

Purbeck Local Plan Review 2019

Matter I: Implementation, delivery and monitoring

Further Representations

Friday 9 August 9.30am

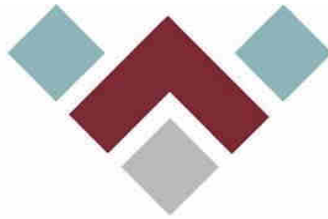
	Consultee ID	Name/Organisation
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PURBECK LOCAL PLAN 2018 - 2034

EXAMINATION IN PUBLIC

**RESPONSE TO MATTER I: IMPLEMENTATION, DELIVERY AND MONITORING
ON BEHALF OF WELBECK LAND**

JUNE 2019



WELBECK LAND

Carter Jonas

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1.0 INTRODUCTION

- 1.1 This statement is submitted by Welbeck Land (“Welbeck”) in relation to the Examination in Public of the Purbeck Local Plan 2018 - 2034 (“the plan”). Carter Jonas LLP is instructed by Welbeck.
- 1.2 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate.
- 1.3 Welbeck has been supportive of the preparation of the plan and the overall principle direction of key elements of the plan. Welbeck supports the overall strategy and the intention of providing a stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 1.4 Welbeck has specific and important concerns that the plan and its reliance on the Wareham Neighbourhood Plan will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham’s size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 1.5 Representations were made detailing the views of Welbeck through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 1188067).
- 1.6 In this submission, Welbeck sets out its responses to Matter I: Implementation, delivery and monitoring
- Issue1: Implementation and delivery. Question: 1.
 - Issue 2: Monitoring. Questions 1 and 2

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

2.0 INSPECTOR'S MATTER I: IMPLEMENTATION, DELIVERY AND MONITORING

Issue1: Implementation and delivery

Q1. Is policy IM1 (Tools for delivery – the Purbeck Local Plan implementation strategy) effective in its provisions to ensure the successful implementation of the Plan?

- 2.1 Welbeck supports the general intent of policy IM1, and is of the view that it should provide an appropriate framework to keep the plan 'on track.'
- 2.2 Welbeck does, however, suggest that the policy requires two additional elements. The first is a commitment to general review in a specific timeframe to engage with changing housing needs, and the second is to manage an identified risk with the deliverability of strategically significant homes at Wareham.

General Review

- 2.3 It is noted that policy H1 provides for a plan review "at least every five years and housing delivery will be monitored annually," however, as Welbeck has explored in response to the Inspector's Matter B, there is a pressing need to engage with the changing circumstances. The standard methodology for housing need identifies a higher requirement for new homes; the potential unmet needs from Bournemouth, Poole and New Forrest; and, the fact that the emerging plan for the Dorset unitary authority is embryonic at best, all point to the need for some certainty to be included in the implementation strategy.
- 2.4 Welbeck suggests that an additional appropriate trigger is included in either policy H1 or IM1 to ensure that the plan is able to respond effectively and pro-actively to changing circumstances, and it is not left purely to the necessity of an NPPF compliant review. It is suggested that a trigger is included that requires engagement with neighbouring authorities to understand their unmet needs, and this in line with the new standardised methodology figures, in the next two years. This is considered a reasonable timeframe, given a) that understanding the need for new homes is an issue that has been simplified by the revised NPPF; b) the emerging unmet needs of neighbouring authorities are becoming clearer all the time; and, c) the intention is stated to be to start the Dorset Local Plan this year (2019) and so engaging with these issues should be easily achievable if momentum is maintained.

Wareham specific implementation

- 2.5 Welbeck has identified some serious concerns with the Wareham Neighbourhood Plan and its reliance on undeliverable redevelopment sites and unpredictable windfall. If the Wareham Neighbourhood Plan currently under consultation (or its intended successor which is the only means suggested for delivering the housing at Wareham through allocations) is either not made, delayed or otherwise rendered ineffective, then the delivery of the overall strategy for Purbeck is at serious risk. The Wareham 'portion' represents more than 10% of the overall new homes strategy for Purbeck.
- 2.6 Specific policies for allocating land for the strategic housing needs of Wareham should be included in the Local Plan. Once these are included a subsequent mechanism for correcting the potential situation of non-delivery of housing at Wareham can be addressed. Without such a mechanism, the delivery of much

needed housing at Wareham has the potential to be seriously delayed, or indeed delivered by appeal.

Issue 2: Monitoring

Q1. Does the Plan make appropriate provision for monitoring the effectiveness of its implementation?

- 2.7 Welbeck is of the view – as described above – that there are two serious omissions to the implementation strategy, and therefore also the monitoring.
- 2.8 Welbeck suggests that close monitoring of the Wareham Neighbourhood Plan, in particular, is critical to the overall delivery of the Purbeck Local Plan strategy. The Wareham requirement is over 10% of the overall housing target. If the NP does not deliver against that target this will put the whole area's land supply at significant risk. A 'fail safe' should be included that either allocates a proportion of that housing requirement now, in this Local Plan, or reserves sites in the event of non-delivery of development sites in the Neighbourhood Plan.
- 2.9 In terms of the overall housing need requirement changes, Welbeck understand that this is a material change in circumstance and could trigger a plan review in its own right. However, in the interests of good proactive planning it is suggested that the trigger points suggested above are included in the monitoring framework – especially triggers that involve out puts from the Duty to Cooperate, regarding unmet need.

Q2. Is the change (MM22) to the monitoring framework indicated in the schedule of possible modifications [SD14] necessary to ensure the Plan makes appropriate provision for monitoring the effectiveness of its implementation?

- 2.10 The proposed modification to the monitoring of policy H8 is welcomed. This modification points towards two issues that Welbeck has raised in its submissions: first; the unpredictable nature and impact of windfall sites and second; the strategic nature of SANG as mitigation. Welbeck agrees that small sites and windfalls need to be regularly monitored for their impacts and cumulatively should provide proportionate mitigation (or financial contributions towards mitigation) as appropriate.