

Dorset Council

Purbeck Local Plan (2018-2034)

Response to Inspector's Matters, Issues and Questions

Matter C: Green Belt

7 June 2019

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Matter: C

Issue 1: Green Belt

Question 1

Is the in-principle need to review the Green Belt fully evidenced and justified, effective and consistent with national policy including paragraphs 136 and 137 of the Framework?

1. Yes. The Council has presented its examination of other reasonable options for meeting Purbeck's development needs in its housing background paper [SD19]. The Council has undertaken a thorough search for sites across Purbeck to minimise development in the Green Belt, and this has included a review of the opportunities for meeting need on previously developed land. The findings of the Green Belt study informed various stages of the site selection process and were given significant weight in the decision-making process. When coming to a judgement on the sites to be allocated in the Purbeck Local Plan, the Council sought to identify sites for allocation which supported the overall strategy of spreading development across the plan area as much as possible.
2. As part of this examination of alternatives the Council has considered:
 - a) what constitutes the most appropriate housing strategy for the area - the Council consulted on alternative strategies for meeting the area's housing requirements and selected a strategy that required changes to the Green Belt. The reasons are summarised in paragraphs 71, 88 and 91 of [SD19];
 - b) the opportunities for using as much brownfield and underutilised land in its strategies as possible (the Council's strategy includes sites on its brownfield register but these do not have capacity to meet all of the area's housing requirements, paragraph 75 SD19);
 - c) effective use of land (the Council's response to Question 4, Issue 1 of Matter E explains why it considers the estimates of the number of homes which can be delivered on the allocated housing sites are reasonable having regard to their surroundings and the function of undeveloped land within sites in respect to wildlife/recreation/drainage and flood risk management, paragraph 76 SD19);
 - d) opportunities for development in town centres (the Council's Strategic Housing Land Availability Assessment (SHLAA) does not identify any suitable or available development sites in town centres); and
 - e) in line with national guidance (NPPF para 137 (c)), the Council formally sought assistance from neighbouring authorities¹ to help Purbeck District in meeting its

¹ The Council sent letters and e-mails (Appendix 1) on the 17th July 2018 to the following councils: Borough of Poole, Bournemouth Borough Council, Christchurch Borough Council, Dorset Council Partnership (comprising North Dorset District Council and West Dorset District Council and Weymouth & Portland Borough Council), East Devon District Council, East Dorset District Council, New Forest District Council, South Somerset District Council and Wiltshire Council.

requirement for homes over the plan period. The Council received responses from Borough of Poole, Bournemouth Borough Council, Christchurch Borough Council, East Devon District Council, New Forest District Council, North Dorset District Council, South Somerset District Council and West Dorset District Council, confirming that they would not be able to contribute towards meeting Purbeck's housing requirement as a result of similar constraints and difficulties. (Paragraph 77 SD19 refers). (Appendix 2 includes copies of the responses from these councils).

3. Having considered all reasonable alternatives, as summarised above, the Council has concluded that exceptional circumstances exist to justify changes to Green Belt boundaries. These exceptional circumstances are summarised in paragraph 47 of the submitted Purbeck Local Plan [SD01a].
4. The Council is not proposing changes to Green Belt boundaries at Frenches Farm for a care home as it considers that there are opportunities for achieving sustainable mixed use (incorporating care homes) development on the housing sites around Moreton Station/Redbridge Pit and Wool (paragraph 86 SD19).

Question 2

Have exceptional circumstances been demonstrated to justify the alterations to the boundary of the Green Belt as proposed in the Plan to provide for housing development at Lytchett Matravers, Upton and Wareham and the Morden Park strategic alternative natural green space (SANG) and holiday park (Policy I5)?

5. Yes. Protection of the Green Belt is one of the Council's main concerns. However, the Council considers that the need to promote sustainable patterns of development to meet objectively assessed needs over the Plan period are best achieved through the limited release of land from the Green Belt. It considers that exceptional circumstances exist that justify changes to the Green Belt. These support wider strategic development goals. In reviewing existing Green Belt boundaries the Council has had careful regard to the need to promote sustainable patterns of development in terms of proximity to existing built up areas that are served by public transport.
6. The Council is proposing to remove land from the Green Belt at Lytchett Matravers, Upton and Wareham to support the overall strategy of spreading housing development across the plan area. As explained in the Housing Background Paper [SD19], the Council could theoretically deliver Purbeck's local housing need without making changes to Green Belt boundaries, by concentrating development in Wool and Moreton Station / Redbridge Pit. The Council does not consider that this is an appropriate option for meeting Purbeck's housing requirement. The strategy that it has selected will:
 - a) deliver a spread of new homes across the plan area, where they are needed;
 - b) deliver a resilient supply of new homes;
 - c) limit the impacts of new homes on existing infrastructure; and
 - d) provide an opportunity to maintain and enhance rural communities.

7. The Council undertook a comprehensive Green Belt assessment guided by national planning policy [SD51]. This provides a robust assessment of the performance of the Green Belt against the five purposes and is considered to be of sufficient level of granularity to inform the site assessment process. Part 2 of the Council's Green Belt study [SD51] summarises its consideration of whether there are exceptional circumstances for changes to Green Belt boundaries. Appendix 2 of the study describes the exceptional circumstances for changes to Green Belt boundaries around Lytchett Matravers (Blaney's Corner, Sunnyside Farm and Land to the East of Wareham Road), Upton (land to the South of Policeman's Lane and Frenches Farm), Wareham (land adjacent to Carey Road and land north of Bere Road) and Morden. This appendix also includes detailed assessments on the performance and functioning of Green Belt land where the Council has found exceptional circumstances.
8. Taking account of the Green Belt function the exceptional circumstances for release of Green Belt land at Lytchett Matravers (Blaney's Corner, Sunnyside Farm and Land to the east of Wareham Road) are as follows:
 - a) encouraging sustainable patterns of growth – removing land around Lytchett Matravers focuses new homes in a sustainable location where residents will have access to existing services and facilities (paragraph 66 SD51);
 - b) removing the land around Lytchett Matravers from the Green Belt will not irrevocably harm its function or purpose – the sites are modest parcels of land which are closely related to the existing village and some distance from the edge of the large built-up area (paragraphs 70 and 72 SD51); and
 - c) new homes will confer compensatory improvements to offset harm to the Green Belt – a SANG will be delivered to the north of Lytchett Matravers which will be managed to encourage recreational use by the occupiers of the proposed new homes and existing residents (paragraph 74 SD51).
9. The exceptional circumstances for release of Green Belt land at Upton can be summarised as follows:
 - a) encouraging sustainable patterns of growth – removing land around Upton focuses new homes in a sustainable location where residents will have access to existing services and facilities (paragraph 67 SD51); and
 - b) removing the land around Upton from the Green Belt will not irrevocably harm its function or purpose – the site is a modest parcel of land which is closely related to the existing town and defined by physical boundaries which are likely to remain permanent and contain further encroachment (paragraph 71 SD51).
10. The exceptional circumstances for release of Green Belt land at Wareham (land adjacent to Carey Road and to the west of Westminster Road Industrial Estate) can be summarised as follows:
 - a) encouraging sustainable patterns of growth – removing land around Wareham focuses new homes in a sustainable location where residents will have access to existing services and facilities (paragraph 68 SD51);

- b) removing the land around Wareham from the Green Belt will not irrevocably harm its function or purpose – the site is a modest parcel of land which is closely related to the edge of the existing town. It is not related to the edge of the large built-up area. The landform on the site adjacent to Carey Road and to the west of Westminster Road Industrial, encloses and contains the site. This topography is likely to act as a permanent boundary which contains further development; and
 - c) new homes will confer compensatory improvements to offset harm to the Green Belt – a SANG will be delivered around Wareham which will be managed to encourage recreational use by the occupiers of the proposed new homes and existing residents.
11. The exceptional circumstances for release of Green Belt land for a ‘holiday park’ at Morden can be summarised as follows:
- a) the landowner has committed to delivery of a strategic SANG – the SANG would mitigate/avoid the adverse effects arising from windfall residential development and underpin the delivery of sustainable housing in this part of Purbeck (paragraphs 145 and 146 SD51);
 - b) the holiday park will confer compensatory improvements to offset harm – improved accessibility into the SANG (paragraphs 147, 148 and 149 SD51); and
 - c) positive environmental management - the landowner has also committed to a programme of positive environmental management within the holiday park to remove invasive species and promote ecological diversity.

Question 3

Is policy V2 (Green Belt) consistent with national policy in so far as it relates to the purposes of the Green Belt? If not, would the change to the policy (MM2) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?

12. Commenting on the publication draft Purbeck Local Plan, neighbouring borough councils, (Bournemouth Borough [1051470] and Borough of Poole [1021364] – now forming part of Bournemouth, Christchurch Poole Council), submitted a joint response. The representation maintained that clause a. of Policy V2 is not consistent with national planning policy relating to the Green Belt as it fails to take into consideration those circumstances when changes to Green Belt boundaries can be justified (it is suggested that as drafted Policy V2 is not consistent with the first of the five Green Belt purposes “to check the unrestricted sprawl of large built up areas” (NPPF para 134a), and would restrict further development in the Green Belt even in those cases where there are exceptional or very special circumstances sufficient to justify Green Belt release).
13. Whilst satisfied that the submitted plan is sound, the Council recognises that the wording used in part (a) of policy V2 is capable of being interpreted in a more restrictive way than is intended by the NPPF. It has therefore tabled a schedule of possible modifications that includes the change suggested in Bournemouth Borough and Borough of Poole Councils’ response for consideration through the examination

process. The Council considers that as drafted the change suggested (MM2) is consistent with national planning policy.

Question 4

Is the creation of suitable alternative natural greenspace (SANG) to offset the impact of removing land from the Green Belt at Lytchett Matravers and Wareham justified? If so, is the wording of policy V2 in relation to this matter sufficiently clear and robust as to be effective?

14. In proposing revisions to existing Green Belt boundaries the Council is required to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the quality and accessibility of remaining Green Belt land (NPPF para 138 refers). The Council has identified that the proposed SANGs associated with the housing allocations at Lytchett Matravers and Wareham can provide compensation for removing land from the Green Belt. They are also required to avoid/mitigate the adverse effects from new homes allocated around Lytchett Matravers (in the Council's local plan) and Wareham (in the Wareham Neighbourhood Plan) on European sites (including Dorset Heathlands).
15. Nearly a quarter of the District is covered by national and international nature conservation designations including sites of special scientific interest (SSSIs), special protection areas (SPAs), special areas of conservation (SACs) and Ramsar sites. The residential site allocations identified will not have the capacity to accommodate the required level of natural green space within the site boundaries to avoid/mitigate the effects of residential development on European sites. The provision of alternative recreational land is therefore needed to attract new residents away from the protected sites and can be considered as a mechanism for avoiding harm. A combination of SANGs and Strategic Access Management Measures (SAMMs) are required to address the recreational impacts of residential growth and development.
16. SANGs necessarily need to: replicate the characteristics of Dorset Heathland sites (being open natural spaces free from development), be accessible and incorporate a circular walk to address the adverse effects from the new homes allocated in the Council's local plan. The Dorset Heathlands Planning Framework 2015 – 2020 has been adopted by the Council as supplementary planning document. Appendix E provides 'Guidelines for the establishment of Suitable Accessible Greenspace (SANG) Quality Standards for the Dorset Heaths'. These 'quality standards' relate to:
 - a) landscape characteristics – the guidelines suggest that in order to be effective SANGs need to be perceived as natural spaces (as such their character should not be defined by intrusive artificial features – including building or noise connected with vehicles or industrial sources) and provide a variety of habitats for visitors to experience (for example woodland, scrub, grassland, heathland, wetland and open water);
 - b) the physical infrastructure needed for access – including the opportunity to provide parking facilities, achieve a safe access and provide easy access between the development/parking facility and the SANG;

- c) the physical infrastructure needed to support their use – the SANGs should be sufficient size and shape to permit a choice of ‘safe’ circular walks (ranging in distance between 2.5 and 5km), include water bodies for dogs to swim in, include refuse bins for dog waste and incorporate large open areas where dogs can be safely let off the lead; and
 - d) signage and information boards – SANGs should be clearly signed and advertised to encourage use.
17. The open/naturalistic character of SANGs positively supports the fundamental aim (of keeping land permanently open – paragraph 133 NPPF) and one of the Green Belt’s purposes (paragraph 134 (c) NPPF).
18. SANGs at Lytchett Matravers and Wareham will form part of the area’s network of green infrastructure – serving a recreational function and addressing the effects of residential development on Dorset Heathlands. The Council considers that SANGs are appropriate development in the Green Belt (paragraph 146 (e) NPPF) and for these reasons proposals to form a SANG do not require justification as inappropriate development or for the Council to consider changes to Green Belt boundaries. SANGs need to be identified to ensure there is sufficient recreational land provision close to the housing allocations to draw visitors away from European sites. Delivering SANGs and the commitment to a recreational mitigation strategy (to include SAMM and SANGs, as outlined in supplementary planning guidance), supports the Council’s responsibility to plan positively to enhance the beneficial use of the Green Belt (paragraph 141 NPPF).
19. The Council considers Policy V2 is justified; the policy approach taken representing an appropriate strategy having taken into account reasonable alternatives, and is based on proportionate evidence. The wording of policy V2, when read in conjunction with the supporting reason justification text (paragraphs 45 to 48), is considered to be sufficiently clear and robust to be effective on this matter and capable of being delivered over the plan period.
20. Policy V2 specifically refers to the SANGs relating to the new homes being allocated at Lytchett Matravers (through the Local Plan) and Wareham (through the Neighbourhood Plan). SANGs have, or will, also be secured in the Green Belt around Upton and at Morden. These SANGs will also enhance the beneficial use of the Green Belt.

Appendix 1: Text for letters and e-mails sent to neighbouring councils

Dear *(add name of Chief Executive)*

Purbeck Local Plan

Purbeck District Council is currently reviewing its local plan. The Council intends publishing the Pre Submission Draft for representations in the autumn prior to formally submitting the plan to the Secretary of State in March 2019 for independent examination.

The Council intends to fully meet its objectively assessed housing number up to 2034, the period covered by the new Purbeck Local Plan. A 'New Homes for Purbeck' consultation was held earlier this year which focussed on housing related issues and which sought views on three spatial options for meeting future housing growth across the District. The consultation results showed a clear preference for the option which has the widest geographical spread of new housing across the District. However, to fully implement this option would necessitate limited release of some existing areas of green belt land for housing development.

The Council is satisfied that, in pursuing its favoured spatial strategy, it is able to present a robust and defensible case, demonstrating exceptional circumstances exist to justify limited release of existing green belt land. However, in order to inform the making of this case I am writing to ask whether your authority is able to accommodate some of Purbeck's identified need for housing development in accordance with the Government's guidance given in paragraph 136 of the consultation draft (March 2018) National Planning Policy Framework.

I would be very grateful if your Council could consider this request and respond promptly either way by Friday 27th July. Should you be in a position to potentially assist in this matter I would be grateful if you could contact Ken Bean, Interim Planning Policy Manager at Purbeck (kenbean@purbeck-dc.gov.uk 01929557339) to discuss the details.

Yours sincerely

Steve McKenzie

A) Cover email to existing Dorset authorities

You will be aware that Purbeck District Council is progressing work on producing a new Purbeck Local Plan which we intend submitting for examination before the end of March next year. As explained in the attached letter, in terms of future housing growth through the draft plan, we will be pursuing an option which requires development of some land that is currently green belt. As mentioned at the Strategic Planning Forum meeting held on 19th June, we are now formally writing to ask whether your authority is able to assist us in meeting our identified housing need and thereby reduce the need to remove and then subsequently develop existing green belt land.

B) Cover email to authorities that will be neighbours to the new Dorset Authority

Purbeck District Council is progressing work on producing a new Local Plan that will cover the existing local authority area. As you will be aware, from April next year this Council will become part of the new Dorset Unitary but the intention is that the plan that we are currently drafting will, having reached the advanced submission stage by that time, be progressed by the new authority to adoption.

As explained in the attached letter, in terms of accommodating future housing growth and fully meeting our objectively assessed need figure, the Council is pursuing a spatial strategy that includes the need to make some limited modifications to existing green belt boundaries in order to

enable residential development in a few areas of the District. You are probably aware that the Government's national planning guidance advises that in being able to demonstrate exceptional circumstances to justify changes to Green Belt boundaries, discussions should have first taken place with neighbouring authorities to establish whether they could accommodate some of the identified need for development. Therefore, as by the time the Purbeck Local Plan reaches examination stage your authority will be a neighbouring authority, I am formally writing to you now about this matter to ascertain whether you can assist us in meeting our identified housing need.

Appendix 2: Responses from neighbouring councils

Your ref:
Our Ref:

This matter is being dealt with by: Jane Portman
e-mail: Jane.portman@bournemouth.gov.uk | Direct line: 01202 451130

Mr Steve MacKenzie
Chief Executive
Purbeck District Council
Westport House
Worgret Road
Wareham BH20 4PP

8th August 2018

Dear Steve,

RE: Purbeck Local Plan

I refer to your letter dated 17th July 2018, regarding the above.

I have discussed the matter with my Head of Planning, Transport & Regulation and appreciate the issues arising in respect of accommodating new housing within the Purbeck District.

As the Purbeck Local Plan is running ahead of the Bournemouth Local Plan review due to the timings of the adoption of the existing plans, you will appreciate that we have yet to fully complete any detailed analysis regarding urban capacity. Therefore the following observations are not founded on up to date robust evidence. However, whilst we have been able to achieve our required housing numbers to date, given the fact that the Eastern Dorset SHMA is also indicating a level of need which will represent significant growth above and beyond the current housing targets for Bournemouth, the situation will prove more challenging.

To date we have relied on urban sites to provide our housing delivery and this has largely been derived from smaller brownfield opportunities. Given that the supply of brownfield sites is constrained to the existing urban area I consider that it is unlikely that Bournemouth will have the capacity to assist with meeting some of Purbeck's need as well as meeting the higher targets emerging from the revised NPPF housing methodology requirements.

I hope that the above comments are of assistance.

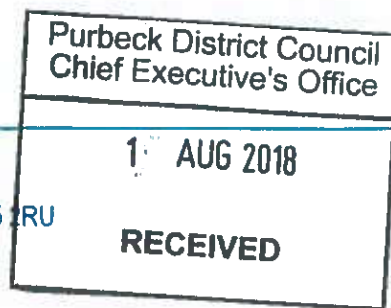
Yours sincerely


Jane Portman
Managing Director

Growth and Infrastructure

Section: Planning

Borough of Poole, Civic Centre, POOLE, BH15 2RU
 Tel: 01202 262000
 Text Relay: 18001 01202 262000
 Email: transportation@poole.gov.uk



Date: 26th July 2018
 Ref: SEM/arp
 Please ask for: Julian McLaughlin
 Direct Dial: 01202 262100
 Email: Julian.McLaughlin@poole.gov.uk

Dear Mr Mackenzie

Purbeck Local Plan

Thank you for your letter to Andrew Flockhart dated 17 July 2018; he has asked me to respond on his behalf. In terms of the matters raised, Borough of Poole is supportive of Purbeck District Council's (PDC) intentions to fully meet its objectively assessed housing needs up to 2034, and will continue to engage with your Members and Officers on an ongoing basis to assist where possible.

In response to your letter I can confirm, however, that Borough of Poole is unable to offer to accommodate any of Purbeck's identified housing need at the present time due to pressure on our own land supply.

Borough of Poole's Local Plan review (now subject to Examination in Public) identifies that urban capacity in Poole can deliver 12,900 homes against an objectively assessed housing need (OAHN) of 14,200, which leaves a shortfall of 1,300 dwellings. Borough of Poole proposes in its draft Local Plan to meet the shortfall by a careful release of Green Belt land within Poole's boundaries to ensure Poole's full OAHN can be met.

Furthermore, we note that the Government's standard housing methodology has now been released (24 July 2018), and using the current data would require Poole to deliver 782 homes per annum. This equates to an equivalent uplift of 1,152 over and above the 14,200 homes currently subject to Examination, which will need to be addressed at the next Local Plan review.

This highlights the issue Poole faces in finding land and accommodating its own needs within its boundaries, which remains challenging given our borough's physical and environmental constraints. The result of these constraints, in conjunction with Poole's housing needs, is that there is no residual land available in our borough to help accommodate Purbeck's housing needs.

Whilst not being able to accommodate any of Purbeck's housing needs, Borough of Poole can offer ongoing assistance to work together and consider strategic solutions that look at meeting housing needs across the housing market area. The primary mechanism for doing this is through the Dorset Strategic Planning Forum (SPF) of which Purbeck is an integral member.

Julian McLaughlin MSc, MCILT, MIHT
 Head of Growth & Infrastructure



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I trust the response in this letter clearly sets out Borough of Poole's position in respect of Purbeck's request. I am happy to meet with you to further discuss the response set out in this letter as required.

Yours sincerely



Julian McLaughlin
Head of Growth & Infrastructure

Julian McLaughlin MSc, MCILT, MIHT
Head of Growth & Infrastructure



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Christchurch and East Dorset District Council
 delivering services together
 Chief Executive's Office

Chief Executive's Office

Civic Offices
 Bridge Street
 Christchurch
 Dorset BH23 1AZ

1 AUG 2018

RECEIVED

Mr S Mackenzie
 Purbeck District Council
 Westport House
 Worgret Road
 Wareham
 Dorset
 BH20 4PP

Date: 19 July 2018
 Contact: David McIntosh
 Our Ref: CED/DM/MJE
 Your Ref: SEM/arp
 Phone: 01202 795166
 Email: dmcintosh
 @christchurchandeastdorset.gov.uk
 SMS: 07781 480191

Dear Steve

Ref: Purbeck District Local Plan Review & Duty to Co-operate

Thank you for your letter dated 17th July updating us on progress with your Local Plan Review and specifically on your strategy toward meeting housing needs.

As you say, housing needs are a considerable challenge for all authorities in this area, and we welcome your attempts to meet your District's housing needs within the District boundary, including through appropriate Green Belt release.

In terms of our Local Plan Review, we have completed our major evidence work and have just commenced our options consultations. These include draft housing strategies and broad locations for housing development across Christchurch and East Dorset.

We are basing our local plan work on the new Government methodology for calculating Housing numbers. In our case, this creates an annual housing need of 792 dwellings per annum across the Christchurch and East Dorset area, a significant increase from the 566 per annum which is the basis of the Core Strategy. This represents a figure of 15,840 dwellings over our Local Plan Review plan period 2013-2033.

Given the significant constraints across our area (designated heathland, green belt, areas of high flood risk and AONB) fully meeting our own housing needs will be very challenging. We have not yet arrived at firm figures for housing supply, but my estimate is that it is unlikely that we can fully meet our housing need without further Green Belt release. We certainly cannot meet it through urban housing potential alone.

In general terms therefore, I regret that we are unable to suggest land which is likely to be surplus to our housing supply requirements which can be brought forward to meet your authority's housing need.

I hope this information will be helpful and regret that we cannot be of more assistance.
I would be happy to discuss these issues in more detail.

Yours sincerely,



David McIntosh
Chief Executive
Christchurch and East Dorset Councils

Date: 31 August 2018
Direct phone: 01395 517519
Direct email: efreeman@eastdevon.gov.uk
Our ref: SEM/arp



Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset
BH20 4PP

Dear Mr Mackenzie

Purbeck Local Plan

I write further to your letter of the 17th July 2018 to our Chief Executive Mark Williams regarding the above mentioned matter.

The East Devon Local Plan was adopted in January 2016 and it makes provision to meet and exceed an objectively assessed housing need of 17,100 homes across the 2013 to 2031 period. East Devon District Council in conjunction with Exeter City Council and Teignbridge and Mid Devon district councils are now producing the Greater Exeter Strategic Plan (GESP), a plan setting out strategic policy for development across the four planning authority areas. Following on after GESP there will be a new local plan for East Devon, however production of a new local plan has not yet started.

GESP (and a replacement East Devon Local Plan) have not progressed to the stage of identifying appropriate housing requirements, a strategy for distribution or more detailed policy. It would be inappropriate, therefore, to pre-empt future choices and policy options by commenting in detail on possible cross boundary distribution of development. Regardless of this I am struggling to understand how as East Devon District Council we could possibly help with meeting Purbeck's housing need even if we were minded to do so given that your housing market area is entirely separate from our own and so any additional homes provided in East Devon would not meet the needs of Purbeck in any event.

Knowle, Sidmouth, EX10 8HL
DX 48705 Sidmouth
Phone: 01395 516551

Email: csc@eastdevon.gov.uk
eastdevon.gov.uk
[@eastdevon](https://www.facebook.com/eastdevon)

Download the free East Devon App
to access council services at
eastdevon.gov.uk/app

Notwithstanding these issues, I would regard it as highly unlikely that East Devon District Council would see it as appropriate or desirable for this Council to accommodate some of Purbeck's identified need for housing. Whilst East Devon has an adopted growth agenda, with major development on the western side of the district close to Exeter, it is important to note that significant constraints exist in the District, including two Areas of Outstanding Natural Beauty that cover around 2/3 of East Devon, European protected habitats, heritage coastline, issues with flooding and strategic highway capacity etc.

In conclusion there would appear to be no planning logic to accommodating Purbeck's housing need in East Devon nor is our future work likely to identify sufficient suitable land for development to accommodate such growth.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Freeman', with a long horizontal flourish extending to the right.

Ed Freeman

Service Lead – Planning Strategy and Development Management

Purbeck District Council
Chief Executive's Office

1 AUG 2018

RECEIVED



Chief Executive

Steve Mackenzie MBA CPFA
Chief Executive
Purbeck District Council
Westport House,
Worgret Road,
Wareham,
Dorset,
BH20 4PP

My Ref: BJ/DL
Your Ref: SEM/arp

25 July 2018

Dear Steve

Purbeck Local Plan

Thank you for your letter of 17th July 2018 regarding the Purbeck Local Plan and your Council's intention to publish the 'Pre-Submission Draft for representations in the Autumn.

I am pleased to note that it is your Council's intention to fully meet its objectively assessed housing number up to 2034. I also note that like this Council, to be able to address OAN you are intending to release land from the Green Belt to meet housing requirements. In our Local Plan Review 2016-2036 Part One Planning Strategy, which is currently published for the Regulation 19 stage representation period, prior to submission to the Secretary of State in the Autumn, we include proposals to develop 1525 homes on Green Belt land within our district. Accordingly it will come as no surprise to you when I inform you that this Council is not in a position to accommodate any of Purbeck's identified need for housing development.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Bob Jackson'.

Bob Jackson
Chief Executive

Tel: 023 8028 5588
bob.jackson@nfdc.gov.uk

newforest.gov.uk

Appletree Court, Beaulieu Road, LYNDHURST, SO43 7PA

Please ask for: Hilary Jordan
Direct Dial: 01305 252203
Email: hjordan@dorset.gov.uk



Our Ref:

1 August 2018

North Dorset District Council
 Nordon, Salisbury Road,
 Blandford Forum, Dorset DT11 7LL

Steve McKenzie
 Chief Executive
 Purbeck District Council
 Westport House
 Worgret Road
 Wareham
 Dorset BH20 4PP

Tel: 01258 454111
 Fax: 01258 480179
 Web: www.dorsetforyou.gov.uk

Dear Steve,

Purbeck Local Plan

Thank you for your letter of 17 July to Matt Prosser, Chief Executive, who has asked me to respond on his behalf.

North Dorset undertook an 'Issues and Options' consultation on its local plan review at the end of 2017. This identified a wide range of options for expansion around all the district's towns and invited comments on them. It did not specify the numbers of houses likely to be achieved on these sites, and we are still working on refining the list of sites in preparation for the next stage of 'preferred options' consultation.

North Dorset's existing local plan has an annual target of 285 homes per annum: the new methodology results in a significant increase in this figure, to 366 homes per annum. While the council anticipates meeting all its needs within its own boundaries, the challenge of meeting this target within a relatively constrained area means that it appears unlikely at this stage that North Dorset would also be able to meet some of Purbeck's need.

Yours sincerely

A handwritten signature in black ink that reads 'Hilary Jordan'.

Hilary Jordan
 Corporate Manager, Planning (Community & Policy Development)

Steve Boyt

From: Ken Bean
Sent: 25 July 2018 08:57
To: Libby Hodd
Subject: FW: Purbeck Local Plan

Please save this response in folder on shared drive. Can you let me know which one this is so I can ensure that other responses are saved in the same place when you are on leave.

From: Jo Wilkins [mailto:Jo.Wilkins@SouthSomerset.Gov.Uk]
Sent: 25 July 2018 08:35
To: Steve Mackenzie ; Ken Bean
Cc: Jan Gamon
Subject: Purbeck Local Plan

Dear Mr Mackenzie,

Thank you for your letter of 17 July 2018.

You have requested whether South Somerset District Council is able to accommodate some of Purbeck's identified need for housing development. This request is prompted by the Government's guidance in paragraph 136 of the consultation draft National Planning Policy Framework (NPPF), March 2018, which is now paragraph 137 of the NPPF, July 2018; and the planned formation of the two new unitary authorities in Dorset.

Paragraph 137 of the NPPF, July 2018 states the following:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

I note that your request is not accompanied by any evidence to demonstrate of your assessment of suitable brownfield sites, underutilised land, potentially increased density standards or other spatial options within your existing district or within the area of the new unitary authority of which you will soon be part of.

Your letter explains that Purbeck District Council consulted on three options for its spatial distribution of growth. These options (A, B and C) were set out in the New Homes for Purbeck document published earlier this year. You state that the "consultation results showed a clear preference" for the strategy which would necessitate the release areas of Green Belt land – this appears to be Option A. However, your consultation document states that the Council considers all options, A, B and C to be "realistic and deliverable". Apart from the fact that the consultation responses favoured Option A, no evidence or explanation as to why, in planning terms, the other two spatial options have now been ruled out has been presented in support of your request.

I would anticipate that once the new Dorset authority is in place there will be a need to review the strategic approach to delivering the overall housing need for the new unitary authority. Once you have fully assessed all the options within the new unitary authority area, if you are then still unable to accommodate the housing need, please

do contact me again and South Somerset District Council will consider any such request in the context of the evidence provided and the Duty to Co-operate.

For your information South Somerset District Council is in the process of reviewing its own adopted Local Plan 2006-2028 and carried out Regulation 18 consultation on Issues and Options from late 2017 to early 2018. The Local Plan Review is anticipated to be adopted in 2020.

Yours sincerely,

Jo

Jo Wilkins

Specialist – Strategic Planning

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Policy Planner

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1 August 2018

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Direct dial: 01305 252303
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Dear Steve,

Purbeck Local Plan

Thank you for your letter of 17 July to Matt Prosser, Chief Executive, who has asked me to respond on his behalf.

The next consultation stage on the review of the joint West Dorset, Weymouth & Portland Local Plan is about to take place, between 13 August and 8 October this year. This consultation will take place on a 'Preferred Options' document which sets out the sites suggested for meeting the councils' joint housing target.

The consultation document has identified a target of providing a deliverable supply of housing land in West Dorset, Weymouth and Portland of 15,880 dwellings between 2016 and 2036. The supply currently identified in the consultation document is 19,016, which exceeds the target. However, this is subject to the forthcoming consultation process and may be reduced: it has also been identified in order to provide a greater range of choice and competition in the local housing market in this area. At this stage therefore we would not be able to commit to the likelihood of some of this housing supply being available to meet the needs of adjoining areas.

You will be aware that this council supported 'Option A' in the previous consultation on the Purbeck Local Plan, on the grounds that this strategy was more likely to meet needs and to be deliverable, due to its inclusion of a wider range of potential development sites across Purbeck, and that we are continuing to work together in relation to the implementation of development in the Crossways and Moreton area.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hilary A. Jordan'.

Hilary Jordan
Corporate Manager, Planning (Community & Policy Development)