

Dorset Council

Purbeck Local Plan (2018-2034)

Response to Inspector's Matters, Issues and Questions

Matter H: Infrastructure

7 June 2019

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Matter H

Issue 1: Developer contributions (Policy I1)

Question 1

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. Yes. There is evidence to demonstrate that the plan's requirements, together with national standards, would not threaten the viability of development or put the implementation of the plan at risk and this is justified. A series of viability appraisals have been undertaken during the development of the plan.
2. A full appraisal was carried out to support the Options consultation and Preliminary Draft CIL Charging Schedule in 2016 which included national standards and local policies. The Purbeck District Partial Review of Purbeck Local Plan Part 1 and revised Community Infrastructure Levy Economic Viability Assessment report sets out the methodology and findings [SD31].
3. The appendices of The Purbeck District Partial Review of Purbeck Local Plan Part 1 and revised Community Infrastructure Levy Economic Viability Assessment [SD32] set out:
 - I The development appraisal assumptions;
 - IIa Residential Results Summary and Example Appraisal Summaries;
 - IIb Commercial Results Summary and Examples Appraisal Summaries;
 - III Market and Values Research, followed by EGi reporting extract and set out the results of the residential testing; and
 - IV Glossary of Terms
4. In 2017 a Viability Update and Sensitivity Testing [SD33] was commissioned to consider any changes in the market and the impact of self build homes and a requirement for some of the affordable homes to be social rented.
5. The appendices to the update [SD34] set out:
 - Appendix I - Development Appraisal Assumptions
 - Appendix II- Results of sensitivity testing
 - Appendix III- Values and other updated information review
6. In October 2018 the Council published a further update [SD35-SD37] building on the original study from 2016 and the sensitivity Addendum in 2017, to inform the Purbeck

Local Plan Pre-Submission Draft in accordance with the National Planning Policy Framework 2019 (NPPF).

7. In terms of viability context, the NPPG was also updated and supplemented in 2018. The previously established principles and good practice were addressed through the earlier work, and consistent also with the new guidance, have continued to be reflected appropriately.
8. At an appropriate level, (equivalent to that supported through other recent Local Plan examinations), the viability assessment work has considered representative development typologies and the larger sites which are proposed for allocation including looking at the sensitivity of the residual land value outcomes to variations in market values and other influences.
9. The viability assessment work shows that, by and large, the policies, with some adjustments, are capable of informing and supporting a suitable balance between the commercial drivers of development, development quality and the residents' and wider community needs, (through a re-set CIL charging schedule and the use of Section 106). It is considered that the policies will not unduly affect the ability of schemes to be developed viably, recognising also that as may prove necessary once more becomes known about actual scheme details and any abnormal costs etc., a practical approach can be applied where justified.
10. The main adjustments that the Council has adopted, compared to current policies, as set out in the Purbeck Local Plan Part 1, adopted in 2012 include:
11. Removal of a 50% affordable housing policy in the south of the district (and some green field sites in the north), leaving a maximum 40% affordable housing on sites of 10 or more on green field land.
12. A reduced proportion of affordable housing from sites on previously developed land of 30% across the district.
13. A 20% equivalent financial contribution from sites below 10 dwellings in designated rural areas, in accordance with para 63 of the NPPF. The current PLP1 plan policy adopted in 2012 of 40% or 50% from sites of two or more was subsequently superseded by national policy which restricted affordable housing requirements to sites of 10 or more dwellings, except in certain circumstances.
14. CIL levels have been reviewed and re-set to take account of an updated view of collective development costs and infrastructure requirements for the Plan relevant different types, sizes and locations of development. The largest sites of 200 or more dwellings are proposed to be zero rated for CIL to allow for additional infrastructure requirements on such sites; allocated sites which are required to provide their own Habitats Regulations mitigation (heathland, nitrogen reduction in Poole Harbour and, in limited areas, Poole Harbour recreation) have a reduced rate; all other residential sites have the standard tariff. In most areas the standard tariff is proposed to be set back at original 2014 rates (before any annual indexing was applied), i.e. £180 psm in Swanage and the Coast and £100 psm in Wareham and Purbeck Rural Fringe, with the exception being Upton and Purbeck Rural Centre where the viability assessment work supports a

common, single rate of £50 psm. In 2014 Upton and Purbeck Rural Centre housing sub market areas were split into two separate tariffs of £10 psm and £30 psm respectively.

15. The recent viability update includes CIL charges at these re-set rates, amongst the overall costs of development allowed for.
16. Where it was possible to place a locally relevant assumption on the known or currently estimated cost of a policy / required infrastructure, this has been included. Where settled estimates of costs were not available, which is not unusual at the plan-making stage, e.g. in respect of transport infrastructure requirements, assumptions were made from experience as far as possible.
17. The Viability appraisal raised concerns over the potential impact of a new education contribution on unallocated sites of 10 or more. This has been addressed in Policy I1 by affording applicants the opportunity to submit a financial viability appraisal as part of their planning application if they consider that site specific considerations militate against the provision of contributions sought as outlined in the policy.
18. The most recent assessment work, [SD35] Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy, undertaken again as a part of the Council aiming to keep its evidence relevant and updated as far as reasonably possible, includes consideration of allocated sites. A range of scenarios were tested, including variation in market profit levels and inclusion of 20% sheltered housing. The appraisals also included an increase in build costs of 10%. Appendix IIa sets out two sets of Residual Land Values (RLVs) and Existing Use Values (RLVs) figures for the allocated sites to indicate point of appraisal (2018) figures (Table 3a) and results assuming a 10% increase in sales values (Table 3b).
19. Tables 3a and 3b set out residual land values, EUV and uplift from EUV for both the lower value scenario and an improved market value scenario. Using the lower values the results for most of the sites are around or above the assumed key benchmark land value of £250,000 per ha for greenfield land, representing very significant uplift levels from EUV of between 857% and 3435%. An exception to this is Moreton Station/Redbridge Pit where the uplift from EUV is between 455% and 642%.
20. When the higher values are applied then all sites support a land value of more than £250,000/ha (with the RLVs representing an uplift on EUV ranging from 972% to 4960%).
21. Based on current knowledge and assumptions, Moreton Station/Redbridge Pit (Ref. H4) presents the most challenging viability at the lower values assumptions, mainly due to site infrastructure and other aspects, the costs of which are as yet not confirmed, which is to be expected in the circumstances. This site is an active quarry coming towards the end of its life. It is in the housing delivery trajectory for year 6 onwards and its overall viability may benefit from an increase in market values over the first few years of the plan. The Council considers this site to be developable and will continue to work with the Moreton Estate on the deliverability of the site as part of the new Dorset-wide local plan.
22. A number of respondents to the Regulation 22 consultation have raised concerns over the viability assessments, around the assumptions, costings used and their ability to

provide 40% affordable housing. The consultants who prepared the Viability Study have extensive experience in carrying out local plan and CIL viability assessments as well as planning application stage viability work, and both they and the Council are confident that an appropriate methodology and assumptions have been used, consistent with other studies supported through examination, and that developments will be able to come forward viably as a key element overall of the plan being deliverable.

Question 2

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?

23. The Council believes that policy I1 is justified, effective and consistent with national policy in its provisions for ensuring that the infrastructure necessary to support development will be secured without undermining the deliverability of the plan.
24. The policy has been prepared in consultation with relevant Council departments, other local authorities and infrastructure providers. The contributors to the plan are listed in appendix 1 of the IDP.
25. Affordable housing is not regarded as infrastructure, and as such, cannot be funded through CIL, so must be secured through Section 106 agreements. The mix set out in Policy H11 is informed by the SHMA, the NPPF's requirement for 10% of homes on major sites to be available for home ownership and a local requirement for 10% of affordable housing to be social rented as a result of the high affordability ratio. Further information is set out in answer to Matter E, Issue 4, Question 7.
26. The HRA identifies that all housing development in the plan area requires mitigation measures, without which no development could proceed. The allocated sites are of sufficient scale to have significant impact independently and, therefore, required to provide stand-alone mitigation for heathland and nitrogen reduction.
27. Since the Purbeck Plan was submitted for examination a draft Recreation in Poole Harbour Supplementary Planning Document (SPD) has been consulted on. The SPD covers development within a restricted zone which will have a visitor impact on the harbour. The mitigation identified within the SPD cannot be provided on a site specific basis and requires joint working across all development. Therefore, it will be necessary to fund through CIL receipts. This could be reflected through a modification (MM25) in clause b of Policy I1:
 - b. on allocated sites compliance with policy requirements to address Habitats Regulations related to heathland mitigation and nitrogen reduction in Poole Harbour will be secured through Section 106 payments ~~from allocated sites~~. Habitat Regulations requirements in relation to the recreational impacts on Poole Harbour and small sites will be funded ~~contribute to mitigation~~ through ~~the payment of~~ CIL.
28. The need for increased GP surgery capacity was highlighted by NHS colleagues in the local Clinical Commissioning Groups engaged directly in the development of the IDP

and through local plan consultations. Particular concerns were raised about the surgery capacity at Crossways which would serve Moreton Station/Redbridge Pit. The Crossways requirement has begun to be addressed through the current West Dorset, Weymouth and Portland Local Plan. Capacity concerns have also been raised for the surgeries serving Lytchett Matravers and Upton. The Wareham surgery is part of the Wareham Health Hub project. The contribution is based on costs of providing premises, and their calculation for new GP space is set out in appendix 2 of the IDP.

29. The contribution to recreation, sport and open space (Policy I4) is consistent with paragraphs 96 and 97 of the NPPF. The Council worked with other rural districts and Active Dorset to produce a Built Sports Facilities Assessment in 2017. Following local government reorganisation all the rural councils, except for Christchurch Borough Council, are now part of Dorset Council. Whilst working with the other rural authorities a specific assessment for Purbeck was produced [SD30]. Dorset Council is expecting to publish a Sports Pitch Strategy in the summer of 2019 identifying any short falls in provision, which includes a toolkit for identifying requirements from development sites. In the absence of a recent play strategy, the Council is using the Fields in Trust standards as a guide. The CIL levels are proposed to be zero rated or significantly reduced to enable allocated sites to provide the obligation.
30. Local transport projects are informed by a range of transport modelling studies which indicated that there would be an impact on the transport network but it would not be severe. The Transport Background Paper, January 2018 summarises the local studies. To mitigate the impact officers have worked with colleagues to develop local projects, as set out in the IDP.
31. Non-site specific transport projects will be funded through CIL.
32. The NPPF paragraph 94 places great emphasis on the provision of sufficient school places. Officers have worked closely with colleagues from the Education department to develop an approach to providing additional school places. The provision of new premises on the larger allocations was considered but a preference for a contribution to allow expansion of existing schools was expressed, as set out in the IDP. The Council has also applied the same principle to major developments of 10 or more dwellings. Appendix 3 of the Infrastructure Development Plan (IDP) sets out the calculation for education contributions. It is only applied to family orientated dwellings, i.e. at least two bedrooms and does not apply to accommodation for older people.
33. All the obligations have been tested through viability appraisals. To ensure that the combination of obligations doesn't undermine the deliverability of the plan applicants may provide viability evidence with their application.

Question 3

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?

34. The Council believes that there is clarity around what is secured through Section 106 agreements and CIL.
35. Sites allocated in the plan, i.e. Wool, Upton, Lytchett Matravers and Moreton Station / Redbridge Pit will provide local transport, health, and open space/recreation improvements (Policy I1c) and meet habitat regulations requirements as set out in the proposed modification to Policy I1b through Section 106 agreements.
36. Not all allocated sites are served by GP surgeries at capacity and Wool, for example, will not be expected to provide a contribution to GP services. As stated in I1c details are set out in the site policies.
37. Smaller allocated sites are subject to a reduced rate of CIL as the infrastructure burden is not as great as with larger sites over 200 dwellings. The CIL collected will not be spent on SANG provision or nitrogen reduction measures. It will be spent on other strategic issues such as Strategic Access Management and Monitoring or the Swanage railway connection.
38. Education contributions will also be secured through Section 106 agreements on sites of 10 or more dwellings (Policy I1e).
39. All affordable housing is secured through Section 106 agreements (I1a).
40. The relatively modest estimated future receipts from CIL will be used to provide habitat regulations mitigation for non-allocated sites (Policy I1b), Strategic Access, Management and Monitoring and strategic transport projects (Policy I1d).
41. All expenditure will be collected and spent in accordance with regulations on S106 contributions and CIL funds. Expenditure of Section 106 funds and CIL is published annually as part of the Authority Monitoring Report.

Question 4

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

42. The small sites referred to in part b include any sites that are not subject to a specific allocation, and any that are not subject to provision of a site specific SANG or nitrogen mitigation as set out in the SPDs. The Dorset Heathlands Planning Framework 2015-2020 SPD identifies the threshold of SANG delivery as around 50 but this is flexible to discourage under deliverability to avoid the planning obligation and take account of location.
43. The Council considers that this matter could be clarified by the addition of a foot note to Policy I1 to state the following (MM26):

'Small sites referred to under part b of the policy include any sites which do not provide site specific SANG or nitrogen mitigation through a S106 agreement. This excludes all allocated sites in the Local Plan, and also excludes any sites which may come forward for around 50 homes, and hence would need to provide an on-site SANG in line with paragraph 5.5 of the Dorset Heathlands Planning Framework 2015-2020.'

Issue 2: Improving accessibility and transport (Policy I2)

Question 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?

44. Yes, policy I2 is justified, effective and consistent with national policy.
45. Policy I2 is based upon an updated policy IAT from PLP1 which was consulted on as part of the options consultation in 2016, taking account of the NPPF.
46. A number of transport modelling studies were commissioned through the development of the plan, which concluded that whilst there would be impact on the road network, it would not be severe.
47. The Transport Background Paper, January 2019 [SD29] summarises the local studies. Studies on the strategic road network were published alongside the transport background paper as support for the additional consultation focussing on housing matters in early 2018. The modelling was carried out using a higher housing number of 3,195 for the plan period and considered 3 different options: focussing housing in the west of the plan area, focussing housing in the east or spreading development across the District. The final housing number planned for is 2,688¹, with a development strategy combining a number of larger sites, mainly in the west of the plan area with about a third in small sites spread across the plan area. As the modelling results didn't show a severe impact for the higher number, it follows that the lower number won't have a severe impact.
48. Policy I2 seeks to focus development in the most sustainable locations, maximising opportunities for accessing service and facilities by public transport, walking and cycling, as required by the NPPF to promote sustainable transport and mitigate additional traffic.
49. Input from transport providers and the former DCC Highways Department has been regularly sought through consultation at different stages of the local plan and specifically with the development of the IDP.
50. The Superfast Dorset project has funded rolling out infrastructure across rural Dorset to deliver significantly improved internet to residents and business. The Council acknowledges that technology may move on and the market may dictate even higher speeds be delivered.
51. The addition of the requirement around electric vehicle charging points is a reflection of the national emphasis on the move towards electric and low emission vehicles (NPPF paragraph 110 (e) and contributes towards NPPF 8 (c)), the environmental objective of

¹ This figure excludes 382 homes which had planning permission as at 1 April 2019, and which are not included within the plan's overall housing number. If these existing commitments are included, a total of 3,070 homes are anticipated to be completed over the plan period, which is still lower than the number tested in the transport modelling.

sustainable development. The policies around provision of charging points have been kept flexible as the transport department of the newly formed Council has only recently taken the first steps towards developing a strategy. Cross department working will ensure electric charging points will be deliverable.

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

Question 1

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

52. Yes, the policy is robust and consistent with national policy. The NPPF identifies the requirement for local plans to provide safe and accessible green infrastructure as one way of supporting healthy lifestyles (paragraph 91 (c)). It also contributes to achieving sustainable development (NPPF paragraph 8 (b)). The NPPF requires local plans to provide social, recreational and cultural facilities – paragraph 92 (a) and identifies the value of open spaces for the health and well-being of communities (paragraph 96).
53. The former councils in South East Dorset (Bournemouth, Christchurch, East Dorset, Poole and Purbeck), in partnership with Natural England, the Environment Agency and the Forestry Commission, jointly prepared a green infrastructure strategy, Investing in Green Places (2011), for the area. The strategy sets out a vision to co-ordinate planning / investment in parks, open spaces, wildlife corridors, street trees and other green spaces.
54. The Council considers that policy I3 provides a clear framework for protecting and strengthening the green infrastructure network.

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

55. The Council believes the policy as submitted to be sound. Adding the specific criteria however would add further clarity to the policy and reflect the expectation set out in the supporting text of Purbeck Local Plan 2019 at paragraph 250:

...New development is expected to make positive contributions to green infrastructure in Purbeck, and where appropriate should incorporate replacement and additional planting of trees and hedgerows.

Question 2

(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?

56. Yes, the policy on recreation, sport and open space is justified, effective and consistent with national policy, as set out in paragraphs 96 and 97 of the NPPF.

57. The Council worked with other rural districts and Active Dorset to produce a Built Sports Facilities Assessment in 2017. Following local government reorganisation all the rural councils, except for Christchurch Borough Council, are now part of Dorset Council. Whilst working with the other rural authorities a specific assessment for Purbeck was produced [SD30]. Dorset Council is expecting to publish a Sports Pitch Strategy in the summer of 2019 identifying any short falls in provision, which includes a toolkit for identifying requirements from development sites.
58. In the absence of a recent play strategy, the Council is using the Fields in Trust standards as a guide.
59. Significant amounts of natural open space will be made more accessible through policy E8 Dorset heathlands and the provision of Suitable Alternative Natural Greenspace.

(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?

60. The Council considers the plan to be sound as submitted but the proposed amendments (MM16 and MM17) would make it clear that the multi functionality of green space will be taken into account, e.g. the Fields in Trust requirement for natural open space may be provided through appropriate design of a SANG, through negotiation at application stage.
61. Since preparing the Schedule of possible modifications [SD14], the Council has noticed that the proposed modifications MM16 (the supporting text) and MM17 (Policy I4) are not consistent. A further modification could be made to align the supporting text and policy.
62. The supporting text at paragraph 253 could be altered as follows (additional proposed revision shown in blue):

‘The Purbeck Built Sports Facilities Assessment (2017) showed that Purbeck has adequate but out-dated sports facilities; the Council will work in partnership with facility owners to identify opportunities to enhance and improve existing provision.

A rural Dorset wide playing pitch strategy is also in preparation and will be completed by July 2019. The playing pitch strategy will consider the quality and quantity of the current facilities and identify where there is a current shortfall in provision. The requirement for local play and other open space facilities will be considered on a site by site basis. Where there is an identified shortfall, and having regard to the multi-functionality of open/green space, developments will be expected to ~~meet~~ follow the Fields in Trust standards currently set out within guidance for outdoor sport and play beyond the six acre standard, October 2015.

63. The Council accepts that the document referred to in the proposed modification does not have the form or content of a development plan document and therefore cannot be accorded development plan status (as prescribed in Parts 4 and 5 of The Town and Country Planning (Local Planning) (England) Regulations 2012). It is the Council’s view

that the reference in MM17 to ‘following Fields in Trust benchmark guidelines’ allows flexibility as to the interpretation of the guidelines, and does not imply that the guidelines would have development plan status. The Council considers that this reference aids and guides the interpretation of the policy.

Question 3

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

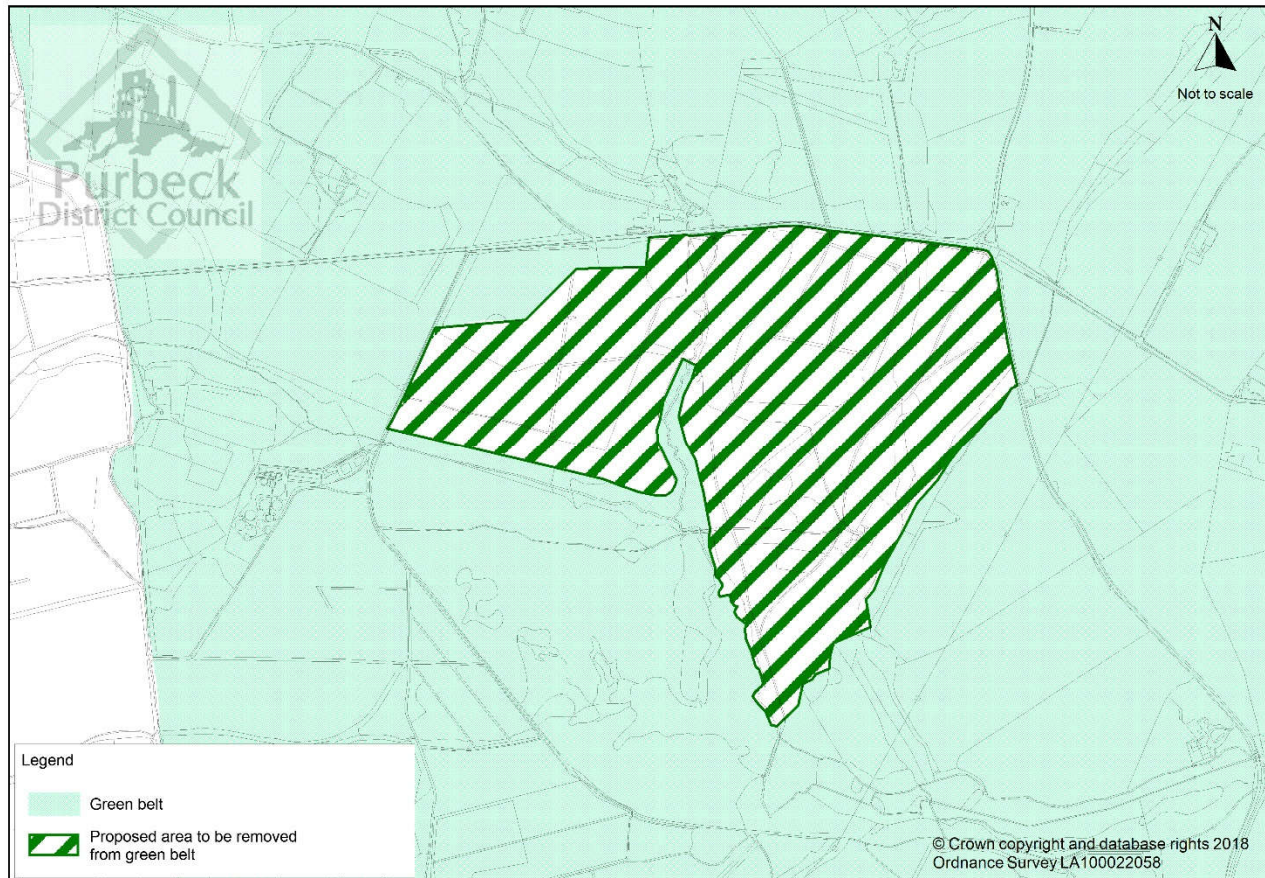
64. Yes, the Council believes policy I5 is justified, effective and consistent with national policy.
65. The HRA to support Purbeck Local Plan Part 1(PLP1)² identifies that a SANG is required in the north of the plan area district to mitigate development in the area between Bere Regis and Lytchett Matravers (paragraph 5.52). More recent visitor survey data from Sherfield Bridge carried out as part of the Wild Purbeck project confirms that most of the visitors to the area which includes Morden Bog and Hyde Heath SSSI (part of Dorset Heathlands Ramsar, Dorset Heathlands SPA Dorset Heaths (Purbeck & Wareham) & Studland SAC Dorset Heaths and SAC Poole Harbour Ramsar), are from the north of the site, mainly along the A35 corridor. Whilst allocated sites in this area are required to provide their own site specific mitigation, the impact of smaller sites and windfall needs to be addressed.
66. The full justification for the release of green belt through exceptional circumstances for a holiday park at Morden Park corner is set out in SD56, the Green Belt Study 2018 – Pre-submission. The exceptional circumstances for Green Belt release can be summarised as follows:
- The site will deliver a strategic SANG to mitigate the effects of new homes on protected heathland in the north of the district. The creation of a SANG in this location would serve a significant strategic function in supporting the delivery of existing and future windfall development. Supporting development in existing towns and villages, and on previously developed land in these locations, is consistent with the effective use of land.
 - The effects of the holiday park can be partially offset through compensatory improvements, as the SANG will increase public accessibility into this part of the Green Belt.
67. The SANG will serve in limiting / avoiding the adverse impacts from new homes on protected heathland in the northern part of the District. The Council has asked the landowner to consider whether there are any other alternative sites for the holiday homes on land in their ownership which is also outside the green belt. The land owner does not consider that there are any other alternative sites which are suitable for this development on their land outside the green belt. Together with the SANG the landowner will also be required to restore important heathland and woodland habitat as set out in Memorandum of Understanding for Morden SANG and holiday park. The

² Habitats Regulations Assessment of the Purbeck Core Strategy (September 2011), can be accessed via: www.dorsetcouncil.gov.uk/purbeck-local-plan-consultations

Council has taken these considerations into account when assessing the suitability of development at this site. The SANG and areas of the park to be used for informal recreation have not been identified for release from green belt as these uses conform with paragraph 146 (e) of NPPF as being not inappropriate forms of development in the green belt.

(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?

68. The Council believes that original policy I5 is sound.
69. The possible changes (MM18, MM19 and MM20) were drawn up when concerns were raised at the Regulation 19 consultation by the agent for the landowner about the certainty of delivery of a SANG by the holiday park proposal, and suggestions of other exceptional circumstances supporting green belt release, which the Council does not agree with.
70. Additional work has since been carried out by the landowner and their agent which has clarified the potential delivery of the SANG. The Council is now content that in principle the SANG can be delivered (see the Memorandum of Understanding between the Council, Natural England, Charborough Estate and Pro-vision), and proposes amending the policies map to identify green belt release following the policies map published alongside the Pre-submission consultation (see map below).



Map 1 identifying proposed green belt release

Question 4

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

71. Yes, the allocation of a site for an integrated health and social care hub is justified and effective. The NPPF expects local plan policies to support the delivery of local strategies to improve health (paragraph 92 (b)).
72. A number of studies and reviews have informed the project to develop an integrated health and social care hub.
73. The Purbeck Locality Commissioning Group carried out a consultation called Making Purbeck Fit for the Future which looked at how people in Purbeck could get the best possible health and social care in the future. This informed the Purbeck Healthcare Review and subsequent Clinical Services Review by the Dorset CCG, which concluded that one of the elements of future health care should be a hub.
74. In addition the Dorset Health and Wellbeing Board's Dorset Health and Wellbeing Strategy 2016-2019 identifies working better together as one of its' main priorities.

75. The Adult and Communities Directorate has produced a ten-year needs assessment to inform asset development across Dorset. The hub is seen as a key asset to help meet the social care needs in Purbeck.

Question 5

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?

76. The gist of Policy I7 has been carried forward from Purbeck Local Plan Part 1 with mainly minor updates for clarity. Under NPPF paragraph 92 (c) local policies should guard against the loss of facilities and services. The policy was consulted on as part of the Options consultation in 2016.
77. The policy contributes to overall sustainability by encouraging the retention of services and facilities for communities, a key objective in the NPPF – paragraph 8 (b) which promotes accessible services and open spaces. It also contributes to objective 8 (c) by minimising the need for travel and thereby contributing to moving to a low carbon economy.
78. The policy includes a new section on when development would be expected to provide new facilities, with reference to the IDP and site policies in the plan.
79. The Council believes the plan to be sound but minor amendments would allow for the possibility of providing new community facilities remote from a settlement where that is considered to be appropriate.
80. The updates to the PLP1 policy were consulted on at the options stage, including removing the marketing requirement where the proposed loss is proven to be part of a reorganisation programme to ensure the continued local delivery of public services or infrastructure. The Council has noticed a drafting error, in that this part of the policy was not included in the Submission Draft Local Plan [SD01a]. Therefore, the Council suggests a further possible change to policy I7, as set out below. Possible additional modification (MM27) is added in blue:

Policy I7: Community facilities and services

New community facilities and services will be encouraged to locate within a defined settlement boundary. 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 where appropriate located close to a settlement in an accessible location; and
 - iii. its impact on landscape, environment and local character is minimised

New development and provision of community facilities and services

New development should demonstrate that it can be adequately served by community facilities and services. Where shortfalls in the capacity of existing community facilities and services are identified, appropriate developer contributions will be sought to ensure adequate funding is available to accommodate the impacts of the development.

Where a development would generate its own pressures that would require the delivery of specific supporting community facilities and services, the Council will expect such facilities and services to be delivered on-site or close by. Alternatively, where an applicant can provide robust justification, the Council will, in the first instance, seek to secure off-site provision of the equivalent value of on-site provision and where this is demonstrated to be undeliverable, the payment of a commuted sum to the equivalent amount of on-site provision.

These requirements are set out in the sites policies and IDP.

Replacement facilities and services

Development (including change of use) that would replace an existing community facility/service with a new community facility or service will only be permitted if:

- b. the replacement is equivalent to, or an improvement on, what will be replaced;
- c. it replaces a facility(ies) or service(s) that has been proven to be no longer needed, suitable or viable; and
- d. it would provide an alternative community facility(ies) or service(s) that would support a demonstrable local need

Where the existing site is unsuitable for the current use and requires relocation, the new site must meet the criteria listed above for new facilities and services.

Safeguarding existing facilities and services

Development (including change of use) that would result in the loss of existing community facilities/services will only be permitted if:

- e. the applicant demonstrates that the current community facility/service has been sufficiently and realistically marketed without success for a continuous period of at least 9 months within the 12 month period prior to submitting the planning application; and
- f. the planning application is supported by a viability assessment, which shows that the current use is no longer viable. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

Where the proposed loss of a community facility or service is proven to be part of a reorganisation programme to ensure the continued local delivery of public services and related infrastructure, no marketing will be required.