

SD91- Council response to Inspector's Actions: 8, 9, 10

Introduction

1. The accompanying schedule has been prepared in response to Actions 8, 9 and 10 [SD84], which arise from the first week (2nd and 5th July 2019) of examination hearings into the Purbeck Local Plan. The relevant actions are listed below:
 - Action 8 – ‘Review whether all policies are truly ‘strategic’ policies’
 - Action 9 – ‘Review wording of strategic policies or supporting text to make it clear where neighbourhood plans could provide for a different approach, based on local evidence’
 - Action 10 – ‘Check the wording of strategic policies to ensure no conflict with the emerging Wareham Neighbourhood Plan, and discuss the matter of Green Belt release’
2. The Council arranged to meet (12th July 2019) with the Steering Group for Wareham Neighbourhood Plan to discuss the categorisation of policies in the Purbeck Local Plan as either strategic or non-strategic, whether strategic policies in the Purbeck Local Plan were likely to create conflict with adopted/emerging/future neighbourhood plans and possible modifications to avoid conflicts between policies.

Summary

3. The schedule below summarises the Council's re-consideration as to whether a policy in its plan is strategic/non-strategic and then addresses Actions 9 and 10. To address conflict between strategic and non-strategic policies the Council has suggested a number of modifications to policies and supporting text. These have been summarised in the schedule and presented in an updated listed of modifications to the Purbeck Local Plan.
4. The parties still disagree around:
 - Policy H8 – the Council considers that the policy should remain strategic. The parties have each suggested a further amendment to Policy H8 to address potential conflict with non-strategic policies; and
 - Policy I4 - to avoid confusion the Steering Group considers that the Council should identify further ‘strategic’ open space in Wareham so that the emerging neighbourhood plan and Purbeck Local Plan are consistent with one another. The Steering

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Group considers that there are some inconsistencies in the Council's approach to identifying significant open space and that the differences between the plans are likely to create confusion in decision making. The Steering Group specifically referenced the playing fields that can be accessed off Worret Road that formally related to Wareham Middle School.

Schedule prepared in response to Actions 8, 9 and 10

Policy	Strategic/non-strategic	In general conformity with the Wareham Neighbourhood Plan, and subsequent neighbourhood plans.	Suggested modifications to policy or supporting pre-amble to avoid conflict with local neighbourhood development plan policies.
V1	Strategic – sets out the Council's overall spatial strategy for sustainable communities.	In conformity with Policy H1 of the emerging Wareham Neighbourhood Plan. No identified conflict with other emerging neighbourhood plans.	N/A (subject to improved wording in MM23)
V2	Strategic – linked to the Council's spatial strategy. The policy describes the changes to Green Belt boundaries needed to fulfil the plan objectives around meeting housing need.	In conformity with Policy H4 of the emerging Wareham Neighbourhood Plan. No identified conflict with other emerging neighbourhood plans.	Possible change to Policy V2: 'Green belt boundaries have been amended at Lytchett Matravers and Uton and Wareham to support sustainable development. This policy also establishes the need for changes to green belt boundaries around Wareham in the broad location identified on the policies map. An amendment to the boundary has been made through this plan in order to allocate land for development. Any further detailed amendments to boundaries will be established

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Policy	Strategic/non-strategic	In general conformity with the Wareham Neighbourhood Plan, and subsequent neighbourhood plans.	Suggested modifications to policy or supporting pre-amble to avoid conflict with local neighbourhood development plan policies.
			through the Wareham Neighbourhood Plan.'
E1	Strategic – policy aims are connected with achieving high quality development that takes account of objectives connected with the AONB and provides a framework for assessing the effects of development on non-designated landscape.	In conformity with policies in the emerging Wareham Neighbourhood Plan.	N/A
E2	Non-strategic – policy aims are connected with achieving high quality development with specific reference to heritage assets.	Local policy.	N/A – non-strategic policy.
E3	Non-strategic – policy aims are connected with securing development on suitable sites (have regard to specific criteria) that contributes toward the mitigation of climate change.	Local policy.	N/A – non-strategic policy.
E4	Strategic – policy requirements are connected with an overall strategy that is linked to achieving high quality development and securing	No conflict with emerging neighbourhood plans. The Council has taken account of local evidence around flood risk when preparing/reviewing its	N/A

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Policy	Strategic/non-strategic	In general conformity with the Wareham Neighbourhood Plan, and subsequent neighbourhood plans.	Suggested modifications to policy or supporting pre-amble to avoid conflict with local neighbourhood development plan policies.
	development/land uses that are adapted to climate change.	level 1 Strategic Flood Risk Assessment.	
E5	Strategic – as above in respect to E4.	No conflict identified with emerging neighbourhood plans	N/A
E6	Strategic – the policy sets out an overarching framework, relates to the entire Purbeck area, supports the Council's wider objectives around securing development/land use which is adapted to climate change and is linked to achieving high quality development.	No conflict identified with emerging neighbourhood plans.	N/A
E7	Strategic – the policy sets out an overarching direction/objective and reflects the requirements arising from the Habitats Regulations 2017.	No conflict identified with emerging neighbourhood plans.	N/A
E8	Strategic – as above in respect to E7.	No conflict identified with emerging neighbourhood plans.	N/A
E9	Strategic – as above in respect to E7.	No conflict identified with emerging neighbourhood plans.	N/A

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E10	Strategic – whilst the title in the pre-able to the policy refers to local biodiversity and geodiversity the policy sets out an overarching direction and requirements which seeks to shape development across Purbeck.	No conflict identified with emerging neighbourhood plans.	N/A
E11	Non-strategic – the policy relates to specific sewage treatment and pumping stations in Purbeck.	No conflict identified with emerging neighbourhood plans.	N/A
E12	Strategic – policy sets overarching direction/objectives in respect to design, seeking to shape the broad characteristics of development without being overly prescriptive.	No conflict identified with emerging neighbourhood plans. Local policies may provide additional detail, set out a distinctive approach or set local requirements where justified with suitable evidence.	Suggested insertion at the end of paragraph 105 to clarify the relationship between the policy and local policies in neighbourhood development plans: 'Local planning policies in neighbourhood development plans may provide additional detail around locally distinctive characteristics, set out a distinctive approach or set local requirements where justified with suitable evidence.'

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H1	Strategic – sets out the overall housing requirement for Purbeck.	No conflict identified with emerging neighbourhood plans.	Insert table (Table 2) presented in the Council's statement made in response to Question 6, Issue 1, Matter B, and indicate that the latest information can be found on the Council's website.
H2	Strategic – identifies housing land supply to meet the areas housing needs	No conflict identified with emerging neighbourhood plans.	N/A
H3	Strategic – the policy supports the Council's strategic objectives around meeting Purbeck's housing requirement.	No conflict identified with emerging neighbourhood plans.	N/A
H4	Strategic – the policy supports the Council's strategic objectives around meeting Purbeck's housing requirement.	No conflict identified with emerging neighbourhood plans.	N/A
H5	Strategic – as above in respect to H4.	No conflict identified with emerging neighbourhood plans.	N/A
H6	Strategic – as above in respect to H4.	No conflict identified with emerging neighbourhood plans.	N/A
H7	Strategic – as above in respect to H4.	No conflict identified with emerging neighbourhood plans.	N/A

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H8	Strategic – the policy supports the Council's overarching objectives around meeting Purbeck's housing need.	<p>Potential conflict with Policy H1 of the emerging Wareham Neighbourhood Plan and Policy 4 in the draft Arne Neighbourhood Plan.</p> <p>Both parties understand one another's position on this matter. Changing the status of the policy to local could undermine the Council's strategy for meeting its housing requirements if Neighbourhood Plans do not include such opportunities through site allocations or criteria-based policies. Applications for small sites will need to be considered against the criteria in the policy and all other relevant policy considerations (taking Wareham as an example</p>	<p>No agreement reached.</p> <p>The WNPSG suggested modification is an additional criterion:</p> <p>'(d) the site does not lie within a Neighbourhood Plan area where small sites have been either been allocated to meet identified housing needs, or where site allocations are being proposed and the plan has reached pre-submission consultation stage.'</p> <p>The Council suggest as an alternative to the draft clause:</p> <p>'(d) the site does not lie within a Neighbourhood Plan area where small sites have been allocated to meet identified housing needs <u>in a made Neighbourhood Plan.</u>'</p>

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		<p>there is likely to be very limited opportunity to deliver small sites around the town because of other relevant planning considerations). However it also undermines the ability for Neighbourhood Plans to take a lead on which of these sites may be most appropriate as it negates any incentive for developers to promote such sites through the NP process.</p>	
H9	<p>Strategic – the policy supports the Council's overarching objectives on delivering the sizes and types of homes needed across Purbeck.</p>	<p>Potential conflict with Policy H2 of the emerging Wareham Neighbourhood Plan and Policy 1 in the draft Arne Neighbourhood Plan.</p>	<p>Insert above the last paragraph of Policy H9:</p> <p>'Meeting local needs Local policies in neighbourhood development plans should support the general principles around providing the sizes and types of homes needed in Purbeck. Where justified with suitable evidence, local policies may set distinct local</p>

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Policy	Strategic/non-strategic	In general conformity with the Wareham Neighbourhood Plan, and subsequent neighbourhood plans.	Suggested modifications to policy or supporting pre-amble to avoid conflict with local neighbourhood development plan policies.
			requirements on the mix of different sizes and types of homes.'
H10	Strategic – the policy supports the Council's overarching objectives on delivering size and types of homes needed across Purbeck.	Potential conflict with policies in emerging neighbourhood plans.	Insert above the last paragraph of Policy H10: 'Meeting local needs Local policies in neighbourhood development plans should support the general principles around providing accessible homes needed in Purbeck. Where justified with suitable evidence, local policies may set distinct local requirements on the proportions and optional design requirements for accessible homes in new housing development.'
H11	Strategic – the policy supports the Council's overarching objectives on delivering affordable homes needed in Purbeck.	Potential conflict with policies in emerging neighbourhood plans. The Council recognises that Policy H11 is prescriptive around the tenure mix of affordable	Insert in the last paragraph of Policy H11: To reflect the latest evidence of housing need and national policy, the Council will seek to secure the following tenure mix for affordable housing provision, which will provide 10% of affordable home ownership

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		<p>homes. The Council considers that its policy is justified (given the need for affordable housing in Purbeck) and effective. The drafting of the policy also reflects, and seeks to address, responses from local communities around affordable housing (in particular when this matter was consulted upon in the New Homes for Purbeck consultation).</p>	<p>overall (to include intermediate tenures such as shared ownership, discount market value and starter homes). Any variation to the identified tenure mix will be considered on specific sites, in consultation with the Council's housing strategy team and registered providers, where necessary to secure the most appropriate and deliverable mix of affordable housing tenures. If calculating the proportions of different types of affordable homes gives part of a new home, the Council expects the proportion to be rounded up, to one decimal place.</p> <p>Local policies in neighbourhood development plans should support the general principles around providing the types of homes needed in Purbeck. Where justified with suitable evidence, local policies may set distinct local requirements on the tenure mix for affordable housing provision. In all other instances the following mix of affordable housing is required:</p>

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H12	Non-strategic – the policy relates to local community needs for affordable homes in Purbeck.	<p>No conflict identified with emerging neighbourhood plans.</p> <p>The WNPSG would be concerned if this policy were strategic as it would unnecessarily prohibit rural exception sites being promoted through the Wareham Neighbourhood Plan should such an opportunity or need arise in the future.</p>	N/A
H13	Non-strategic – the policy relates to local community needs for rural workers' homes in connection with rural businesses in Purbeck.	No conflict identified with emerging neighbourhood plans.	N/A
H14	Non-strategic – the policy seeks to address some of the economic and social effects of second home ownership across the Area of Outstanding Natural Beauty in Purbeck.	No conflict identified with emerging neighbourhood plans.	N/A

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H15	Strategic - the policy supports the Council's overarching objectives on delivering suitable pitches/plots for gypsies, travellers and travelling show people.	No conflict identified with emerging neighbourhood plans.	N/A
EE1	Strategic – the policy supports the Council's overarching objectives in respect to supporting economic growth and creating opportunities for employment.	No conflict identified with emerging neighbourhood plans.	N/A
EE2	Strategic – the policy provides overarching direction on the distribution of new employment uses in support of the Council's strategic spatial strategy.	No conflict identified with emerging neighbourhood plans. Local planning policies in neighbourhood development plans may be in general conformity with policy EE2 by allocating further sites for employment uses where they support the general principle of the Council's policy and are justified with appropriate evidence.	N/A

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Policy	Strategic/non-strategic	In general conformity with the Wareham Neighbourhood Plan, and subsequent neighbourhood plans.	Suggested modifications to policy or supporting pre-able to avoid conflict with local neighbourhood development plan policies.
EE3	Non-strategic – the policy identifies local and town centres in individual settlements across Purbeck.	<p>No conflict identified with emerging neighbourhood plans.</p> <p>The Wareham Neighbourhood Plan Steering Group and the Council should co-operate with one another to ensure that the policies map showing town/local centres in Wareham in the Purbeck Local Plan is consistent with the map in the Wareham Neighbourhood Plan.</p>	The policies map will be amended to reflect the boundaries for Wareham Town Centre and Carey Road Shops shown in the Wareham Neighbourhood Plan.
EE4	Non-strategic – the policy provides specific direction for decision makers around tourist accommodation.	No conflict identified with emerging neighbourhood plans.	N/A
I1	Strategic – outlines the infrastructure needed to support the development in the Purbeck Local Plan.	No conflict identified with emerging neighbourhood plans.	N/A
I2	Strategic – supports the Council's overarching objectives	Potential conflict with Policy H2 of the emerging	Insert after, or as part of paragraph 245:

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Policy	Strategic/non-strategic	In general conformity with the Wareham Neighbourhood Plan, and subsequent neighbourhood plans.	Suggested modifications to policy or supporting pre-amble to avoid conflict with local neighbourhood development plan policies.
	relating to improving accessibility and transport.	Wareham Neighbourhood Plan.	'Local planning policies relating to car parking standards should support, and uphold, the general principles in Policy I2 and national planning policy. The Bournemouth, Poole and Dorset Residential Car Parking Strategy and non-residential parking guidelines provide guidance on meeting the requirements in Policy I2. Where justified with appropriate evidence, and consistent with national planning policy (relating to accessibility of the development, type/mix/use of development, availability/opportunities for public transport, local car ownership levels and the need to provide spaces with charging points for electric/ultra-low emission vehicles), local policies in neighbourhood development plans may specify distinct local requirements for vehicle parking.'
I3	Strategic - supports the Council's overarching objectives	Policies in neighbourhood development plans may	Insert after, or as part of paragraph 249:

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	relating to health/wellbeing, adapting to the effects of climate change, managing flood risk and enhancing biodiversity.	provide additional detail, or a distinctive local approach, without undermining the requirements in the policy provided the approach in the neighbourhood development plan is justified with suitable evidence.	'Local planning policies relating to green infrastructure should support, and uphold, the general principles in Policy I3 and national planning policy. Local Green Spaces in neighbourhood development plans may positively contribute toward the objectives in the Council's developing Green Infrastructure Strategy.'
I4	Strategic – supports the Council's overarching objectives relating to high quality design and health/wellbeing.	Potential conflict with policy I4 of the emerging Wareham Neighbourhood Plan and Policy 12 of the draft Arne Neighbourhood Plan.	<p>Insert as part of paragraph 252:</p> <p>'Where justified with appropriate evidence, and consistent with national planning policy, local planning policies in neighbourhood development plans may seek to identify and protect important Local Green Space.'</p> <p>The WNPSG also suggest that the policies map should be amended to reflect the LGS shown in the Wareham Neighbourhood Plan.</p>

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15	Strategic – supports the Council's approach to mitigating/avoiding the effects of development in the Council's strategies on European sites.	No conflict identified with emerging neighbourhood plans.	N/A
16	Strategic – relates to delivery of wider objectives around health/social care infrastructure.	No conflict identified with emerging neighbourhood plans (Policy GS2 of the emerging Wareham Neighbourhood Plan includes more detailed planning policies relating to this matter).	N/A
17	Non-strategic – outlines a framework for delivery, retention and replacement of important local facilities and services.	No conflict identified with emerging neighbourhood plans.	N/A