purbeck Local Plan

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

Submitted by Wareham Neighbourhood Plan Steering Group (ID 1188328)

MATTER H: Infrastructure

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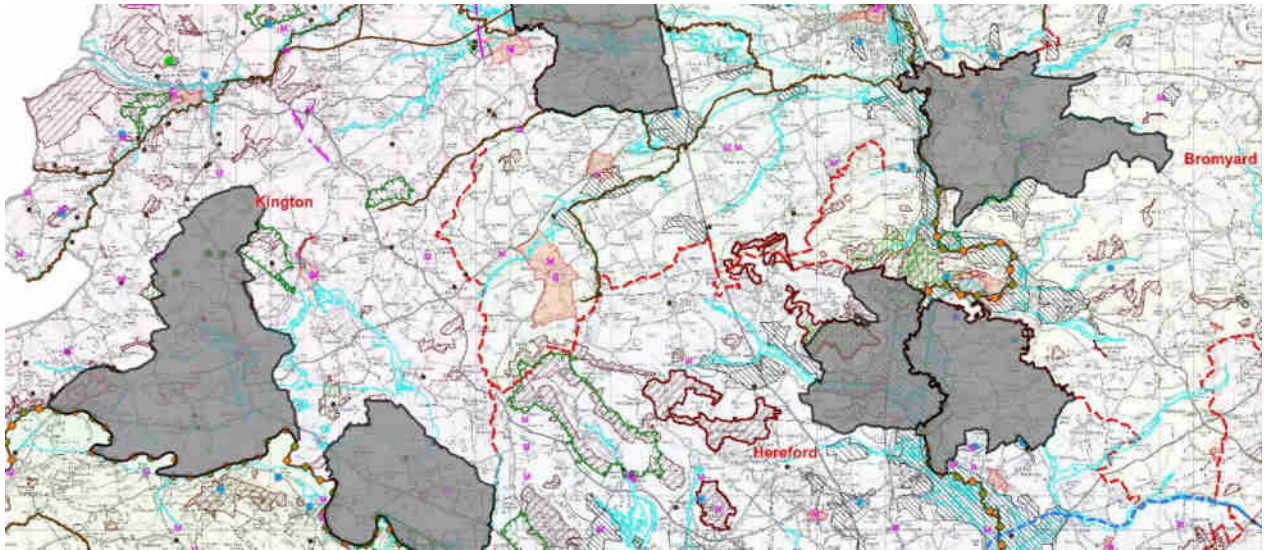
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Issue 3: Other infrastructure policies Policy I3, Policy I4, Policy I5, Policy I6 and I7)

Q2. (a) Is policy I4 (Recreation, sport and open space) justified by robust evidence, effective and consistent with national policy including paragraphs 96 and 97 of the Framework?

1. As part of the work supporting the Neighbourhood Plan, the Wareham Neighbourhood Plan Group has undertaken an assessment of the various green spaces within the plan area to established which, if any, are relevant for designation.
2. The Local Plan policy map (as proposed to be revised through the Local Plan Review) identifies those areas that it considered fall under Policy I4. Within the Wareham Neighbourhood Plan area these are limited to 4 areas within North Wareham and the Recreation Ground within Wareham Town.
3. In comparison, the Local Green Space audit (extracts included in Appendix 1) identifies many more sites that would be considered to have recreational value, including:
 - various small green amenity spaces within Northmoor Park (sites marked C)
 - allotments (sites D and L)
 - various small play areas (sites marked F)
 - the Town Walls (also a scheduled monument) (sites marked H)
 - the former Middle School Playing Fields – now a major community sports resource (site I)
 - school playing fields that are shared with the local community (sites marked J)
 - the warm memorial and area adjacent to St Martins Church – a quiet amenity space for reflection (site M)
4. It would seem that although the site identified may be justified and the policy wording may be consistent with national policy including paragraphs 96 and 97 of the Framework, the underlying evidence base could be usefully updated to include the type of sites identified through the Neighbourhood Plan audit.

5. As submitted in the further response to Matter A which deals with conflicts between the strategic policies in the Local Plan and Neighbourhood Plans, the Local Plan needs to allow flexibility for detailed matters such as the definition of important open spaces to be made through the Neighbourhood Plan process and not unnecessarily superseded when the Local Plan is updated. An approach such as taken by Herefordshire County Council, where they have blanked out areas in their core strategy referring to where neighbourhood plan policies apply, would be welcomed. A copy of their map¹ is reproduced below – the greyed areas are those covered by Neighbourhood Plans.



6. Alternatively the Policies Map should be amended to reflect that proposed in the submission draft of the Neighbourhood Plan (if the Examiner’s report concludes that this revision meets the basic conditions) and Policy I4 should also be revised to allow future changes that can be informed by the latest available evidence and considered through an appropriate level of independent examination. A possible form of wording might be:

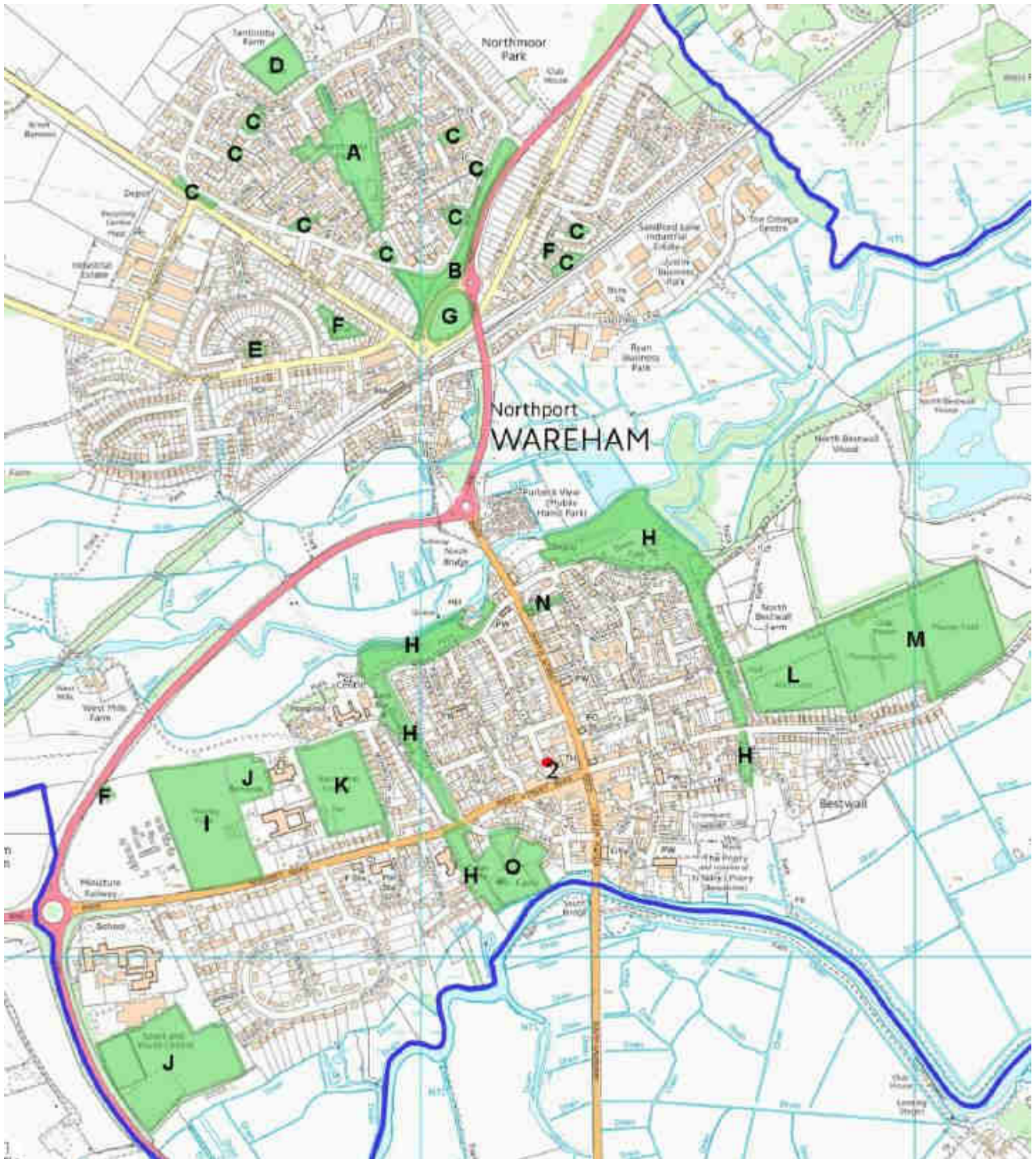
Policy I4: Recreation, sport and open space

...Safeguarding existing facilities

All open space, sport and recreation areas, as identified on the Policies Map and as may be updated or added to through Neighbourhood Plans, will be protected in accordance with national policy....

¹ https://www.herefordshire.gov.uk/download/downloads/id/1799/core_strategy_policies_map.pdf

Appendix 1 – extracts from the Local Green Space audit for Wareham (2018)



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Local Green Space	Local Significance				Ownership	Overview
	Landscape Value	Historic Significance	Recreation Value	Wildlife Value		
A. Hauses Field	Medium	Low	High	Low	Wareham Town Council	A very well used and valued play area (including skate park) and informal recreation space. The area has been recently redeveloped and improved thanks to Wareham & District Development Trust.
B. Land in Northmoor Park between A352 and Northmoor Way	High	Low	High	Medium	Dorset County Council	This area provides a green space between the existing housing estate and the busy main A351 road.
C. Various small green spaces in Northmoor Park	Medium	Low	High	Medium	Purbeck District Council	Valued green amenity spaces within housing estate generally used for informal sitting / play.
D. Northmoor Park Allotments	High	Low	High	High	Morden Estates leased to Wareham Town Council	Highly valued, well used, secure community allotments.
E. Green space opposite Carey shops	Medium	Low	High	Medium	Astor Housing Association	A peaceful space in the housing estate adjoining the local centre.
F. Play Areas at Drax Avenue, Mistover Road & Westgate	Medium	Low	High	Low	Wareham Town Council (Westgate currently Bloor Homes)	Children's play areas.
G. The Sward	Medium	Low	Medium	Medium	Dorset County Council	Landscaped green site at the Bere Road entrance to the town.

Local Green Space	Local Significance				Ownership	Overview
	Landscape Value	Historic Significance	Recreation Value	Wildlife Value		
H. Wareham Town Walls	High	High	High	High	Rempstone Estate leased to Purbeck District Council	The ancient walls are a most significant feature of the town attracting visitors and locals to which the public have right of access. There is a marked interpretive historic walk leads around the walls. Although altogether these amount to approximately 7.0ha, their sinuous configuration does not make the space feel like an extensive tract of land.
I. Former Middle School Playing Fields	High	Low	High	Medium	Dorset County Council	Major community sports resource. Regularly used for training by local youth sports teams, and a prominent green space on high ground on the western edge of the town.
J. Purbeck School & St Mary's Primary School Playing Fields	Medium / High	Low	High	Medium	Dorset County Council	The playing fields are intensively used by The Purbeck School with some areas shared with the local community through agreements with Purbeck District Council. Landscape value of St Mary's Primary School Playing Fields is high due to being on high ground on the western edge of the town
K. Recreation Ground	High	Low	High	Low	Wareham Town Council	Used as a children's play area and site of Sports Pavilion and Cricket pitch.
L. Bestwall Allotments	Medium	Low	High	Medium	Wareham Town Council	Highly valued community allotments protected under the Smallholding & Allotments Act 1908. Registered as a Community Asset.
M. Wareham Rugby Club Playing Fields	High	Low	High	Low	Wareham Town Council & Rugby Club	This is a significant community asset providing sporting and other community facilities.

Local Green Space	Local Significance				Ownership	Overview
	Landscape Value	Historic Significance	Recreation Value	Wildlife Value		
N. War Memorial and land adjacent to St Martins Church	High	High	High	Medium	Wareham PCC	St Martins Church is the most complete example of an Anglo-Saxon Church in Dorset. It dates from 1030. The grounds form part of historic Walls Walk with peaceful space to the rear.
O. Castle Close Garden	High	High	Low	Low	Private	Former site of a 12th Century motte and bailey castle, very visible in views from the south.

Inspector's Matters, Issues and Questions (MIQs)

Matter H: Infrastructure

Issue 2: Accessibility and transport (Policy I2)

Library documents:

[SD01a-Purbeck Local Plan](#)[SD25-Economy background paper](#)[SD26-Bournemouth, Dorset and Poole workspace strategy](#)**Responses to Pre-Submission Consultation**

1. Four responses relevant: Employment , Automation, Rural Functionality Study. SHLAA

Q1

1. Are the provisions for improving accessibility and transport set out in policy I2 (Improving accessibility and transport) justified, effective and consistent with national policy?

Answer to question 1

2. This Policy is very rooted in the past.
3. It does recognise the profound changes that are taking place and will take place over the period of the Plan.
4. For example with the increasing adoption of electric cars it could well be that they provide a more sustainable form of transport than electric trains which for most of the day have few passengers but use up a lot of electricity.
5. Self-generation of electricity predominantly through solar panels will further enhance the sustainability of private electric motor cars over electric trains
6. The advent of Uber and Lyft could introduce the concept of transport as a service. This is already in place in large cities such as Vienna and Helsinki and the software and availability of ride hailing organisations could spread its introduction into Purbeck and Dorset.
7. This could further enhance the sustainable advantage of cars over trains.
8. The emphasis on using public transport in Policy I2 could well be over taken by increasing adoption of the concept of transport as a service.
9. Use of transport as a service will obviate the need for public transport in almost all parts of Purbeck and Dorset and mean that development does not have to be focussed on locations where less than 2% of the population use the train or bus (Crossways-Redbridge Pit).
10. These developments will aid the spread of self-employment in technology and other sectors, and the adoption of artisanal occupations, all using small units within which to base employment.

11. Such a development would be unconstrained by the AONB and Green Belt because the self-employment units would not require the large premises historically associated with employment and the AONB and Green Belt would be well served by transport as a service.
12. These developments would utilise broadband and obviously be enhanced by access to fast broadband but will still be feasible with the current moderate speed broadband available in many rural areas of Purbeck and Dorset
13. Policy I2 does not acknowledge any of the above developments and hence is very much stuck in the past.

Inspector's Matters, Issues and Questions (MIQs)

Matter H: Infrastructure

Issue 3: Other infrastructure policies (Policy I6)

Library documents:

[SD01a-Purbeck Local Plan](#)

[SD25-Economy background paper](#)

[SD26-Bournemouth, Dorset and Poole workspace strategy](#)

Responses to Pre-Submission Consultation

1. Four responses relevant: Employment , Automation, Rural Functionality Study. SHLAA

Q4

Q4. Is policy I6 (Wareham Integrated health and social care) justified and effective?

Answer to question 4

2. No.

3. *Health and social care* is covered in the Local Plan on pages 108 to 110.

4. On page 109 in paragraph 261 the Local Plan states that:

.....Upton and Lytchett Matravers are serviced by the Adams Practice which is based outside the Purbeck locality in Poole.

5. The Local Plan states in paragraph 262 that:

..that surgeries at Bere Regis and Lytchett Matravers are already at capacity. In both cases there is sufficient space for expansion of the surgery on site.

6. On page 109 in paragraph 263 the Local Plan state that:

...the NHS should retain the Swanage community hospital, close the beds in Wareham community hospital, and develop a Wareham health hub providing integrated social care and health services, including GP surgery and ambulance station.

7. Paragraphs 263 and 264 on page 109 discuss how the health and social care will be achieved in Wareham and this is summarised in Policy I6.

8. No houses have been allocated to Swanage in the Local Plan, 90 houses to Upton, 105 houses to Bere Regis, 170 houses to Lytchett Matravers, and 300 to Wareham.

9. By contrast Moreton Station (83 existing houses) has 125 more houses and a 65 bed care home allocated to it than the Local Plan makes to Swanage, Upton, Bere Regis and Lychett Matravers combined (total houses 11, 523 houses).

10. Moreton Station/Redbridge Pit has 190 more houses and a 65 bed care home allocated to it than have been allocated to Wareham which has approximately 2728 houses.

11. On page 132 in the section Settlement hierarchy the Local Plan states that:

The only change in the settlement hierarchy given below from that outlined in the Purbeck Local Plan Part 1 (2012) is the elevation of Moreton Station to a key service village in recognition of the quantum of residential development and supporting infrastructure.

12. In physics quantum is the minimum amount of any physical entity involved in an interaction.

13. The description above refers to *the quantum ofsupporting infrastructure.*

14. Quantum is a good description because there is extremely little supporting infrastructure in Policy H4 : Moreton Station/Redbridge Pit on page 56.

15. In Policy H4 infrastructure is mentioned twice: in the opening paragraph - *supporting infrastructure* and in sub-paragraph e) - *provide financial contributions for local health infrastructure and education.* These are both legal requirements.

16. And these quantum of very little apparently are enough to raise Moreton Station to the status of being a Key Service Village.

17. The combined total of existing houses in Moreton Station and Crossways combined with the approved and planned housing will be 2787 houses (83+1100+1604).

18. Wareham has approximately 2728 houses and hence Moreton Station/Crossways will be larger than Wareham is today and only 176 houses (including the 65 bed care home) after Wareham's Neighbourhood Plan 300 houses have been built. Wareham's Neighbourhood Plan does not include a 65 bed care home.

19. But Moreton Station/Redbridge Pit is not mentioned in the section on Health and Social Care in the Purbeck Local Plan even though the GP surgery is overburdened after a GP surgery in Broadmayne was shut down.

20. Unlike Lytchett Matravers and Upton the Moreton Station/Redbridge Pit's GP surgery is only a short way away in Crossways.

21. Unlike Wareham or the other settlements mentioned on page 109, a 65 bed care home has also been allocated to Moreton Station/Redbridge Pit and this will be a major user of the local GP surgery.

22. Although the description of services to be provided in Wareham in the Local Plan is extensive and comprehensive and Wareham even has its own policy: Policy I6: *Wareham integrated health and social care*, Moreton Station/Redbridge Pit with 490 houses and a 65 bed care home does not even warrant a mention, and merely a *quantum* or *minimum amount* of infrastructure.

Summary

23. In answer to question Q4, Wareham's Policy I6 is not justified whilst Moreton Station/Redbridge Pit is totally ignored and has to make do with a *quantum* or *minimum amount* of infrastructure even though Moreton Station/Redbridge Pit-Crossways will only be 176 houses smaller than Wareham and will have a 65 bed care home.

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Part I Matter H. Infrastructure

1 Issue 3. Other Infrastructure Policies

1.1 Q. 3

1.1.0.1 For reasons in my pre-submission representation, I believe policy **I5** is unsound as drafted. It would appear to be incompatible with policy **EE4** with respect to impacts on protected sites and the “exceptional circumstances” for changing the green belt boundary have not been demonstrated; there is no identified need for a holiday park and no strategic policy for such a change. A holiday park in green belt with a “mix of [70 or 80] single storey and two storey wooden buildings with pitched roofs” and “a central administrative building and car parking area”¹ would have some similar impacts to a housing development (without delivering the identified need for housing) and it is very close to the Morden Bog area of the Dorset Heaths.

1.1.0.2 The proposed modification **MM18** is a confusing mixture of issues and singles out one potential proposal for a holiday park which seems out of place in a policy document. The “very special circumstances” for an inappropriate development in the green belt can be judged only on the balance of harm and other considerations (Framework para. 144) for that specific development. The existence of a SANG (inside or outside the green belt) does not change the harm that an additional inappropriate development in green belt might cause. All **MM18** really establishes is that a strategic SANG of sufficient size in the north of the district would be helpful for complying with Habitats Regulations and might be delivered by an enabling project that must comply with National Policy and the Local Plan.

1.1.0.3 Paras. 255 to 257 of the Local Plan ought to cover the necessary SANG provision for all of the “small sites”, infill and windfall developments, as it is uncertain how many of the 933 houses might be proposed in the “north of the district”. Proposed modification **MM19** may become superfluous if further MMs are proposed.

1.1.0.4 The proposed modification **MM20** is related to the problem of mitigating the effects of the small sites policy **H8** but it covers only part of the district. Please refer to my comments under Matter A, Issue 5 Qs 1 to 3 which suggest an alternative approach to make this policy sound. The SD19 - Housing Background Paper did not identify a need for this SANG for the current housing need.

1.1.0.5 The outline Morden Park SANG should be removed from the SD01b - Policies Map to be consistent with **MM18-MM20**.

¹SD51 Green Belt study 2018 pre-submission paras. 148 & 151.

PURBECK LOCAL PLAN

Examination in Public

MATTER H INFRASTRUCTURE

Statement by:

SWANAGE RAILWAY

1190289

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A INTRODUCTION & SUMMARY

- S1 The Swanage Railway submitted its response and representations via a 14-page document “Swanage Railway: Response & Representations” (SR: R&R). That outlines how the Swanage Railway contributes to the environment, economy, and infrastructure aims and objectives of the Local Plan, and makes representations in response to Policies I 2, I 7, and the Proposals Map.
- S 2 This Statement focusses on the representation re Policy I 7 (SR: R&R 6.1 – 6.10) and proposed Main Modification MM 21.
- S 3 In essence, MM 21 is essential to make Policy I 7 sound, for reasons outlined below, but, having done so, would fully address the Swanage Railway’s Concern that, unless so modified, I 7 is neither justified nor effective.
- S 4 The Representations re Policy I 7 and the Proposals Map (SR: R&R 5.5 – 5.10, and 7.1 – 7.6) are hereby withdrawn.

B POLICY I 7

- S 5 The part of the Plan that is unsound is Policy I 7 Criteria a:

Proposals outside of a settlement boundary should be able to satisfy the following criteria:

- a. the use cannot reasonably be met within a settlement, and the facility:*
- i. meets an identified local need;*
 - ii. Is located close to a settlement in an accessible location; and*
 - iii its impact on landscape, environment and local character is minimised.*

- S 6 This fails the NPPF soundness tests in that it is not justified, and not effective.
- S 7 It fails because (to summarise SR: R&R 6.3 – 6.8) essential railway infrastructure at locations such as Furzebrook and Norden could not meet the requirement to be close to a settlement. That requirement is **not justified** for a location which has to be alongside an existing railway line. I 7 would thus be **not effective** in enabling railway infrastructure which is essential.

C PROPOSED MAIN MODIFICATION MM 21

- S 8 This proposes to modify criteria a of policy I 7 to read:

The use cannot reasonably be met within a settlement, and the facility:

- i meets an identified need;*
- ii is where appropriate located close to a settlement or in an accessible location; and*
- iii its impact on landscape, environment and local character is minimised.*

S 9 MM 21 is essential to make the Local Plan sound, because:

- a) MM21 is **positively prepared**, in that it would enable the Local Plan to meet the areas' objectively assessed railway infrastructure needs which, for the Swanage Railway, are outlined by SR: R&R 4.8 – 4.15;
- b) MM21 it is **justified**, in that such infrastructure must by definition be alongside an existing railway, and in most cases there is no realistic alternative location other than those which are away from a settlement;
- c) the Local Plan would then be **effective**, in that MM 21 would overcome the fundamental problem with the un-modified wording of Policy I 7 which would stop such development, and thus stop the Policy being effective;
- d) the Local Plan would then be **consistent with national policy** because MM 21 would help enable the Local Plan to deliver forms of sustainable development defined by NPPF:
NPPF 8 (a) Economic objective: SR: R&R 3.1 – 3.21;
NPPF 8 (b) Social objective: SR: R&R 3.22 – 3.23;
NPPF 8 (c) Environmental objective: SR: R&R 2.1 – 2.12.

D CONCLUSIONS

S10 MM21 is essential to make the Local Plan sound and the Inspector is therefore respectfully requested to require the adoption of the Local Plan to be conditional upon incorporating MM21.

Andrew Patrick DiplArch(Portsmouth) DipTP
For & on behalf of the Swanage Railway

PURBECK LOCAL PLAN EXAMINATION

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

Matter C : Green Belt; and

Matter H : Infrastructure

Participant No : 1190180

Prepared by Pro Vision on behalf of Charborough Estate



MORDEN PARK
PROJECT NO. 2273

PREPARED BY:
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1.0 Introduction and Relevant Background

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

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

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

2.0 The Position at Pre-Submission Draft Stage

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

3.0 Submission Stage Modifications

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

4.0 Subsequent Work and Discussions

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

5.0 The Memorandum of Understanding

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

Purbeck Local Plan
Submission Draft Plan – January 2019

Statement on Matter H: Infrastructure

By

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

Representation no. 1190693

June 2019



Matter H- Infrastructure

Issue 1: Developer contributions (*Policy I1*)

Q1. Is there robust evidence to demonstrate that the Plan's requirements, together with national standards, would not threaten the viability of development or put implementation of the Plan at risk?

Our full response on viability related to the Wool allocation is in our Statement in respect of Housing. The Viability Matters report appended to that Statement is also an appendix to this Statement here. The conclusion is as follows:

- This report concludes that the Wool site is considered viable and deliverable provided the policy requirements are appropriately balanced against the costs of bringing larger sites forward for development.
- In this regard, as indicated in our previous written representation and expanded upon in this report, we feel a number of the viability inputs used by DC in their evidence base (i.e. the reports by DC's consultants Dixon Searle Partnership (DSP)) are set at levels which combined overestimate the site's ability to provide affordable housing at 40%. We consider a level at 30% to be more reflective of the overall scheme viability for the Wool allocation.
- 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.
- Overall it is concluded that affordable housing provision for Wool should be set at 30% and that a more flexible affordable housing tenure mix should also be permitted.

Q2. Is policy I1 (*Developer contributions to deliver Purbeck's infrastructure*) justified, effective and consistent with national policy in its provisions for ensuring that the infrastructure necessary to support development will be secured?

In our response to Matter E Housing, we have requested amendments to Policy H5 which are relevant, requiring the developer contributions so that they are clearly justified and proportionate to the proposed development in accordance with guidance. The last

paragraph of the Policy is noted and the landowners have had a Viability Matters report prepared.

Our Viability Matters report also provides an update with regards to the work Savills has completed with the Council and other statutory consultees through the SOCG and pre-app. process to further define applicable S106 costs relating to the Wool allocation. This process has indicated S106 costs are likely to be higher than has been tested within the Purbeck Updated Viability Study (October 2018). This is also discussed in the landowners Viability Matters report in paras 1.4.3 and 1.4.4 and the quoted appendix.

Q3. In so far as developer contributions are intended to be sought through a mix of planning obligations secured through Section 106 agreements (S106) and the use of funds secured through the Community Infrastructure Levy (CIL), would the provisions of policy I1 ensure that there is no duplication between infrastructure or funds secured through Section 106 agreements and CIL receipts?

Wool is zero rated.

Q4. For clarity should small sites as referred to in part b of the policy be defined?

Yes as per government guidance

Issue 2: Improving accessibility and transport (*Policy I2*)

Q1. Are the provisions for improving accessibility and transport set out in policy I2 (*Improving accessibility and transport*) justified, effective and consistent with national policy?

No comment. Matters relevant to Wool are covered in the MOU.

Issue 3: Other infrastructure policies (*Policy I3, Policy I4, Policy I5, Policy I6 and I7*)

Q1. (a) Is policy I3 (*Green Infrastructure, trees and hedgerows*) robust and consistent with national policy?

(b) Is the change (MM15) to the policy indicated in the schedule of possible modifications [SD14] necessary to ensure that the Plan is sound?

No comments

Q2. (a) Is policy I4 (*Recreation, sport and open space*) justified by robust evidence, effective and consistent with national policy including paragraphs 96 and 97 of the Framework?

(b) Is the change (MM16) to the supporting text of the policy indicated in the schedule of possible modifications [SD14] necessary to ensure the Plan is sound and would the change to the policy (MM17) comply with the Regulations having regard to Question 5 under Matter A (Legal Compliance and Procedural Requirements) Issue 6?

No comment

Q3. (a) Is policy I5 (*Morden Park strategic alternative natural green space (SANG) and holiday park*) justified, effective and consistent with national policy?

(b) Are the changes (MM18, MM19, MM20) to the policy and its supporting text indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is justified, effective and consistent with national policy?

No comment

Q4. Is policy I6 (*Wareham Integrated health and social care*) justified and effective?

No comment

Q5. Is policy I7 (*Community facilities and services*) justified and effective and is the modification (MM21) to policy I7 necessary to ensure the Plan is sound?

Matters related to Social, Community and Retail are covered in the MOU with the Council.

Statement on Matter H: Infrastructure

List of appendices

Appendix 1 – Viability matters

Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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



1.1. Summary

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

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

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

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

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

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

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

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

Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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



1.2. Introduction

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

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

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

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

Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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



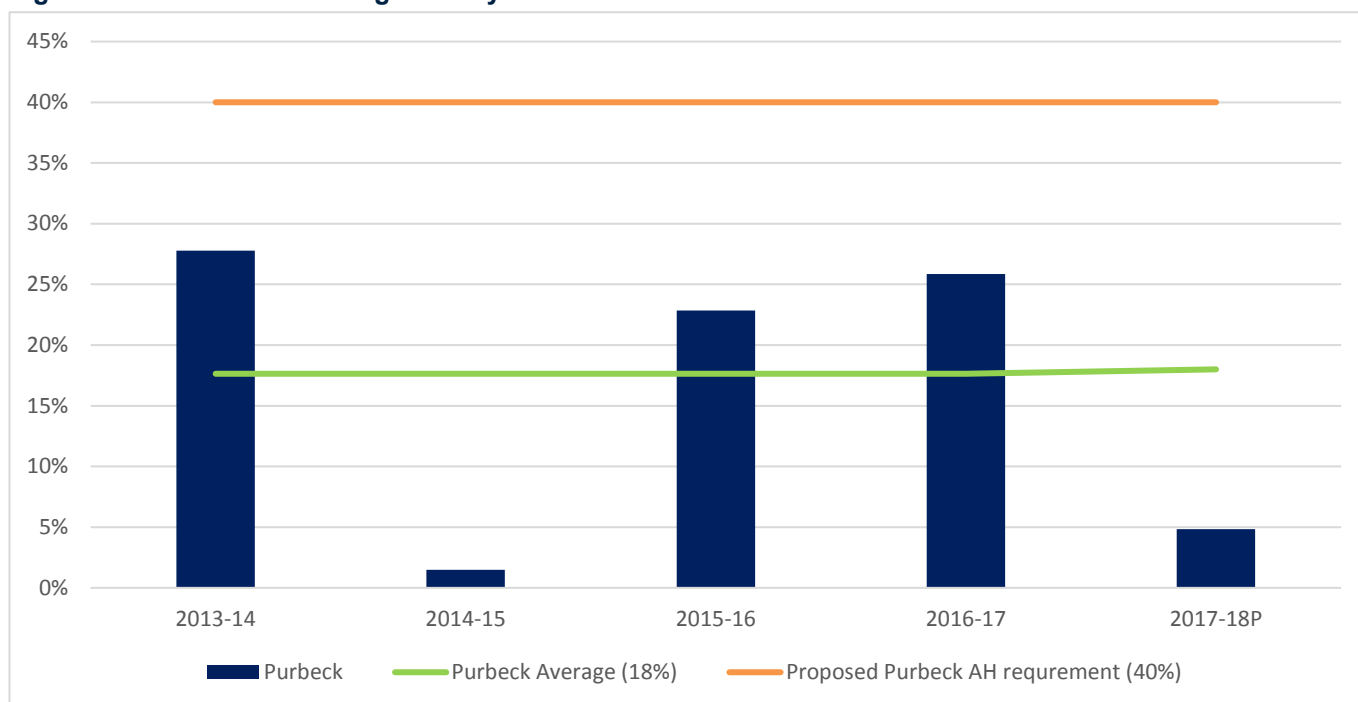
1.3. Actual Affordable Housing Delivery

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

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

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

Figure 1 – Affordable Housing Delivery



Source: MHCLG Data, Savills analysis (2019)

¹ Table LT122, MHCLG

² Table 100BC, MHCLG

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Purbeck Local Plan Submission Draft Plan – January 2019

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



1.1. Sales Values

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

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

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

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

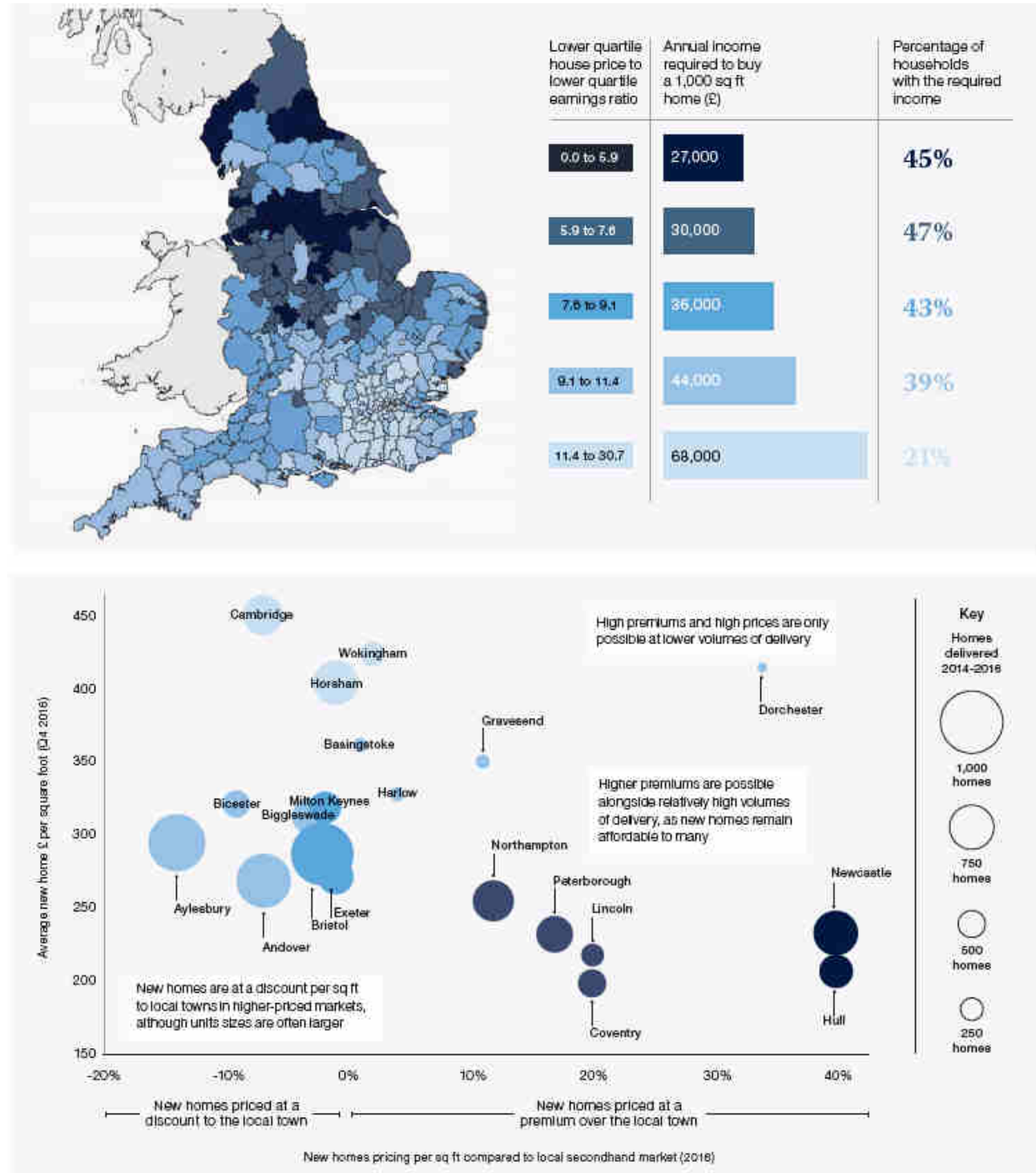
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Figure 2 – Pricing and delivery



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

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1.2. Benchmark Land Value (BLV)

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

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

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

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

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

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

Appendix 1 – Viability Matters

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Table 1 – Greenfield Land Value Comparisons

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

Source: Savills analysis (2019)

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

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

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

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

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

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

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

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

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

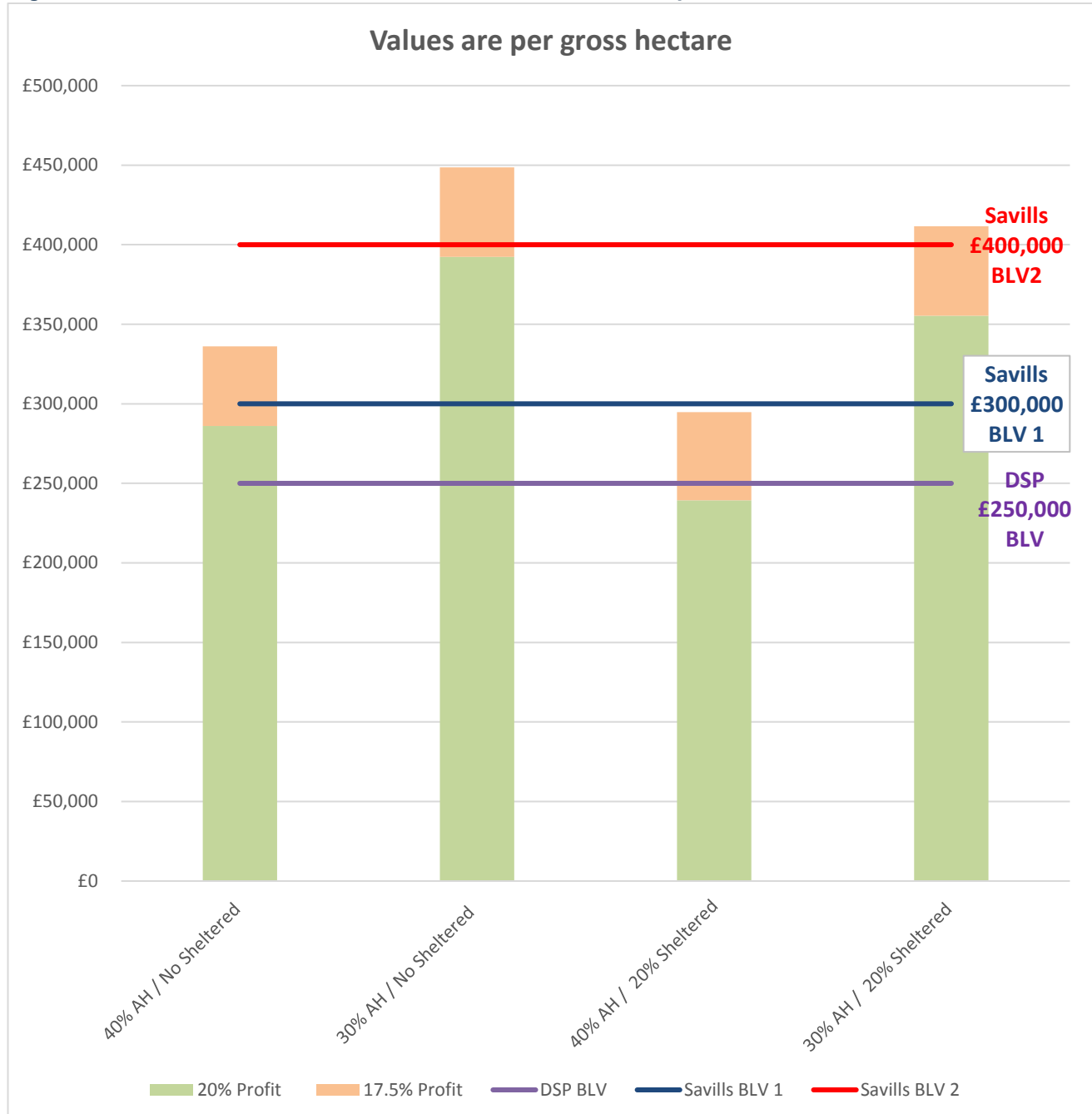
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Figure 3 – Residual Land Values at 40% and 30% Affordable compared to Greenfield Benchmark Land Values



Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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1.3. External Works

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

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

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

Table 2 – External Works Comparisons

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

Source: Savills analysis (2019)

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

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

¹¹ Community Infrastructure Levy Viability Assessment, DTZ

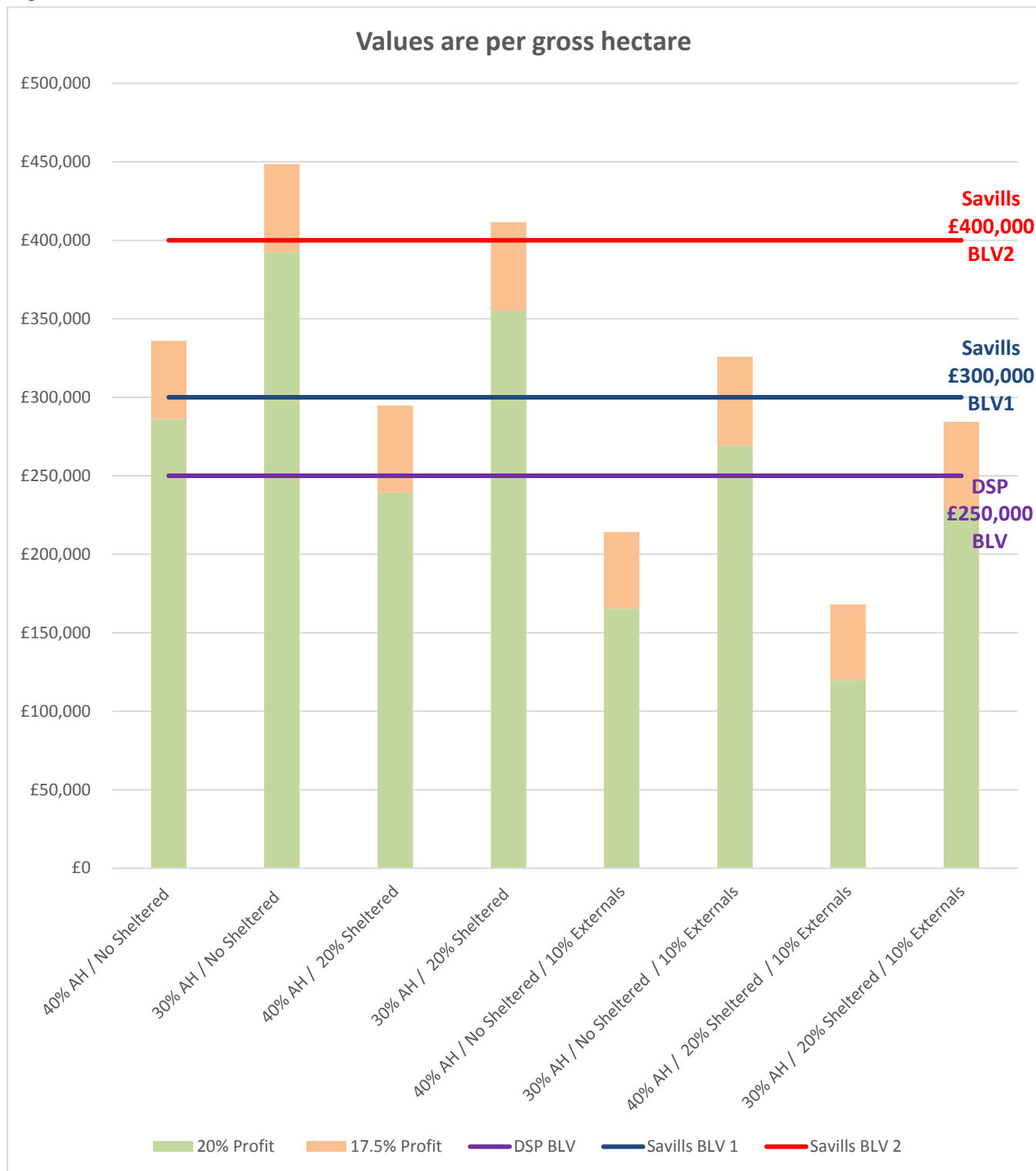
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Figure 4 - Residual Land Values with 10% externals added



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

1.4. Infrastructure & s106 costs

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

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

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

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

1.5. Construction and Sales Timescales

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

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

Appendix 1 – Viability Matters

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

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

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

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

1.6. Developer's Contingency

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

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

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

Appendix 1 – Viability Matters

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

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

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

Table 4 – Contingency Comparisons

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

Source: Savills analysis (2019)

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

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

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

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

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

Sloping topography

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

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

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

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

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

Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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



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



Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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



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

Estate Management/Public Realm Management Costs

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

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

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

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

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

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

Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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



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

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

Appendix 1: Local Sales Values

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

Appendix 1 – Viability Matters

Purbeck Local Plan Submission Draft Plan – January 2019

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



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

Headline Comparison with Purbeck IDP and Viability Report Assumptions

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

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

TOTALS

£3,618,571

£3,352,860
£4,358,860

£1,006,000

EXAMINATION OF THE PURBECK LOCAL PLAN
FURTHER STATEMENTS ON MATTER H - INFRASTRUCTURE
MORETON ESTATE
JUNE 2019



TERENCE
ROURKE

1. Issue 1: Developer Contributions

Q1. Is there robust evidence to demonstrate that the Plan's requirements, together with national standards, would not threaten the viability of development or put implementation of the Plan at risk?

1.1 Policy H4 of the plan allocates land at Moreton Station/Redbridge Pit for up to 490 new homes, a 65 bed care home, community facilities and supporting infrastructure. Read as a whole, the plan requires the site's development to directly provide and make financial contributions towards a variety of infrastructure, as well as provide 40% affordable housing.

1.2 Due to the need to fully restore the quarry before development can commence, the site is scheduled to be developed in years 6 to 10 of the plan. With regard to paragraph 67 of the NPPF (February 2019) and the definitions of 'deliverable' and 'developable' in the glossary, the Moreton Station / Redbridge Pit site is clearly a developable site, occupying a suitable location for housing development with a reasonable prospect that it will be available and could be viably developed at the point envisaged.

1.3 However, notwithstanding this, having sought independent viability advice from Tangent Surveyors, Moreton Estate has expressed a number of concerns about the high-level viability assessment of the site allocation that has been undertaken by the Dixon Searle Partnership. These concerns include the following:

- the assessment has been undertaken on the assumption that 12.3 hectares of net land is available for development (see table 3a in appendix iic), yet this is far from certain given that (a) the site has yet to be master planned and (b) the quantum and form of open space arising from the Dorset open space study that the site needs to provide, are not yet known
- the assessment assumes that the housing development would be built out in 48 months (final appendix 1, page 1) which is equivalent to 122.5 units per annum. We consider that this is totally unrealistic for this part of Dorset and consider that a build out rate of 50 dwellings per annum (assuming two developers are on site at the same time) over 10 years to be much more realistic. Clearly, a much longer build programme will increase the costs of construction
- the assessment has not allowed for any abnormal construction costs which is a significant omission given that the quarry is being restored with inert fill material and all new structures on site will need to be piled
- no allowance has been made within the assessment for costs associated with remediating contaminated land, or costs associated with site preparation, both of which could be substantial given the site's current use
- the assessment uses a low build cost of £1,200 per sqm for both the open market and affordable housing units, yet it is clear from policy E12 of the plan (and indeed will be demanded by Moreton Estate as landowner) that a high quality development is delivered – and it is simply not possible to deliver a high quality development with low build costs

- the assessment uses the same construction costs for flats and houses, yet in reality, the cost of constructing flats, terraced houses, detached houses and semi-detached houses are all different. Small differences in build costs can make a significant difference to viability across a scheme of 490 dwellings
- the assessment assumes that minimum space standards will be adhered to, which is not the case, as evidenced by paragraph 158 of the submission draft plan
- Moreton Estate considers that the costs of making the development nitrogen neutral have been underestimated, whilst the costs of SAMM contributions and the provision of a station car park appear to be missing
- the assessment does not appear to model the provision of a convenience store or a care home, and
- the assessment does not make any allowance for the costs of garage construction or circulation / communal areas within apartment blocks, of which there are likely to be a number given the requirement for single storey developments to be provided.

1.4 Under the NPPF (February 2019) and updated national planning policy guidance regarding viability published in May 2019 (paragraph:013 reference ID: 10-013-20190509), Moreton Estate – as landowner - is entitled to a premium on top of the existing use value of the land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements.

1.5 Currently, there is no robust evidence available to demonstrate that the plan's requirements, together with national standards, would threaten the viability of development or put implementation of the plan at risk. However, on the basis of preliminary viability appraisal work undertaken by Tangent Surveyors and discussed with Purbeck Council, at this moment in time, Moreton Estate considers it:

- highly likely that the residual land values at the site will be lower than reported by the Dixon Searle Partnership
- unlikely that the site's development would be able to deliver all of the infrastructure required by the plan as well as 40% housing, and still deliver an acceptable benchmarked residual land value to Moreton Estate
- likely that a future planning application for development at the site will need to be accompanied by a viability assessment (as allowed for under policies H4 and H11), once the site has been master planned and the cost of infrastructure provision and sales values in the area at that time, have been updated.

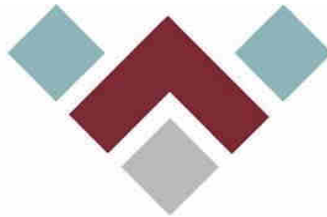
PURBECK LOCAL PLAN 2018 - 2034

EXAMINATION IN PUBLIC

RESPONSE TO MATTER H: INFRASTRUCTURE

ON BEHALF OF WELBECK LAND

JUNE 2019



WELBECK LAND

Carter Jonas

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2.0 INSPECTOR'S MATTER H: INFRASTRUCTURE.....	2
Issue 3: Other infrastructure policies	2
Q3.	2

1.0 INTRODUCTION

- 1.1 This statement is submitted by Welbeck Land (“Welbeck”) in relation to the Examination in Public of the Purbeck Local Plan 2018 - 2034 (“the plan”). Carter Jonas LLP is instructed by Welbeck.
- 1.2 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate.
- 1.3 Welbeck has been supportive of the preparation of the plan and the overall principle direction of key elements of the plan. Welbeck supports the overall strategy and the intention of providing a stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 1.4 Welbeck has specific and important concerns that the plan and its reliance on the Wareham Neighbourhood Plan will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham’s size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 1.5 Representations were made detailing the views of Welbeck through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 1188067).
- 1.6 In this submission, Welbeck sets out its responses to Matter H: Infrastructure
 - Issue 3: Other infrastructure policies. Question: 3.

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

2.0 INSPECTOR'S MATTER H: INFRASTRUCTURE

Issue 3: Other infrastructure policies (*Policy 13, Policy 14, Policy 15, Policy 16 and 17*)

Q3. (a) Is policy 15 (*Morden Park strategic alternative natural green space (SANG) and holiday park*) justified, effective and consistent with national policy?

(b) Are the changes (MM18, MM19, MM20) to the policy and its supporting text indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is justified, effective and consistent with national policy?

- 2.1 The SANG is necessary to protect the nearby European and International Nature Conservation Sites from the impact of increased recreational and urban pressures likely to result from development of sites.
- 2.2 In Welbeck's experience the provision of a SANG is a complex and expensive matter. The SANG proposed within the Local Plan at policy I5: Morden Park Corner – particularly by comparison to that in Wareham – is a relatively simple delivery task. The beneficiary of the holiday park is also the provider of the SANG, therefore the provision of the SANG is directly linked and viable.
- 2.3 Welbeck supports the suggested modifications to make the policy sound. The provision of a SANG is capable of being part of the case to demonstrate very special circumstances for development in the Green Belt, and this acceptance through policy is welcomed.
- 2.4 Welbeck suggests however, that a further consideration needs to be made about the strategic nature of SANG generally, and specifically a similar policy to I5 should be included in the plan to provide for the delivery of the Wareham SANG.
- 2.5 In Welbeck's view SANG are a strategic matter and other sites may be required to contribute to them (most likely a financial contribution). By way of example; the entirety of the Wareham Neighbourhood Plan area is located within the 5km core recreational catchment for the Dorset Heaths European sites. As such all residential development required by the Local Plan and provided by the Neighbourhood Plan has the potential to result in an adverse effect on its integrity in combination.
- 2.6 It is clear then that all sites that rely on a SANG would need to make a payment towards the SANG. In the case of the Wareham Neighbourhood Plan however, there is no further information provided. Welbeck, therefore, has concerns that other brownfield sites proposed to be allocated in the Neighbourhood Plan are not viable (or necessarily available) as matters stand and will not be able to make SANG contributions which demonstrably threatens the delivery of both housing and SANG. This risks the deliverability and effectiveness of not just the Wareham Neighbourhood Plan but also a significant part of the housing supply for the Purbeck Local Plan.

Date: 07 June 2019
Our ref: [Click here to enter text.](#)
Your ref: [Click here to enter text.](#)



BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Doward,

Purbeck Local Plan (2018 – 2034)

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

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

Matter E, Issue 4

Draft Poole Harbour Recreation SPD

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

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

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

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

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

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

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

Matter E issue 4

Policy H8 Small sites

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

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

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

Matter F, Issue 1

Policy E9 Poole Harbour

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

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

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

Policy E10 Biodiversity and geodiversity

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

Matter G

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

the Policy plan for the development area.

Matter H

Policy I1,

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

I trust this advice will be of assistance.

Yours sincerely

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