

Purbeck Local Plan Review 2019

Matter D: The Strategy for Development Further Representations Thursday 4 July 2.00pm

	Consultee ID	Name/Organisation
1	1190589	Wyatt Homes (Deans Drove, Lytchett Matravers)
2	1191253	Gatesby Estates Ltd
3	1188470	Moreton Parish Council
4	1188067	Welbeck Land
5	1189887	Ms Clare Lees
6	1190247	Bloor Homes Southern
7	1191125	Bellway Homes Ltd & A F Baggs
8	1190693	Lulworth Estate, Redwood Partnership, Mr A Jackson
9	1188328	Wareham Town Council Neighbourhood Plan Steering Group
10	1191219	Westcoast Purbeck Ltd

**Purbeck Local Plan (2018 to 2034) Examination
Response to Inspector's Matters, Issues and Questions**

Matter D: The Strategy for Development

Q1 - Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- *The identification and assessment of reasonable alternatives; and*
- *The overall scale and distribution of development?*

While supportive of the spatial strategy in principle should it be concluded during the Examination process that additional allocations or reserve sites are required, land at Deans Drove, Lytchett Matravers, which as set out within our representations on the Submission Plan does not contribute positively towards the purposes of the Green Belt and is suitable, available and deliverable. The sites inclusion would contribute towards ensuring that sufficient flexibility is incorporated into the plan to respond to changes and meet future housing requirements.

As set out within the SHLAA assessment and subsequent Memorandum of Understanding with the council, we (Wyatt Homes) have identified land for Suitable Alternative Natural Greenspace (SANG) in Lytchett Matravers which would include sufficient capacity to address the effect of additional dwellings on this site and associated requirements with regard to mitigating the adverse effects on European sites in accordance with policy H3 (New housing development requirements).

EXAMINATION OF THE PURBECK LOCAL PLAN (2018-2034)

EXAMINATION STATEMENT ON BEHALF OF CATEBSY ESTATES PLC

Matter D – The Strategy for Development

Prepared by:

*David Neame BSc (Hons) MSc MRTPI
Director – Neame Sutton Limited*

June 2019

EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter D – Strategy for Development

05 June 2019

CONTENTS

<u>Section:</u>		<u>Page:</u>
1.0	Introduction	3
2.0	Matter D – Strategy for Development	3
	<i>Question 1 – Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:</i>	
	<ul style="list-style-type: none"><i>• The identification and assessment of reasonable alternatives; and,</i><i>• The overall scale and distribution of development?</i>	3
	<i>Question 2 – Is the scale, type and distribution of development set out in Policy V1 justified, effective and consistent with the overarching vision and spatial strategy of the Plan?</i>	3
	<i>Question 3 – Should Policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?</i>	4
	<i>Question 4 – Policy V1 indicates that the Local Plan allocates sites for housing to delivery the Council's vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?</i>	5
3.0	Changes Sought	5

EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter D – Strategy for Development

05 June 2019

1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of Catesby Estates Plc ("Catesby"), to those Questions raised by the Inspector (dated 10 May 2019), relating to the Strategy for Development in respect of the Purbeck Local Plan (2018-2034) ("the Plan") and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton on behalf of Catesby Estates Plc.
- 1.3 Catesby has a promotion site on Land East of Foxhills Road, Lychett Matravers, which has an indicative capacity of upto 130 no. dwellings.

2.0 Matter D – Strategy for Development

Question 1 – Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- *The identification and assessment of reasonable alternatives; and,*
- *The overall scale and distribution of development?*

Question 2 – Is the scale, type and distribution of development set out in Policy V1 justified, effective and consistent with the overarching vision and spatial strategy of the Plan?

- 2.1 Catesby's comments in relation to the questions raised by the Inspector under this matter should be read in conjunction with its Statements submitted in relation to Matters A, B and E and in particular the fact that the Council should be planning for a higher level of housing than the Plan currently seeks to accommodate.
- 2.2 Set in this context Catesby is of the view that the approach the Council has taken in the allocation of housing set out in Policy V1 is not reflective of the spatial strategy option it says it has pursued. In Paragraph 42 on Page 19 of the Plan the Council states that the spatial option it has pursued is one of dispersal of growth across the District, yet Policy V1 seeks to focus growth at Moreton and Wool, which would appear to reflect one of the previously rejected spatial strategy options.

- 2.3 Furthermore the Council identifies Lychett Matravers as a suitable and sustainable location for growth wherein releases from the Green Belt are considered to be justified in the context of the Framework 2019¹.
- 2.4 In the case of Lychett Matravers the Council has however only sought to allocate 150 dwellings, which is half the figure proposed for Wareham where Green Belt releases are also proposed.
- 2.5 Catesby considers that the settlement offers greater potential for accommodating housing beyond the level identified by the Council. A larger allocation of housing at Lychett Matravers would also help to balance the distribution of housing across the District in accordance with the preferred spatial distribution option that the Council says in Paragraph 42 of the Plan that it is intending to follow.
- 2.6 In this respect Catesby does not consider the distribution of housing set out in Policy V1 to be justified, effective or consistent with the overarching vision of the Plan and in particular relation to Lychett Matravers a redistribution is required.

Question 3 – Should Policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?

- 2.7 Catesby's view, as set out in its Matter E Statement, is that the Plan should not be reliant on as yet unallocated small sites and windfalls. Setting that aside for the purposes of this question Catesby considers that if a reliance is to be placed on smaller sites and windfalls their contribution to achieving the overarching vision for Purbeck does need to be properly explained in Policy V1. The problem the Council will have is that leaving such a high proportion of the local housing need for the District to unallocated sites means that it cannot control where that housing is delivered and therefore cannot state with any certainty that it will fulfil the objectives of the overarching vision. This demonstrates the flaw in the Council's approach by seeking to rely on such a high proportion (35%) of supply from unidentified sources.

¹ See Paragraph 43 on Page 19 of the Plan

Question 4 – Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council's vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?

2.8 As set out in Catesby's Matter B Statement the Council has not complied with the Framework 2019 in relation to Neighbourhood Plan sites. This is of particular importance in the context of Policy V1 where some 300 dwellings are proposed, via a Neighbourhood Plan, in Wareham. This equates to over 11% of the total minimum local housing need for the District and places the Council's housing delivery strategy at significant risk.

3.0 Changes Sought

3.1 The following changes are required in order for the Plan to be found sound:

1. Redistribution of housing, particularly in relation to Lychett Matravers to better reflect the spatial distribution option that the Council states it is pursuing and also to reflect the sustainability credentials of that settlement; and,
 2. Less reliance on neighbourhood plan sites within the spatial distribution strategy.
-

Inspector's Matters, Issues and Questions (MIQs)

Matter D: The Strategy for development

Issue 1: Spatial Strategy

Q 1

- Q1. Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:
- the identification and assessment of reasonable alternatives; and
 - the overall scale and distribution of development?

Library document:

[SD06d-New homes for Purbeck consultation report 2018](#)
[SD54-Site Selection Background Paper Jan 2018 Consultation](#)
[SD21-Strategic housing market area assessment \(SHMA\)](#)
[SD21-Strategic housing market area assessment \(SHMA\)](#)
[SD20-Strategic housing market area assessment \(SHMA\)2018 update](#)
[SD19-Housing background paper](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Answer to question

2. No.
3. The Spatial Strategy of the Plan is not justified and effective with respect to the identification and assessment of reasonable alternatives because reasonable alternatives were not considered.

NPPF and the AONB and Green Belt

4. The Local Plan treats the AONB as being sacrosanct. Whilst the February 2019 NPPF has reinforced the limitations on development in the AONB it has not disbarred all development. Large scale development on the same AONB in West Dorset was accepted by the Inspector who examined the West Dorset Local Plan in 2014~1 (see my SHLAA response)
5. The fact that Purbeck's largest and most sustainable community Swanage (Swanage Local Plan page 19 paragraph 61), is in the AONB is a worthy reason for allocating housing in Swanage and the larger settlements in the AONB such as West Lulworth.
6. Similarly the NPPF does not consider the Green Belt as sacrosanct and there is a strong case for development on the Green Belt in Wareham and Lychett Matravers, both of which are a significant distance from Poole and the release of Green Belt around these settlements would not in any way contribute to urban sprawl from Poole

The 3 Options considered

7. The 3 options considered all focused the majority of housing in varying degrees of loading on Wool and Moreton Station. Option A put 79% of the allocated housing in Moreton Station and Wool, Options B and C put 100% of the allocated housing in Moreton Station and Wool. Under the selected Option with Moreton Station having the largest allocation of 490 homes, 41% of the total allocated houses have been nominated for Moreton Station/Redbridge Pit.
8. The Spatial Strategy of the Plan is not justified and effective with respect to the distribution of development because the distribution is totally illogical. Approximately 79% of people in Purbeck live to the east of the Worgret Bridge just outside the western end of Wareham. But 61% of housing is provided 5 and 10 miles west of the Worgret Bridge, with the largest allocation and the most affordable homes being at Moreton Station/Redbridge Pit, 10 miles west of the Worgret Bridge and accessed via roads which are partly single carriageway. The houses proposed for Moreton Station/Redbridge Pit would be over 20 miles from the Swanage, which is by far the largest and most self-contained community in Purbeck.

Moreton Station/Redbridge Pit

9. The housing allocation to Moreton Station/Redbridge Pit is effectively a housing allocation to Dorchester in West Dorset. The allocation would be about 5 miles from Dorchester but at least 10 miles from the Worgret Bridge and the area containing almost 80% of Purbeck's population.
10. The 196 affordable homes part of the 490 house allocation will effectively be lost to Purbeck and be taken up primarily by people from Dorchester and to a lesser extent Weymouth. These houses will in effect be lost to the people in Purbeck because quite simply they will be too far away.
11. The justification for the number of houses in the allocation for Moreton Station/Redbridge Pit appears to be simply that the area has no environmental or landscape constraints.
12. The *Purbeck Council Parish Housing Needs Survey Report*, dated July 2016, states on page 5 that:

1 households meet the District Council's criterion for rented affordable housing (1% of occupied households).
13. The allocation of 490 homes (with 196 affordable homes at 40%) is therefore not related in any way to housing need in Moreton Station/Redbridge Pit.
14. West Dorset Council has approved a planning application for 500 houses and has proposed the building of a further 614 houses in its August 2018 Preferred Options document, giving a total of 1114 houses of which approximately 446 houses will be affordable (40% of total).
15. Thus the total number of houses approved and planned for Crossways is 1604 (490+1114) of which 642 (196+446) will be affordable at 40% of the total.
16. Crossways currently has about 1100 houses and so the approved and planned housing equates to approximately $1\frac{1}{2}$ times the total number of houses in Crossways.

17. The housing allocation to Moreton Station/Redbridge Pit is thus not in any way related to housing need in Moreton or in Crossways.

Inspector's Matters, Issues and Questions (MIQs)

Matter D: The Strategy for development

Issue 1: Spatial Strategy

Q 2

Q2. Is the scale, type and distribution of development as set out in policy V1 (*Spatial strategy for sustainable communities*) justified, effective and consistent with the overarching vision and spatial strategy of the Plan?

Library document:

[SD06d-New homes for Purbeck consultation report 2018](#)

[SD54-Site Selection Background Paper Jan 2018 Consultation](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD20-Strategic housing market area assessment \(SHMA\)2018 update](#)

[SD19-Housing background paper](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Answer to question

2. No.
3. The vision states on page 18 that:

...development will be spread across the District. The majority of new homes will be in the less environmentally constrained areas including Wool and Moreton Station in the west of the District. To ensure a supply of housing across the District, new housing, employment, shops, services and community facilities, will continue to be supported in the towns (Swanage, Wareham and Upton) and key service villages....

4. Note that there is no recognition of the technologies that I referred to in my answer to Matter A, Issue 4 questions 2 and 3.
5. The Spatial Strategy for sustainable communities on page 20 of the Purbeck Local Plan Pre-Submission draft state in paragraph 41 that

The most favoured option from the results of the consultation was the one that sought to spread development as much as possible, including releasing some areas of the green belt for homes as well as providing homes in the less environmentally constrained west of the District. It also included the use of smaller sites geographically spread across the District subject to the criteria outlined in a small sites policy.

6. Policy V1 does not implement the Vision or the result of the consultation.

7. Development is overwhelmingly concentrated in Wool, Moreton Station with a much less significant development in Bere Regis. Wool and Moreton Station/Redbridge Pit are 5 and 10 miles west of the Worgret Bridge just outside the western end of Wareham. But approximately 80% of Purbeck's population lives east of the Worgret Bridge.
8. The 65 bed care homes in Moreton Station/Redbridge Pit and Wool will be 5 and 10 miles away from the locations where the overwhelmingly majority of Purbeck's elderly population currently live.
9. There is absolutely nothing in Moreton Station/Redbridge Pit for an elderly resident in the proposed 65 bed care home. Residents will be marooned in a location in which the only break in the isolation will be provided by the train horn once an hour as the train from London enters the station. Family and friends, shops and cafes will be many miles away.
10. Policy V1 does not allocate any development to Swanage which is 69 times larger than Moreton Station or to any of the communities in the AONB, many of which are larger than Moreton Station.
11. There is no employment in Moreton Station and very little in Crossways.
12. Policy V1 refers in paragraph 3 to:

Employment development will be directed to the strategic employment sites at Dorset Innovation Park and Holton Heath

13. The Innovation Park is intended for the following sectors:

Advanced engineering and manufacturing:

- *Defence*
- *Marine*
- *Energy*
- *Cyber Security*

14. These sectors are highly specialised and require people with MScs and deep experience. The 2011 Census indicates that there are extremely few people in Purbeck and West Dorset with higher level qualifications and expertise in these areas.
15. Holton Heath is about 23 miles to the east from Moreton Station/Redbridge Pit.
16. Thus the Pre-Submission pays lip service to the Vision on page 18 Spatial Strategy on page 20 but Policy V1 in effect puts the overwhelming majority of new homes many miles east of where they are required and the strategic Innovation Park is intended for very specialised sectors which require workers with highly specialised education, and expertise.
17. Thus Policy V1 in effect does the opposite of what the strategy statements require. Policy V1 concentrates housing in the west many miles from where it is required in the east, and emphasises employment in advanced engineering industries in the Innovation Park for which the 2011 Census indicates very few in Purbeck and West Dorset are equipped to undertake.

Inspector's Matters, Issues and Questions (MIQs)

Matter D: The Strategy for development

Issue 1: Spatial Strategy

Q3

Should policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?

Library document:

[SD06d-New homes for Purbeck consultation report 2018](#)

[SD54-Site Selection Background Paper Jan 2018 Consultation](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD20-Strategic housing market area assessment \(SHMA\)2018 update](#)

[SD19-Housing background paper](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Answer to question

2. Yes.
3. Policy V1 should refer to all the sites which will contribute toward the housing total which Purbeck Council says will meet their total housing target by 2034.
4. Without its inclusion the document fails to provide the complete list of how the housing total will be achieved
5. For example the Policy V1 does not include the Swanage Local Plan's 200 houses of which 150 (Purbeck Local Plan, page 50 paragraph 114 first ●) are considered to contribute towards meeting the housing total.
6. The Swanage Local Plan, however, contains a statement on page 11 in paragraph 22 which appears to contradict the inclusion of the 150 houses which the Purbeck Local Plan has included.
7. It is noteworthy that the Swanage Local Plan does not cover the period 2027 to 2034 and hence the Purbeck Local Plan could easily allocate 500~700 or so houses (at 100 houses built per year) in Swanage over the period 2027 to 2034.
8. From a spatial strategy perspective this would make far more sense than providing houses for Purbeck in Moreton Station/Redbridge Pit which is at least 10 miles from where over 80% of Purbeck's population currently live.

9. The Swanage Local Plan states on page 19 in paragraph 61 that:

Its location makes Swanage one of the most self-contained towns in Dorset.

10. It would, therefore, be remiss of Purbeck Council/Dorset Council not to build upon such a glowing description and in planning terms it would be eminently sensible to allocate as many houses as possible to be built in the town.

11. Swanage (5759 houses) is 69 times larger than Moreton Station (83 houses).

Inspector's Matters, Issues and Questions (MIQs)

Matter D: The Strategy for development

Issue 1: Spatial Strategy

Q4

Q4. *Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council's vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?*

Library document:

[SD06d-New homes for Purbeck consultation report 2018](#)

[SD54-Site Selection Background Paper Jan 2018 Consultation](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD20-Strategic housing market area assessment \(SHMA\)2018 update](#)

[SD19-Housing background paper](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Answer to question

2. No.
3. When the Purbeck Local Plan was submitted to the Secretary of State neither the Wareham nor the Bere Regis Neighbourhood Plans had been made and, therefore, neither was in force.
4. Neither plan is still not in force.
5. The Wareham Neighbourhood Plan depends upon the Purbeck Local Plan to be adopted to release land from the Green Belt for housing.
6. Thus if this part of the Purbeck Local Plan is not agreed then the Wareham Neighbourhood Plan cannot provide the 300 houses which are integral to Purbeck meeting its housing target.
7. Hence the Purbeck Local Plan depends on the Wareham Neighbourhood Plan which depends on the Purbeck Local Plan, which depends on the Wareham Neighbourhood Plan which depends on.....
8. This is plainly not a satisfactory way to plan.
9. Another fundamental fault with the way that the Purbeck Local Plan utilises the Neighbourhood Plans is that Purbeck have used the housing figures proposed by Bere Regis and Wareham, whereas the NPPF on page 10 in paragraph 29 states that:

Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies

10. Purbeck Council should have set out in their Local Plan the number of houses that they would like to see built in Bere Regis and Wareham and Bere Regis and Wareham should have used that figure in their Neighbourhood Plans.
11. But the reverse process has taken place.
12. The June to August 2016 consultation contained a proposal for 500 homes west of Wareham and 205 homes in North Wareham.
13. Thus the Council could have made an allocation of about 700 in total for Wareham with no need to take land from the Green Belt.
14. But instead they followed the lead of the Wareham Neighbourhood Group instead of proposing a strategic allocation.
15. This is not in accordance with the NPPF.
16. Purbeck Council's Issues and Options Consultation, January 2015, stated on page 30 for Bere Regis that *Developers believe land could accommodate a phased development of up to 1000 new homes...*
17. The Highways Agency raised objections to this number of houses leading to commuting on the strategic highway network. But they did say in their correspondence that they would be happier for housing to be allocated to Bere Regis if employment was also included in the development. Thus Purbeck Council could have allocated a larger number of houses to Bere Regis than 105 house, but instead took the lead from the Bere Regis Neighbourhood and only allocated 105 houses.
18. This is not in accordance with the NPPF

Inspector's Matters, Issues and Questions (MIQs)

Matter D: The Strategy for development

Issue 1: Spatial Strategy

Q5

Q5. *How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?*

Library document:

[SD06d-New homes for Purbeck consultation report 2018](#)

[SD54-Site Selection Background Paper Jan 2018 Consultation](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD21-Strategic housing market area assessment \(SHMA\)](#)

[SD20-Strategic housing market area assessment \(SHMA\)2018 update](#)

[SD19-Housing background paper](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Spatial Strategy, Rural Functionality Study. SHLAA

Answer to question

2. The Wareham Neighbourhood Plan site requires the release of green belt land via the adoption of the Purbeck Local Plan, which relies on the housing allocation in the Neighbourhood Plan in Policy V1 to achieve the required housing total.
3. In other words the Purbeck Local Plan and the Wareham Neighbourhood Plan depend on each other.
4. This is not the way to produce Local Plan.

PURBECK LOCAL PLAN 2018 - 2034

EXAMINATION IN PUBLIC

RESPONSE TO MATTER D: THE STRATEGY FOR DEVELOPMENT

ON BEHALF OF WELBECK LAND

JUNE 2019



WELBECK LAND

Carter Jonas

CONTENTS PAGE	Page No
1.0 INTRODUCTION	1
2.0 INSPECTOR'S MATTER D: THE STRATEGY FOR DEVELOPMENT.....	2
Issue 1: Spatial Strategy.....	2
Q1.....	2
Q2.....	3
Q3.....	4
Q4.....	4
Q5.....	5
Q6.....	6

1.0 INTRODUCTION

- 1.1 This statement is submitted by Welbeck Land (“Welbeck”) in relation to the Examination in Public of the Purbeck Local Plan 2018 - 2034 (“the plan”). Carter Jonas LLP is instructed by Welbeck.
- 1.2 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate.
- 1.3 Welbeck has been supportive of the preparation of the plan and the overall principle direction of key elements of the plan. Welbeck supports the overall strategy and the intention of providing a stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 1.4 Welbeck has specific and important concerns that the plan and its reliance on the Wareham Neighbourhood Plan will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham’s size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 1.5 Representations were made detailing the views of Welbeck through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 1188067).
- 1.6 In this submission, Welbeck sets out its responses to Matter D: The Strategy for development
- Issue 1: Spatial Strategy
 - Questions: 1 to 6

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

2.0 INSPECTOR'S MATTER D: THE STRATEGY FOR DEVELOPMENT

Issue 1: Spatial Strategy

Q1. Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- **the identification and assessment of reasonable alternatives; and**
- **the overall scale and distribution of development?**

2.1 Welbeck does not believe that the spatial strategy is fully justified, effective or consistent with national policy. The principle concerns that Welbeck has, are:

- (a) the lack of fully tested alternative growth options for Wareham; and,
- (b) the devolution of strategic decisions to the Wareham Neighbourhood Plan.

2.2 Welbeck has had continued concerns, throughout the iterations of Local Plan consultation, about the sustainability appraisal (SA). The SA documents have been difficult to follow, and evolutions of the document have not always been available to review, and this despite cross reference between the volumes of the SA as it has been published. The regulation 19 version of the SA did not include the potential of Wareham as a strategic location for growth. There is a statement on page 21 of the SA report as follows:

“Different options with regards to settlements and spatial strategy were explored as part of the SA of the New Homes for Purbeck Consultation of January 2018.”

2.3 However, this January 2018 iteration of the SA was not available during the regulation 19 publication consultation. The result of that omission was to forestall any proper debate on the merits of this location in comparison with other identified sites for growth.

2.4 Review of sustainability appraisal documents that are now available as part of the examination reveals a reliance on site submissions to understand the ability of a location to accommodate growth, rather than a principle for that location. For example the April 2016 iteration of the SA includes the following settlement assessment:

Settlement: WAREHAM

Comprising the following site: • Land at Worgret Manor (SHLAA ref. 6/02/0170)

2.5 The opportunity for Wareham to be considered as a suitable location for strategic level growth appears to have been missed, and instead an assessment of a single available site has been taken to represent opportunities at the settlement. There are clearly other sites available – not least those promoted by Welbeck, but also others proposed for allocation by through the neighbourhood plan (NP) – but moreover, the strategic constraints for the settlement as a whole, the capacities of infrastructure and services and the *principle* for growth at Wareham is very difficult to find in the SA if it is there at all.

2.6 Regarding the overall scale and distribution of growth, Welbeck has found it difficult to understand how the council has reached its conclusions. For example, it is not clear how the figure of 1,700 new homes residual has been calculated from the

evidence base (The evidence document, Housing Background Paper, does not contain an obvious analysis leading to this figure). As this is the starting point for any spatial strategy. An additional modification to include a simple table at or around paragraph 40 of the plan would usefully clarify the calculations.

- 2.7 Furthermore, it is unclear how the figure of 300 (or 200) at Wareham has been derived. The 300 figure appears to have emerged from the drafting of the NP where the original – and assessed target in the HRA for example – is for only 200 homes. This situation is contrary to the NPPF and contrary to the necessary order of documents and their primacy. The NPPF is clear at paragraph 65 that:

“...strategic policies should also set out a housing requirement for designated neighbourhood areas...”

- 2.8 Notwithstanding this confusion in the Plan policies the principle for growth as set out in the vision is sound:

“The majority of new homes will be in the less environmentally constrained areas including Wool and Moreton Station in the west of the District. To ensure a supply of housing across the District, new housing, employment, shops, services and community facilities, will continue to be supported in the towns (Swanage, Wareham and Upton) and key service villages where growth will be proportionate to the size and character of the settlement. Limited developments that are sympathetic to their surroundings will also be supported elsewhere across the District...”

- 2.9 Wareham is a very sustainable location with a range of facilities and services, including a railway station and strong employment, and as such can support growth of 300 or more homes. This needs to be planned for positively and effectively. The strategic policies of the Local Plan can identify a figure *to be allocated* and the NP can look to edit Green Belt boundaries under the revised NPPF. The resultant NP should not be accepted and adopted as part of the development plan if it continues to propose allocations of active employment sites and leaves a third of its requirement to the luck of windfall development. The way that the Wareham NP is progressing and dictating undeliverable and ineffective terms to the local plan demonstrates how the local plan is unsound. The strategy is not positive, not effective, and does not conform to national policy.

Q2. Is the scale, type and distribution of development as set out in policy V1 (Spatial strategy for sustainable communities) justified, effective and consistent with the overarching vision and spatial strategy of the Plan?

- 2.10 Welbeck objects to policy V1, it is unsound on the grounds that the policy muddles *spatial strategy* with *allocations* and goes straight to the numbers, bypassing the usual analysis of the spatial advantages of particular locations. This renders the policy unjustified and potentially ineffective. In addition, the allocation of numbers to particular locations does not take proper account of the published evidence. In terms of environmental capacity, infrastructure capacity and in terms of measures which define sustainable locations this evidence shows that Wareham, and North Wareham in particular, is a strategic location on a par with, if not better than, Moreton Station, Wool, Lychett Matravers or Upton.
- 2.11 In order to correct Policy V1, the spatial strategy should provide a clear indication of which settlements are part of the strategy and there should be a clear strategic policy

either within Policy V1 or preferably as a separate policy (following proposed policy H2) that provides the strategic allocations at Wareham.

- 2.12 It is not appropriate for a significant strategic policy to depend upon neighbourhood plans to allocate strategic sites essential to the delivery of the Local Plan. Wareham is too important a town within Purbeck (its second largest) for such decisions to be abrogated. This is compounded by the fact that the current Wareham NP in progress is incapable of making such allocations as relied upon by this policy. The NP itself states that it cannot in law release land from the Green Belt and in consequence cannot allocate the land at North of Carey Road to deal with the housing requirement of the town. This situation is evolving, and of course, with strategic direction the NP can now make amendments to the Green Belt but that direction is first required from the Local Plan and this order in the primacy of plan is not currently engaged with by the local plan and NP.

Q3. Should policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?

- 2.13 Welbeck considers that this approach would be beneficial to the plan as a whole and its soundness.
- 2.14 Notwithstanding the above concerns about policy V1 not providing a clear strategy for growth and rather only providing for a scale of development, the role of small sites and windfall development should be made clear.
- 2.15 The NPPF is clear at paragraph 68 that:

“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.”

- 2.16 The NPPF goes on to explain how government expects the inclusion of such sites in the development plan – including in NP – and it is therefore reasonable to see this described in policy V1 of the local plan. This would give strategic guidance to NP groups and also provide context for policies H2 and H8 later in the plan.
- 2.17 The inclusion of windfall in the plan, of course, needs to have regard to the provisions of paragraph 70 of the NPPF:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply.”

Q4. Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council’s vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?

- 2.18 This approach is not consistent with national policy. It does not respect the order and primacy of elements of the development plan and the Local Plan should set the housing requirement for the NP not *vice versa*. The NPPF is clear at paragraph 65 that:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified

housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”

2.19 Furthermore, given the strategic nature of the scale of development at Wareham and its importance to the overall delivery of the plan strategy there is significant risk in devolving this responsibility to a plan that does not have to meet the test of soundness. Welbeck’s concerns in this respect appear to be borne out in considering the Wareham NP. The proposed NP is unlikely to deliver sufficient sites to provide for 300 new homes. Proposed site allocations include employment sites in current active use and a reliance on the chance of a significant amount (on third of the total requirement) of windfall development.

2.20 It is clear that for Purbeck to be able to achieve and deliver its vision and requirements is must give stronger direction to subsequent NP. This direction should include a clear target for housing site *allocation*, and potentially given the strategic importance of the towns in the area, at least some of that target should be included as allocated development sites in the Local Plan – additional allocations could be considered through each NP.

Q5. How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?

2.21 The proposal at Wareham, in the NP, is to allocate the land released from the Green Belt through policies V1 and V2 of the Local Plan for housing development (potentially 40 dwellings – although Welbeck has made representations that the site can accommodate more homes) and the delivery of a SANG.

2.22 Welbeck has significant concerns that this matter is confused, and both the local plan and the Wareham NP have been overtaken by the passage of time and revisions to national policy.

2.23 As is explained in the above submissions; the NPPF now provides for the strategic direction of a local plan to identify exceptional circumstances for the need to change Green Belt boundaries and that subsequent NP can define those changes. This was not the case, however, in the 2012 version of the NPPF. Under the previous framework, only local plans could review Green Belt boundaries and as such even if a community wanted to allocate a development site through a NP, if they were ‘washed over’ by, or tightly inset from, the Green Belt they could only seek very limited infill. Any potentially changes to Green Belt boundaries had to be proposed through the local plan.

2.24 The need to change the Green Belt at Wareham in the Purbeck Local Plan has stemmed from this situation. The NPPF 2012 was extant at the outset of both the Purbeck Local Plan and the Wareham NP. Indeed the NP was also submitted for examination under the transition period from NPPF 2012 to 2018. Consequently, the proposed policy in the NP is to review the plan and include a site allocation upon the adoption of the local plan that has released developable land from the Green Belt. This is an example of the lack of certainty in the NP and the unresolved conflict

between the primacy of the local plan and the NP as it is not clear which document is providing direction for which other.

- 2.25 Welbeck explains in response to the Inspector's 'Matter C' that there is greater capacity at Wareham for suitable Green Belt release and how this would provide for a positive and effective plan approach for both Purbeck and Wareham. Suffice to say, the NP relies on undeliverable sites and optimistic windfall assumptions. The Local Plan should indicate more clearly capacity for appropriate Green Belt release at Wareham and the need for the NP to allocate further land for removal from the designation to provide for more certain development.

Q6. Is the change to policy V1 (MM1) indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is effective?

- 2.26 Welbeck accepts the explanation for the proposed change as set out in the councils table of modifications. However, as the Inspector has cited at question 3, above, the role that small sites and windfalls play in the overall strategy should not be lost from the policy. Therefore some additional text to explain this matter should also be proposed by the council.

Post Green,
Lytchett Minster,
Poole,
BH16 6AP

Helen Nolan
Programme Officer
Purbeck Local Plan
Dorset Council
Westport House
Worgret Road
Wareham BH20 4PP

plp.programmeofficer@dorsetcouncil.gov.uk

May 20th, 2019.

Dear Ms Nolan

Lytchett Minster – Flood Risk Study

On 5 March 2019 I met with the Purbeck District Council planning policy team to highlight updated evidence on flood risk in Lytchett Minster that had been prepared by Dorset County Council and which Dorset County Council had presented at a meeting in November 2018. I undertook at the meeting to write to confirm the conversation held (see attached email of 6 March 2019).

I also attach subsequent related email correspondence from Steve Boyt of Purbeck District Council (now Dorset Council) dated 6 March 2019, 14 March 2019, 9 April 2019 and 16 May 2019.

On the basis of the content of the 16 May 2019 I wish to alert the Inspector to this overall matter, and trust that the Inspector will accordingly be notified by planning policy officers on the findings of the review of evidence as soon as possible.

I have always believed and continue to believe that Lytchett Minster was ruled out of the Strategic Plan Housing Allocation as a result of a campaign led by local group LYMPWatch alleging flooding which was then backed by 'the Jacobs report'. I firmly believe that Lytchett Minster, were it not for false rumours of flooding, would have provided a much better location for strategic housing development than any of the other sites now offered. In short, I believe correcting this evidence is critical and goes to the heart of the quality of the Strategic Plan placed before the Inspector.

Yours sincerely

Clare Lees

cc Steve Boyt Purbeck District Council

From: Clare Lees

Sent: 06 March 2019 13:36

To: Ken Bean <KenBean@purbeck-dc.gov.uk>

Cc: Steve Boyt <SteveBoyt@purbeck-dc.gov.uk>; Bridget Downton <BridgetDownton@purbeck-dc.gov.uk>; Oliver Chamberlain, Chichester; Max Thurgood, Clarke Bond; Andrew Elliott, Terence O'Rourke; Ron Hatchett, Bloor Homes>

Subject: Meeting yesterday with Ms Bellamy and Mr Bean.

Dear Mr Bean and Ms Bellamy,

Thank you for meeting with Max Thurgood, Director at Clarkebond, Oliver Chamberlain, land agent and me yesterday in your offices at Purbeck District Council. We asked for the meeting to bring to your attention a thorough and all encompassing study undertaken by Dorset County Council (as the Lead Local Flood Authority) and funded by the Environment Agency to investigate possible pluvial (surface water) flooding at Lytchett Minster (given that the EA has already concluded that there is no fluvial flooding present). This was a two year study and a report on the findings was presented to Max, Oliver and myself along with representatives from Lympwatch, the pressure group against development in Lytchett Minster, Bill Pipe, Purbeck District Councillor and Paul Johns, Flood Warden for Lytchett Minster and Upton Town Council, on the 23rd November, 2018. Sadly, despite a councillor from Purbeck District Council and the Flood Warden from Lytchett Minster and Upton Town Council being present at the presentation you appeared unaware of the findings of the study.

The submission documents to the Purbeck Local Plan Review contains an Environment Document, SD17 Strategic Flood Risk Assessment, which relies upon and references the Jacobs report entitled Lytchett Minster Flood Risk Study. This is a desk top study based on recorded evidence, and information supplied to them by some interested parties and by its own admission doesn't include any detailed modelling. In the light of the new and comprehensive surface water modelling study completed by DCC we believe it is incumbent upon you to withdraw the current conclusions in SD17 relating to Lytchett Minster and delete all reference to the Jacobs report. SD17 and the Jacobs report, in the light of the new DCC study, are both now inaccurate and misleading and SD17 requires updating to the latest evidence that is in the possession of DCC LLFA and public domain. You are under a duty not to knowingly present misleading information to the Inspector.

I look forward to hearing from you and hearing what action you propose to take to rectify this situation.

Yours sincerely,

Clare Lees.

From: Steve Boyt <SteveBoyt@purbeck-dc.gov.uk>
Subject: FW: Meeting yesterday with Ms Bellamy and Mr Bean.
Date: 6 March 2019 15:44:25 GMT
To: Clare Lees
Cc: Ken Bean

Dear Ms Lees

Thank you for your e-mail, Mr Bean has asked me to prepare a response in his behalf. I have arranged to meet with colleagues at Dorset County Council to discuss the issues relating to flood risk around Lytchett Minster raised in your e-mail and during the meeting you had with colleagues on the 5th March. I will respond to the matters raised in your e-mail relating to the Council's Strategic Flood Risk assessment after the meeting with Dorset County Council (this is likely to be toward the end of next week [ending Friday 15th March] or early in the following week [beginning Monday 18th March]). If you have any further queries in the meantime please don't hesitate to call me on 01929557385.

Yours sincerely

Steve Boyt

From: Steve Boyt <SteveBoyt@purbeck-dc.gov.uk>
Date: 14 March 2019 at 08:20:26 GMT
To: Clare Lees
Cc: Ken Bean
Subject: RE: Meeting yesterday with Ms Bellamy and Mr Bean.

Dear Ms Lees

My colleague and I met with officers at Dorset County Council yesterday to discuss flood risk around Lytchett Minster. I am expecting to receive some further information from the County Council – once I have received and analysed this information I will respond to the matters raised in your e-mail. I hope to complete my response next week, but I will keep you updated I anticipate a delay. If you have any questions relating to the issues that we have been discussing in the meantime please don't hesitate to give me a call on 01929557385.

Yours sincerely

Steve Boyt

On 9 Apr 2019, at 15:55, Steve Boyt <steve.boyt@dorsetcouncil.gov.uk> wrote:

Dear Ms Lees,

I writing to provide you with an update on my response to your query. My colleagues and I are working on undertaking a comparison between the flood risk modelling carried out by the Lead Local Flood Authority (LLFA) and that presented in the Council's strategic flood risk assessment (SFRA). I expect this work to be completed in early May. When the analysis is completed the Council will be able to decide whether the: i) SFRA needs to be updated, and ii) Inspector examining the Purbeck Local Plan needs to be updated with the emerging evidence relating to flood risk in advance of the oral hearings. If you have any questions relating to this e-mail please don't hesitate to give me a call on 01929557385.

Yours sincerely

Steve Boyt

Steve Boyt
Planning Policy Officer
Planning and Community Services

Dorset Council

01929557385
dorsetcouncil.gov.uk

From: Clare Lees
Sent: 15 May 2019 11:54
To: Steve Boyt <SteveBoyt@purbeck-dc.gov.uk>
Cc: Frances Summers <FrancesSummers@purbeck-dc.gov.uk>; Anna Lee <AnnaLee@purbeck-dc.gov.uk>; Oliver Chamberlain, Chichesters
Subject: Re: Purbeck Local Plan Review 2019

Dear Mr Boyt,

I am wondering whether you have any update having seen the flood risk modelling carried out by the LLFA. I hope you will agree with me that the inspector needs to be informed of a substantial change in the assessment of flood risk in Lytchett Minster. At present SD 17 is misleading.

With best wishes,

Clare Lees.

On 16 May 2019, at 15:29, Steve Boyt <steve.boyt@dorsetcouncil.gov.uk> wrote:

Dear Ms Lees,
I am very sorry for the delay in response. Unfortunately I have not yet been able to complete the analysis on flood risk around Lytchett Minster – I expect the work to be completed in the last week of May (if necessary this will allow the Council to update the Inspector on this matter in course of responding to the matters, issues and questions that she has raised).

If you have any further queries relating to this e-mail please don't hesitate to call me on 01929557385.

Yours sincerely

Steve Boyt
Planning Policy Officer
Planning and Community Services

Dorset Council

01929557385
dorsetcouncil.gov.uk

From: Clare Lees
Sent: 16 May 2019 16:08
To: Steve Boyt <SteveBoyt@purbeck-dc.gov.uk>
Cc: Anna Lee <AnnaLee@purbeck-dc.gov.uk>; Frances Summers
<FrancesSummers@purbeck-dc.gov.uk>
Subject: Re: Purbeck Local Plan Review 2019

Dear Mr Boyt,

Will the update you give to the Inspector be made public and if so, will there be time and opportunity for me to respond to your update? Please can you give me some timetable and idea of the opportunities I will have to respond to this important matter?

With best wishes,

Clare Lees.

On 17 May 2019, at 08:04, Steve Boyt <steve.boyt@dorsetcouncil.gov.uk> wrote:

Dear Ms Lees,

Thank you for your e-mail. The Council's response to the Planning Inspectors Matters, Issues and Questions will be published, along with all the other further statements submitted by representors. The Planning Inspector has prepared a guidance note for representors on the pre-submission draft Purbeck Local Plan on making further statements in support of their original representation (please follow this link to Council's website to access the document - <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/local-plan-review-purbeck.aspx> (presented under the heading 'Procedural correspondence'))).

I have extracted part of the guidance (paragraphs 18 – 21) below which relates to further statements based on Inspectors Matters, Issues and Questions:

'Any representor may submit a further statement in support of their original representation in advance of the Hearings. However, if a further statement is submitted it should address only the Matters, Issues and Questions that I have identified and should be limited to those questions directly related to the scope of the original representation. There is no need to re-state points already made but neither should wholly new arguments or important information, which ought to have been provided during the consultation, be put forward. A separate statement should be provided for each Matter addressed.

Oral and written representations carry equal weight, therefore there is no requirement to submit a further statement and you may rely on your original representation if you wish to do so.

All statements, whether electronic and/or in paper form, should be sent to the Programme Officer by 5pm on Friday 7 June 2019. No new evidence or documents should be submitted at the Hearings or afterwards unless specifically requested.

It would be helpful to me if statements focused on:

- What part of the Plan is unsound?
- Which soundness test of those set out in the National Planning Policy Framework (and detailed in paragraph 6 above) does it fail?
- Why does it fail (probably summarising the key parts of your original representation)?
- How can the Plan be made sound?
- What is the precise change/wording that you are seeking?

The guidance note also includes an appendix which provides direction on the format for further statements. If you have any queries relating to the guidance note or making a further statement I suggest you contact the Programme Officer, Miss Helen Nolan on 07773 615820 or via e-mail at atplp.programmeofficer@dorsetcouncil.gov.uk . If you have further questions relating to this e-mail please call me on 0192955385.

Yours sincerely

Steve Boyt
Planning Policy Officer
Planning and Community Services

Dorset Council

01929557385
dorsetcouncil.gov.uk

Post Green.
Lytchett Minster,
Poole,
Dorset.
BH16 6AP

6th June, 2019.

Response to Inspector's Matters, Issues and Questions.

Matter D: The Strategy for Development – Spatial Strategy

Q1. Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- the identification and assessment of reasonable alternatives; and
- the overall scale and distribution of development?

Flood risk in Lytchett Minster.

In document: "Reviewing the Plan for Purbeck's future, Strategic Flood Risk Assessment, January 2018", Purbeck District Council rely upon The Lytchett Minster Flood Risk Study (May 2017) to inform decisions made relating to development in Lytchett Minster. It is the view of The South Lytchett Estate that this desktop report is incorrect and relies heavily for evidence upon reports of flooding generated by a group opposing development in Lytchett Minster. No evidence was sought from the South Lytchett Estate. The Lytchett Minster Flood Risk Study is therefore lacking in impartiality.

This report has since been updated and in many aspects contradicted by a thorough report based on real evidence

compiled by Dorset County Council. It is the belief of The South Lytchett Estate that the Plan bases decisions upon partial and dated evidence. As a result the plan fails to assess correctly the reasonable and possibly better alternatives.

South Lytchett Estate believes primarily that the Plan should be considered unsound through a failure to collect evidence impartially and to update evidence timeously. Alternatively the Inspector should assert the need for the new Dorset Council to disregard the Jacobs report and use best scientific evidence when reaching future decisions.

Settlement Hierarchy.

In document: "Reviewing the Plan for Purbeck's future. Settlement Strategy Update, June 2017", Lytchett Minster is categorised as "Other Village with a Settlement Boundary". This Settlement Hierarchy is used to inform Policy SD: Presumption in Favour of Sustainable Development.

The South Lytchett Estate believes either basic errors have been made in categorising Lytchett Minster or alternatively the methodology used in establishing the Settlement Hierarchy is inappropriate for Lytchett Minster thereby leading to a result which is fundamentally flawed.

Given the geographical location of Lytchett Minster and the scale of facilities offered in Lytchett Minster, The South Lytchett Estate feels the potential for development has been incorrectly assessed by Purbeck District Council. As a result the Plan has fails to correctly assess the reasonable alternatives for development and the distribution of development.

The South Lytchett Estate believes the Plan should be considered unsound as a result of a failure to ensure best evidence is used when reaching decisions. Alternatively the South Lytchett Estate would urge the Inspector to

recommend the new Dorset Council reassess the position of Lytchett Minster in the Settlement Hierarchy or consider whether the unique nature of Lytchett Minster renders it unsuitable for categorization within the current method used.



Clare Lees.



Examination of the Purbeck Local Plan Matter D: The Strategy for Development – Spatial Strategy

Statement on behalf of Bloor Homes Southern

Q1. Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- **the identification and assessment of reasonable alternatives; and**
- **the overall scale and distribution of development?**

1. As stated in Bloor Homes' statement to Matter B, Bloor Homes considers that many of the homes allocated in the plan will be slow to deliver.
2. A very high proportion of the allocated homes are distributed to settlements in the west of the district. There is a risk of market demand in the western areas being lower (due to their rurality), and viability more challenging, resulting in development delivery being much slower than anticipated by Purbeck District Council / Dorset Council. This will constrain the ability of the plan to significantly boost the supply of new homes.
3. Bloor Homes considers that more sites are needed in the plan area to meet higher housing requirements of the South East Dorset area generally, but also to safeguard against slow delivery in western Purbeck. This is best considered comprehensively through the preparation of a new Dorset Council Local Plan.
4. Through its representations Bloor Homes has promoted the strategic development potential of land in the Lytchett Minster area. Development options at Lytchett Minster and the nearby Bere Farm area were considered in earlier drafts of the local plan, but have not subsequently been taken forward by the planning authority.
5. Site selection background paper [SD54], January 2018 notes the following matters in relation to the consideration of this area:
 - Settlement hierarchy: services and facilities
 - The need for further evidence on flooding, and
 - The role of this land in the green belt and the need for new homes across the district.
6. Through Bloor Homes' review of plan evidence the following matters are highlighted in particular, which call into question the council's assessment of reasonable alternatives and the weighting of the above matters:
 - The use of the settlement hierarchy as identified by Purbeck Local Plan 1 for the purposes of indicating suitable development locations is unsound insofar as it categorises settlements on the basis of a review of the existing services and facilities they contain, and overlooks the availability and accessibility of higher order services and facilities from neighbouring / nearby settlements. In particular,



the sustainability benefits of proximity to the conurbation are not adequately considered as part of the assessment of reasonable alternatives. In the case of Lytchett Minster the existence of a major secondary school in the village, the location of the village on main a bus route, and the proximity of this village to wider services and facilities in Lytchett Matravers, Upton and Poole (including the potential for further improvements in local connectivity by cycle and walking) is not attributed enough weight by the plan and its evidence.

- The strategic flood risk assessment (SFRA) [SD17] findings for the Lytchett Minster area, which rely on a desk top assessment by the Environment Agency, are flawed and require update in the light of recent modelling work in the area by the Lead Local Flood Authority. The appended letter from Clarke Bond provides more details. The Inspector is asked by Bloor Homes to disregard the findings of the SFRA as they relate to Lytchett Minster, with a corrected situation being reported on and agreed through an early update to the SFRA.
- The Purbeck green belt study 2018 [SD51] involves a somewhat arbitrary selection of assessment parcels at various sizes, and sometimes inconsistent assessment between them. Moreover, in view of the likelihood of unmet needs from adjoining authorities in the plan period there is a need to consider a wider, more strategic review of the green belt. This is evidenced by the (former) Dorset planning authorities SoCG [SD10a], which states at paragraph 26:

...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, including making best use of brownfield sites, optimising the density of development, and discussing with neighbouring authorities whether they could accommodate some of the identified need, as demonstrated through the statement of common ground. Before any amendment to Green Belt boundaries in South East Dorset, therefore, it will need to be demonstrated that this latter solution has been properly considered through joint working'

7. In view of the above we urge the Inspector to make strong recommendations to Dorset Council to robustly assess the reasonable alternatives for development, and update its spatial strategy, either through amendment to this plan and its evidence, or through the preparation of a new Dorset Plan. This should be informed by:
- An improved evidence base on the relative sustainability of locations across the plan area (both as existing and taking account of realistic potential for improvements). The shortcomings of a Purbeck LP1 settlement hierarchy-led approach to distribution must be highlighted (NB – the submission plan's use of a settlement hierarchy in its glossary, without review from the 2012 LP1, is inappropriate)
 - Corrected evidence on flood risk
 - A strategic green belt review that considers the increased housing needs that will need to be accommodated in the Dorset Council area in the plan period (as

indicated by the SoCG SD10a) and wider matters of co-operation with neighbouring authorities.



Q2. Is the scale, type and distribution of development as set out in policy V1 (Spatial strategy for sustainable communities) justified, effective and consistent with the overarching vision and spatial strategy of the Plan?

8. Paragraph 42 of the submission plan states that the most favoured distribution option from the results of consultation was the one that sought to spread development as much as possible, including releasing some areas of the green belt for homes as well as providing homes in the less environmentally constrained west of the District.
9. It adds at paragraph 43 that the preferred approach should ensure that the District's housing needs can be met in sustainable, accessible locations.
10. The scale and distribution of development set out in policy V1 is inconsistent with the above principles. A very high proportion of the allocated homes are distributed to settlements in the west of the district. There is a risk of market demand in the western areas being lower (due to their rurality) and viability more challenging, resulting in development delivery being much slower than anticipated by Purbeck District Council. This will constrain the ability of the plan to significantly boost the supply of new homes.
11. In general, the most sustainable, accessible and deliverable locations for new homes in Purbeck are in the east of the district, close to the conurbation. The spatial strategy of policy V1 does not reflect this.
12. In its local plan representations, Bloor Homes identifies the strategic development potential of land in the Lytchett Minster area. Development options at Lytchett Minster and the nearby Bere Farm area were considered in earlier drafts of the local plan, but have not subsequently been taken forward by the planning authority. This area is well placed to deliver a large allocation of new homes together with large, attractive areas of mitigation greenspace, as recognised by the panel examining the former draft regional spatial strategy for the South West.

Q3. Should policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?

13. No comment.

Q4. Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council's vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?

14. No comment.



Q5. How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?

15. No comment.

Q6. Is the change to policy V1 (MM1) indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is effective?

16. No comment.

Andrew Elliott MRTPI
 Technical Director
 Terence O'Rourke Ltd
 Everdene House,
 Deansleigh Road,
 Bournemouth BH7 7DU

B04293-CLK-XX-XX-RP-FH-0001

6th June 2019

Dear Andrew,

Re: Purbeck Local Plan: SFRA and Lytchett Minster Flooding

This letter has been prepared by Clarkebond to provide our headline comments on the current Purbeck Level 1 Strategic Flood Risk Assessment, published in January 2018 (SFRA). This document, which is a substantial part of the supporting flood risk evidence for the Purbeck Local Plan, is flawed, in so far as it relates to flood risk in Lytchett Minster (and Upton Parish) as its conclusions are based on an outdated and inaccurate report, modelling and anecdotal flood risk information.

This conclusion is made after:

- Reviewing Purbeck Level 1 Strategic Flood Risk Assessment, published in January 2018.
- Reviewing the Lytchett Minster Flood Risk Study (IMSW002130, October 2016), produced by Jacobs on behalf of the Environment Agency (EA).
- The findings from the new hydraulic modelling undertaken by Dorset County Council in their capacity as the Lead local Flood Authority (LLFA) for the area, which includes Lytchett Minster. (This work was undertaken in 2018)
- Production by Clarkebond of a phase 1 Geotechnical desk based study

The SFRA contains a number of statements, maps and plans of fluvial flood risk of main rivers in the Lytchett Minster and Lytchett Matravers catchment areas (i.e. Sherford River and its main tributaries), and tidal and coastal flood probability maps. It also contains information on groundwater and surface water flooding and where the SFRA makes reference these (in part as fluvial flood risk from ordinary watercourses*), it relies entirely on the EA commissioned desktop based Lytchett Minster Flood Risk Study (Jacobs, May 2017).

The Jacobs study (on which the comments about Lytchett Minster in the SFRA are largely based) has been found to be inaccurate in a number of significant areas.

For example, it has been found to be inaccurate in estimating the number of existing households that were suggested to be at risk of ordinary watercourse flooding in Lychett Minster village. In the 1 in 100 year flood event it notes 40 properties, in the 1 in 30 year event 31 properties (Table 5.9).

* *Main rivers are usually larger rivers and streams and come under the control of the EA, Other minor rivers, streams and ditches are called 'ordinary watercourses' and come under the control of LLFA.*

Bristol, Exeter, London

Clarkebond (UK) Limited
 Registered in England & Wales No 7775761
 Registered Office: 129 Cumberland Road, Bristol BS1 6UY



Certificate Nos. C162818 Q, E, BIM

The logo for Clarkebond, featuring the word "clarkebond" in a lowercase, sans-serif font, centered within a bright yellow rectangular background.

On the basis that any work to look at ordinary watercourses falls to the LLFA, the EA requested that the LLFA undertake an assessment of the pluvial (surface water) flooding at Lytchett Minster as they considered this to be a more important issue for Lytchett Minster than any fluvial events in the main rivers.

The LLFA has undertaken detailed surveys, walkovers and household interviews in order to produce their hydraulic modelling. This modelling was used to produce detailed flood risk maps of ordinary watercourses (e.g. Lytchett Minster Stream and Hill Farm Stream etc.). The LLFA's assessment conclusions have reduced the number of properties from the 40 quoted to just 12 in the 1 in 100 year event, and from 31 to just 5 in the 1 in 30 year event currently at flood risk in the village from Pluvial (ordinary watercourse) flooding. Further work we understand is ongoing to look at each of these individually to look at the very localised problem and to assess if matters can be addressed further.

We understand that the results of this modelling have been recently shared with the local planning authority, and follows meetings with local representatives.

In the consideration of the perceived groundwater flooding, the assessments and suggestions in the Jacobs report are not borne out by findings on site and in a phase 1 geotechnical desk study of the anticipated ground conditions expected.

Further investigation and assessments determine that there are also a number of other shortcomings and inaccurate assumptions made by the Jacob's flood study.

As you can see from the latest work, there are ramifications for Lytchett Minster and this work cast significant doubt on the conclusions reached in the Jacobs report and hence the SFRA which is being used as evidence in support of the Local Plan.

We therefore urge that the planning authority and Inspector disregard the current SFRA findings for Lytchett Minster and Upton Parish pending a thorough update to take account of the latest important LLFA and other information. This update can be considered and agreed in due course to ensure that an accurate flood risk evidence base is established for the next Plan.

Yours sincerely

A solid black rectangular box used to redact the signature of Max Thurgood.

Max Thurgood
Director

For and on behalf of Clarkebond (UK) Limited

**PURBECK LOCAL PLAN
MATTER D: THE STRATEGY
FOR DEVELOPMENT -
HEARING STATEMENT**

Table of Contents

1.0	<i>Issue 1 – The Spatial Strategy</i>	1
-----	---------------------------------------	---

Appendix 1

PURBECK LOCAL PLAN PARTIAL REVIEW ADVISORY GROUP - DRAFT PARTIAL REVIEW PREFERRED
OPTIONS CONSULTATION DOCUMENT (EXTRACT)

1.0 Issue 1 – The Spatial Strategy

- 1.1 A & F Baggs and Bellway Homes Limited (Bellway) have not provided comments on all of the questions in relation to the Spatial Strategy. The following responses focus on those questions considered relevant to the promotion of land to the West of Wareham, which was initially a preferred allocation in the Local Plan but has subsequently been overlooked in favour of alternative sites without proper assessment or justification.

Q1. Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- the identification and assessment of reasonable alternatives; and
- the overall scale and distribution of development?

- 1.2 A & F Baggs and Bellway do not consider that the Spatial Strategy is justified or consistent with national policy due to the lack of consideration of reasonable alternatives. The assessment of alternatives has been set out in the various Sustainability Appraisal (SA) documents prepared since spring 2016.
- 1.3 The initial SA report (June 2016) (SD50) assessed the impacts of the options under consideration. In relation to the Spatial Strategy, this included six options for settlement extensions and seven potential 'large' allocations', including land to west of Wareham. At this stage, focusing development on the towns (option 3b) and allocation of land to the west of Wareham (option 4b) were assessed as being the most sustainable options.
- 1.4 However, by the time the next SA report was published in relation to the New Homes For Purbeck consultation (January 2018) (SD52), the options being considered for Wareham, noted in the original consultation as the most appropriate location for accommodating growth, had been limited to Neighbourhood Plan sites. This is confirmed in the table on page 34 and at paragraph 6.3.
- 1.5 Therefore, whilst appearing at the outset to identify and consider a full range of options, a decision appears to have been taken to exclude consideration of any significant allocation at Wareham, despite the early stages of the process identifying it as the most sustainable location for growth.
- 1.6 In addition, A & F Baggs and Bellway would point out that land to the west of Wareham lies outside of the Wareham Neighbourhood Plan area despite adjoining the town. This was verified by LPA in the Purbeck Local Plan Partial Review Advisory Group - Draft Partial Review Preferred Options consultation document (see extract at **Appendix A**), dated 19 April 2016, which stated:
- "The site is in Arne parish, but it would effectively be an expansion of Wareham, which is a town.*
- 1.7 Limiting the alternatives for growth of Wareham to Neighbourhood Plan sites has therefore inappropriately and incorrectly ruled out further consideration of land west of Wareham – despite stage 1 suggesting it was the most sustainable location for a large site allocation.

- 1.8 This is a serious error in the plan making process which in our view leads to the plan being unsound.
- 1.9 To be found sound, the full range of reasonable alternatives needs to have been considered and this cannot be the case until land west of Wareham has been considered as an alternative to those sites proposed for allocation in the plan, each of which are in less sustainable locations.
- 1.10 With regard to the distribution of development, the Local Plan (at paragraph 35) acknowledges that many residents look to the Poole/ Bournemouth area, to the east of the District, for work and shopping. Paragraph 37 goes on to state that some facilities in Purbeck's towns and villages have struggled to remain open and the accessibility to facilities and services is a key issue in many parts of the District.
- 1.11 The east of the District is therefore best located from an economic and social position. However, it is the most constrained in environmental terms, which poses a challenge to plan making. As is discussed further in relation to Question 2 below, the Council appear to have pursued a strategy that simply rules out any development in environmentally constrained areas rather than considering social and economic factors alongside the environment in a balanced manner. This results in a distribution of development which is not properly justified.
- 1.12 A & F Baggs and Bellway also contend that the need to support the role of larger settlements, such as Wareham, and their position as centres for their wider rural hinterland (as supported by paragraphs 78 and 85 of the NPPF 2019) further adds to the case that the east of the District should be a focus of development, particularly as the Plan suggests some centres in the District have been struggling.
- 1.13 Directing minimal growth to the most sustainable settlements means that other, less sustainable development locations have to be selected. Not only does the allocation of such sites have potentially negative and social and economic impacts, it also increases the need to travel, increases pollution, as is noted in the initial SA of options, and is also less viable, given the need for significant investment in off-site infrastructure to improve their accessibility. This further adds to A & F Baggs and Bellway's view that there is a case for considering development in the AONB as part of the development strategy.

Q2. Is the scale, type and distribution of development as set out in policy V1 (Spatial strategy for sustainable communities) justified, effective and consistent with the overarching vision and spatial strategy of the Plan?

- 1.14 Policy V1 sets out the land allocations which will be made as part of the 'vision' for Purbeck. The strategy includes four new allocations at Moreton Station (490 homes), Wool (470 homes) Lytchett Matravers (150 homes) and Upton (90 homes). The policy also clarifies that the proposed Neighbourhood Plan allocations in Wareham (200 homes on allocated sites plus 100 windfall) and in Bere Regis (105 homes) form part of the overall strategy to meet identified housing need.
- 1.15 Policy V1 is unsound as the spatial strategy:
- a) fails to reflect the Settlement Hierarchy set out in the Glossary to the Local Plan. This settlement hierarchy includes Wareham as one of three 'towns' at the top tier – it is therefore identified as one of the most sustainable locations for growth. By not allocating development in accordance with the settlement hierarchy, the plan has not been positively

prepared in accordance with the principles of sustainable development set out in the Framework.

b) is not justified by the proper consideration of reasonable alternatives;

c) is not based on a robust evidence base prepared by the Local Planning Authority (LPA);
and

d) is ineffective as it does not set out a strategy which will deliver the full housing requirement for the district.

- 1.16 Swanage is the largest settlement in Purbeck and is the subject of a recently adopted Plan which sets out how 200 homes will be built in the town by 2027 as part of 960 dwellings in the South East of the District (the majority of which are expected to be built in Swanage – Swanage Local Plan paragraph 134). 50 of these homes were allowed on appeal, prior to the adoption of the plan meaning the plan makes specific provision for 150 new dwellings with the remainder, it is assumed, to be windfall development. Given this plan was adopted in 2017, logically, Swanage is not subject to any additional allocations in the Purbeck Local Plan.
- 1.17 Wareham (population of 5,496) sits alongside Upton as the other two main ‘towns’ in the District. Both have limited levels of growth allocated to them in the Pre-Submission version of the Plan despite 49% of the district’s population being located in these settlements (plus Swanage).
- 1.18 Overall just 24.6% of allocated development (excluding the assumed windfall allowance in the emerging Wareham Neighbourhood Plan) is directed to the most sustainable locations in the District over the plan period – in principle this is not considered to be a sustainable approach as it directs 75.4% of all allocated development to smaller, less sustainable settlements. Such an approach is contrary to the thrust of the National Planning Policy Framework, 2019 (the ‘NPPF’) particularly chapter 9 (Promoting sustainable transport) and chapter 7 (Ensuring the vitality of town centres).
- 1.19 It appears that this approach is based on a desire of the community to see a dispersed pattern of development and a consideration that the west of the district is less constrained environmentally. Whilst this may be the case, the NPPF (2019) is clear at paragraph 8 that the economic, social and environmental objectives of the sustainable development are ‘*interdependent and need to be pursued in mutually supportive ways*’. The proposed strategy is too focused on environmental considerations without giving due consideration the most ‘sustainable’ locations for growth.
- 1.20 At Preferred Options (Regulation 18) stage (June 2016), land West of Wareham was included within the preferred spatial strategy as a site for 500 dwellings. However, in the Pre-Submission version of the plan, development in Wareham is limited to the proposed allocations in the Neighbourhood Plan plus an allowance for windfall development over the plan period (300 units in total). The rationale for this change in strategy, effectively halving the level of development to be directed to one of the District’s most sustainable locations, in our view, does not appear to be clearly justified by the evidence presented, other than there is local support for such an approach.
- 1.21 In addition, A & F Baggs and Bellway consider it is important that the Local Plan makes sufficient allocations to ensure the housing requirement will be delivered within the plan period. To this

end, as drafted, the Local Plan does not appear to include any flexibility or contingency to allow for under-delivery on individual sites.

- 1.22 We consider it is now standard practice for Local Plans to provide a buffer in land supply to allow for this and increase the probability of the minimum housing requirement to be met.
- 1.23 We would suggest that to be effective, land for at least a further 270 homes (10% of the requirement) needs to be identified within the Spatial Strategy set out in policy V1.
- 1.24 Of particular concern is the decision to allocate land at Moreton Station which at 490 dwellings, makes a similar contribution in terms of housing numbers as land West of Wareham would. This proposed development is disproportionately large when compared with the size and sustainability of the existing settlement (Moreton parish has fewer than 200 dwellings according to 2011 census data).
- 1.25 This site is located near to the village of Crossways in West Dorset. Crossways is limited in terms of services and facilities with a small shop, post office and first school. It is isolated from the major source of employment to the east of the district in Poole and Bournemouth and is also 10km from both middle and secondary schools (at Puddletown and Dorchester). The site has a no physical relationship to the town, requires significant investment in offsite infrastructure and also has uncertain deliverability given the ongoing mineral extraction being undertaken on site.
- 1.26 Sites such as this will inevitably have uncertain delivery trajectories which the plan should take into account and effectively over-allocate to maximise the chance of the housing requirement being delivered in a timely manner. Without an increase in the scale of development land allocated, the Local Plan is unsound as it is unlikely to be effective in delivering the number of homes required in the area.
- 1.27 The distribution of development would be improved by removing the 490 proposed dwellings from Moreton Station, and allocating these to more sustainable sites. A & F Baggs and Bellway consider that land west of Wareham is the most appropriate alternative, due to its more sustainable location, and compliance with NPPF chapter 7 (Ensuring the vitality of town centres) and chapter 9 (Promoting sustainable transport).

Q4. Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council’s vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?

- 1.28 It is not considered that relying on Neighbourhood Plans to deliver the vision and strategic policies of Purbeck is consistent with national policy. Paragraph 17 of the NPPF (2019) states that:

The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area.

- 1.29 Paragraph 20 goes on to state that:

Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development

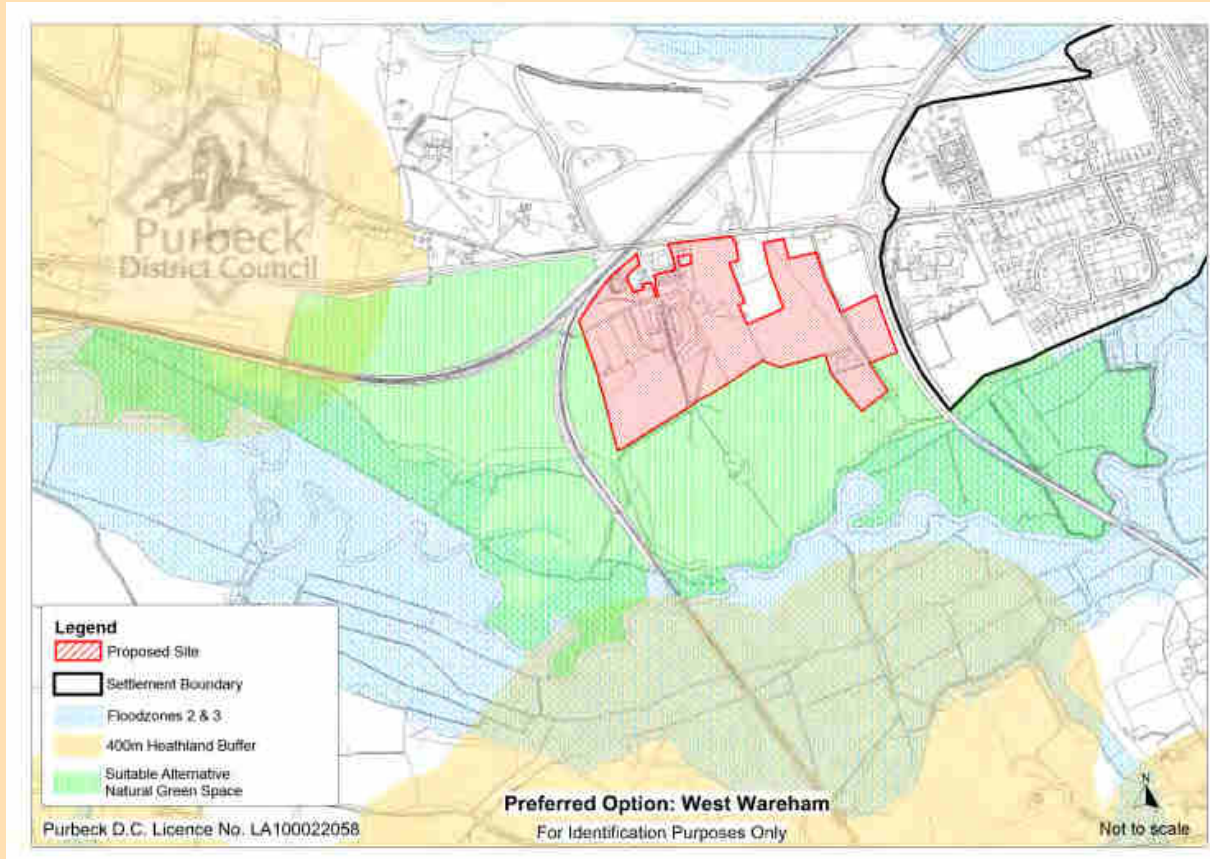
- 1.30 In this case, the Council are limiting the strategy for the pattern of development for the District based on the content of a non-statutory Neighbourhood Plan. Whilst it is appropriate for the Local Plan to have regard to the policies of emerging Neighbourhood Plans, it is inappropriate for these plans to effectively limit development in the most sustainable locations to the detriment of the overall development strategy.
- 1.31 In addition, notwithstanding the level of development directed to Wareham, A & F Baggs and Bellway also have concerns with the potential deliverability of sites proposed for allocation in the Wareham Neighbourhood Plan. The NPPF (2019) paragraph 67, sets out that:
- ...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*
- 1.32 A & F Baggs and Bellway have concerns that the deferring allocations to Neighbourhood Plans means that potentially undeliverable sites, less suitable than land West of Wareham, will be allocated. Table 1 of the submitted Wareham Neighbourhood Plan clarifies that delivery of homes on sites proposed for allocation are subject to either the relocation of health facilities or are existing industrial estates where the full capacity 'may not' be realised in the Plan period. This suggests delivery is uncertain, conflicting with the requirements of the NPPF.
- 1.33 For clarity, due to the boundary of the Wareham Neighbourhood Plan area, land west of Wareham is not eligible for consideration in the Neighbourhood Plan, despite offering a potentially well-connected edge of town site. The Neighbourhood Plan is therefore by default forced to focus on less appropriate sites, including currently occupied industrial estates and Green Belt land. This exclusion of a key viable site makes the Neighbourhood Plan process an inappropriate vehicle for allocating housing development in this case.

APPENDIX 1

PURBECK LOCAL PLAN PARTIAL REVIEW ADVISORY GROUP - DRAFT PARTIAL REVIEW PREFERRED OPTIONS CONSULTATION DOCUMENT (EXTRACT)

Preferred Options

Wareham Town



Wareham Town

The Council's preferred option is for around 500 homes in this location. Whilst the Council is mindful of public opinion being less favourable towards development west of Wareham, it needs sound planning reasons to rule the site out. The key outstanding issue that the Council is currently working to resolve is whether or not the landscape impacts on the AONB could be moderated to an acceptable level. If the landscape issues cannot be moderated, the Council will need to find alternative land for development.

The site is in Arne parish, but it would effectively be an expansion of Wareham, which is a town. Policy LD (General Location of Development) of the PLP1 lists towns as the most sustainable settlements in the district and this is where development should be focussed, wherever possible.

Dorset County Highways has confirmed that the site could be developed satisfactorily from a transport perspective, including impacts on the A351, subject to provision of appropriate mitigation. Highways improvements could include footpath and cycle links to the existing network, Purbeck School and the Railway Station, and the creation of a new 30mph gateway into Wareham.

Preferred Options

Natural England has confirmed that open space (SANG) could be delivered around the periphery of the site to mitigate impacts on nearby heathland. This would open up around 94ha of open space in the AONB to the public.

In addition to the SANG, there could be potential for a new local centre (small scale employment and retail); a new primary school; allotments; and play areas and other open space.

The Council would welcome your views as to the supporting infrastructure or services and facilities that should be provided as part of the development scheme.

Purbeck Local Plan
Submission Draft Plan – January 2019

Statement on Matter D: Spatial Strategy

By

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

Representation no. 1190693

June 2019



Matter D: The Strategy for development

Issue 1: Spatial Strategy.

Q1. Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:

- ***the identification and assessment of reasonable alternatives; and***
- ***the overall scale and distribution of development?***

The landowners concur with the current allocation of 470 new homes at Wool in Policy V1: Spatial strategy subject to issues raised in response to Question 3 following.

As stated in Para 7 of the Memorandum of Understanding (MOU) with the Council:

Development of the H5 Wool allocation is expected to deliver a high quality, sustainable development as an extension to the existing settlement of Wool which is defined as a key service village at the second tier of the settlement hierarchy. An objective of detailed design and layout will be to integrate the development into the existing settlement to respect the nearby listed buildings within East Burton, the setting of the nearby AONB and provide an appropriate entry point to the settlement.

Para 8 states:

The Council, landowners and other stakeholders are committed to working collaboratively and constructively to ensure delivery of the proposed allocation.

In para 9 the merits of Wool as a sustainable location for additional development are set out:

Wool is designated as a key service village, and with a population of c. 5,761 is the largest of the second tier settlements. It offers a range of services and facilities including: mainline railway station, pre-school, two primary schools, community centre (the D'Urberville Centre), GP surgery (the Wellbridge Practice) and post office, as well as employment opportunities at the Dorset Innovation Park. It also has a small number of shops that can meet some day to day needs. This status, together with the context of the significant ecological, green belt, heritage, landscape and flooding constraints across a wide area of the former District results in Wool being an appropriate location for development as it is not subject to these constraint designations.

Para 11 justifies the choice of the Wool site:

The identification of this site follows an assessment of potential locations/settlements across Purbeck with the lowest constraints and highest infrastructure capacity and a subsequent site selection process drawing upon the SHLAA and considering absolute constraints, major policy constraints, deliverability, preferred sites, public consultation, SA and HRA....

Para 12 continues:

The parties agree that the H5 Wool allocation is suitable, available and deliverable (in accordance with the trajectory set out in the delivery section below) for 470 houses, a 65 bed care home, community facilities and supporting infrastructure. It is not subject to any insurmountable environmental, legal, ownership or technical constraints that would otherwise impede development...

In para 15 the MOU states:

There is a clear intention and demonstrable ability to develop the site if allocated. Both parties are committed to facilitating the early delivery of the site and the essential infrastructure required as part of the development at the earliest opportunity

The MOU goes on to deal with detailed matters on:

- Affordable Housing and Housing Mix – *both parties agree that the site should provide a range of different size dwellings and tenure. Viability assumptions are to be discussed further. It is agreed that the: Site should provide a sensitively designed care home.*
- Physical Requirements – No insurmountable drainage or flooding constraints are identified.
- Transport - *the site is well located in relation to a number of the existing facilities in Wool and that these are accessible by sustainable travel options.*
- Social, Community and Retail – Appropriate provision is agreed.
- Green Infrastructure – Significant provision of open space is agreed.
- SANG – Suitable provision is agreed.
- Ecology - *no significant ecological constraints have been identified. Further mitigation agreed.*
- Landscape - *no significant landscape constraints to the development. Sensitive design approach with significant mitigation.*
- Archaeology and Historical Interest - *the potential for archaeological interest is confirmed as limited to the SAM and the adjoining land parcel to the north. Trial trenching ... has confirmed a low potential for archaeological remains.*
- Other constraints – pipeline issues investigated and no significant constraint.
- Viability – Agreed policy H5 that allows the consideration of site specific factors that may affect viability at the application stage is useful. Matters not agreed are detailed later in the MOU, such as affordable housing provision.
- and
- Delivery - Agreed that *the H5 Wool allocation is capable of delivery of dwellings within the Plan period (470) with a minimum delivery trajectory 2021 – 2028.*

Q2. Is the scale, type and distribution of development as set out in policy V1 (Spatial strategy for sustainable communities) justified, effective and consistent with the overarching vision and spatial strategy of the Plan?

An area of disagreement is identified in the MOU in para 57 and relates to the:

- Capacity of sites available at Wool:

The landowners believe the identified number for Wool in policy V1, H2 and H5 should be a minimum rather than a maximum target to ensure the housing need is fully met by allowing for under delivery of other homes elsewhere in the plan area. (Comment reference PLPP500 of Savills response to the pre-submission draft Purbeck Local Plan).

Q3. Should policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?

Bearing in mind the Council's reliance on 933 dwellings from small sites and windfall in Policy H2: The housing land supply, which is equivalent to 35% of the overall supply, the Inspector is correct to raise this significant omission in policy V1.

However, in raising this, the Inspector flags a greater issue:

Is there an over reliance on small sites and windfall in the Council's overall spatial distribution of housing in Policy H2? The Wool landowners believe there is, with 933 dwellings being by far the highest portion of the proposed overall distribution of 2,688 at 35%.

At the earlier Issues and Options stage of the Plan (New Homes for Purbeck 2018) Wool was identified in three options for housing growth with three differing scales of development 470, 650 and 800 homes. (See Appendix with relevant masterplans.) All options identified were in 'suitable, available locations' which the Council believed at the time to be 'realistic and deliverable'. For the option with 800 homes the small sites and windfall allowance was zero. At the Reg 18 stage in March 2018 the landowner submitted the *Concept Framework, Wool, Dorset* confirming how these could be accommodated on the site.

In para 58 of the MOU (Areas of Disagreement) the landowners confirm their concern over this over-reliance on small sites and windfall stating that:

The landowners believe there is an over reliance in policy H2 on the proposed delivery of 933 homes through unidentified small sites next to existing settlements and windfall within existing settlements. They would like the examiner to appreciate that at least 800 homes could be delivered at Wool (as confirmed in the response reference PLPP500 to the pre-submission draft Purbeck Local Plan) without an unacceptable impact arising (i.e. 330 above the current 470 allocation).

Q4. Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council's vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?

No comment

Q5. How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?

No comment

Q6. Is the change to policy V1 (MM1) indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is effective?

Whilst the change removes reference to policy H8: Small sites in section 4 of the policy, small sites should still be referred to in Policy V1 because of the major current reliance the Council has on them for its housing land supply.

Statement on Matter D: Spatial Strategy

List of appendices

Appendix 1 – Wool Vision Plan – 470 homes

Appendix 2 – Wool Vision Plan – 650 homes

Appendix 3 – Wool Illustrative masterplan – up to 1000 homes

Appendix 1 – Wool Vision Plan – 470 homes



Approximate Total no. of new dwellings:	470 homes
Total housing area:	13.22ha

title: Wool Vision Plan - 470 homes

project: Wool Development

revision: A (6 June 2019)

client: Weld Estate/Redwood Partnership

date: 28 March 2019

job no: WIPL 425429

drawn by: SM/VT

drawing no: MP003

checked by: RB

- Land reserved for future school, if required
- Neighbourhood Equipped Area for Play
- Local Equipped Area for Play
- Public open space
- SuDS basin/public open space
- Land reserved for future school, if required
- SuDS swale
- Existing public right of way
- Proposed pedestrian and cycle link to wider countryside/rights of way
- Site Boundary
- Scale 1:5000 @A3
- 20m buffer from pipeline centre (suggested maximum working area to allow pipeline removal)

Appendix 2 – Wool Vision Plan – 650 homes



title: Wool Vision Plan - 650 homes
 project: Wool Masterplan
 client: Weld Estate/Redwood Partnership
 job no: WIPL 425429
 drawing no: MP002
 revision: -
 date: 03 December 2018
 drawn by: SM
 checked by: RB

- Land reserved for future school, if required
- Neighbourhood Equipped Area for Play
- Local Equipped Area for Play
- Public open space
- SuDS basin/public open space
- SuDS swale
- Existing public right of way
- Proposed pedestrian and cycle link to wider countryside/rights of way
- Site Boundary
- Scale 1:5000 @A3

Appendix 3 – Wool Illustrative masterplan – up to 1000 homes



title **Illustrative Masterplan**

project Wool Masterplan

client Weld Estate/Redwood Partnership

job no WPL 262769

drawing no MP001

revision C (07 Mar 2018)

date 07 Jan 2016

drawn by SP/ SM

checked by CO/ RB

Development Parcels

Public Open Space

School Grounds

Existing Road

Proposed Primary Street

Proposed Secondary Street

Public Rights of Way

Proposed Footpath

Trees/ Hedgerows

Listed Buildings

Proposed Local centre

Vehicle Access Point

Cycle and Pedestrian Access

Allotment

Sport Pitches

NEAP

LEAP

Area of Natural Play

SuDS

Community Garden

Food Store

Community Centre & Village Hall

The Wellbridge Practice

Site Boundary

Scale 1:5000 @A3

urban design studio

Southampton
Birmingham
Cambridge
London
Oxford
savills

savills.com/urbandesign

Examination of the Purbeck Local Plan

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

Submitted by Wareham Neighbourhood Plan Steering Group (ID 1188328)

MATTER D: The Strategy for Development

Contents

Issue 1: Spatial Strategy	1
Q4. Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council’s vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?	1
Q5. How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?	3
Appendix 1 – Wareham Neighbourhood Plan	6

Issue 1: Spatial Strategy

Q4. Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council’s vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?

1. It is clearly the intention of the NPPF that Neighbourhood Plans can deliver some if not all of the strategic housing need for the area.
2. Paragraph 65 of the NPPF advise on how a housing requirement figure is reached. An important point to note is that it states it first describes how the figure is calculated by the strategic policy-making authority for its entire area, and then goes on to say that “within this overall requirement” housing requirements for neighbourhood plan areas are set – so it is really clear that the housing requirements for neighbourhood plan areas contribute towards the requirement rather than being an add-on.

*65. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. **Within this** overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations³⁰. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.*

3. In paragraph 23 the NPPF talks about land use designations and allocations to address the objectively assessed needs over the plan period, and makes clear that non-strategic policies can be used for this –

again clearly indicating that, provided the housing strategy is delivered. it is not necessary for the Local Plan to specifically allocate every site if there are other mechanisms that can reasonably be relied upon.

4. Paragraph 69 goes on to states that:

Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a [ie no more than 1ha]) suitable for housing in their area.

This does not expressly limit Neighbourhood Plan allocations to sites of less than 1ha.

5. The accompanying guidance (Reference ID: 41-042-20170728) states that “A neighbourhood plan can allocate sites for development, including housing.” The following paragraph (Reference ID: 41-043-20140306) clarifies that

If a local planning authority is also intending to allocate sites in the same neighbourhood area the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process.

It also states (Reference ID: 41-044-20190509) that

A neighbourhood plan can also propose allocating alternative sites to those in a local plan (or spatial development strategy), where alternative proposals for inclusion in the neighbourhood plan are not strategic, but a qualifying body should discuss with the local planning authority why it considers the allocations set out in the strategic policies are no longer appropriate.

6. All of this points towards the conclusion that Neighbourhood Plans can play an important role in delivering the strategic housing requirements for an area, and in this sense there is no fundamental conflict with National Policy.
7. Having said that, V1 as worded is slightly clumsily, and potentially open to challenge in that it reads “the Purbeck Local Plan allocates sites for housing as follows... (b) Neighbourhood plan sites at: Wareham – 300 new homes including windfall...” – yet the Local Plan itself does not allocate the Neighbourhood Plan sites. A better form of wording would be:

Policy V1: Spatial strategy for sustainable communities

1. To deliver the Council’s vision for Purbeck, the Purbeck Local Plan ~~allocates~~ ~~supports~~ sites ~~for~~ housing as follows:

(a) Sites allocated ~~sites~~ through this Local Plan:

[details], ~~and~~

(b) Sites delivered through Neighbourhood plan policies and allocations ~~sites~~ at:

Wareham – 300 new homes including windfall, ~~and~~

Bere Regis...

Q5. How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?

8. The details of this are set out in the submission draft of the Wareham Neighbourhood Plan¹ – which at present does not appear to be included in the Examination Library, so we have attached a copy (Appendix 1).

9. The plan includes 6 site allocations within the existing settlement boundary (Policies H5-H8 and GS2) which are estimated as likely to deliver 140 new dwellings over the plan period. It also includes a windfall estimate of 100 dwellings within the settlement boundary (which is evidence-based, having considered the previous rate of windfall development (10dpa) and likely sites with potential (which would appear to support such an extent) and assumed a discounted rate in order to provide greater flexibility).

10. This leaves a further 60 dwellings required, which cannot be met within the existing development

boundary. Having looked at all the available options, the preferred site is land currently within the Green Belt, west of Westminster Road (policy H4). Because paragraph 136 of the NPPF states that neighbourhood plans can amend the Green Belt, but only when the “need for changes ... has been established through strategic policies”, this additional site cannot be allocated until such time as the Local Plan acknowledges the strategic need for the Green Belt to be changed. As such, it is proposed that this policy / site allocation will be added through an early review of the Neighbourhood Plan, once the revised Local Plan has been adopted.

11. Policy H5 is therefore very much dependent on the Green Belt alteration, but as per our earlier submission we would request that the exact detail of this boundary amendment should be detailed through the Neighbourhood Plan. The current differences in terms of the area to be removed are shown below (the Local Plan shading, the Neighbourhood Plan as pink diagonal hatching) – but further changes could become necessary either as a result of the Examination or in a future review of the Neighbourhood Plan.

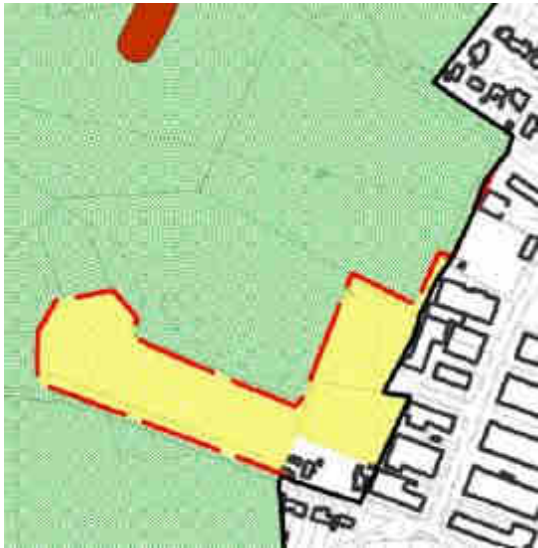
Figure 1 Local Plan policies map

Figure 2 Submission Version of Wareham NP policies map

Potential Housing Delivery		
Site	Dwellings	Notes
West of Westminster Road (H4)	60	Subject to change in Green Belt boundary in Purbeck Local Plan
Westminster Rd Industrial Estate (H5)	30	Whole site may not come forward in Plan period - assume 33% of 90 dwell.
Johns Road (H6)	15	Whole site may not come forward in Plan period - assume 50% of 30 dwell.
Hospital/Health Centre site (H8)	40	Subject to relocation of health facilities
Former Middle School site (GS2)	35	Extra care housing / keyworker housing / care home in association with proposed health hub
Cottees site (H9)	10	
Former Gasworks site (H7)	10	
Windfall	100	Assume 66% of average small sites windfall development of 10 dwellings p.a. over 2003-17
Total	300	

Table 1. Summary of Potential Housing Delivery

¹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/neighbourhood-planning-purbeck/pdfs/in-progress/wareham/submission-draft-wareham-neighbourhood-plan-2018-10-12.pdf>



12. It is also worth noting that the option for Green Belt land release consulted on in the January 2018 consultation more closely reflects that suggested in the Neighbourhood Plan (see below).

Wareham

The Wareham Neighbourhood Plan Steering Group, in consultation with local residents, is working on a neighbourhood plan for the town of Wareham.

A lot of work has been completed and the steering group is exploring options to deliver 200 new homes in addition to normal planning applications. In line with emerging Government policy, the steering group is looking first at underused brownfield land (land containing buildings or other structures) and is considering regenerating the Westminster Road and Johns Road Industrial Estates to provide new homes.

In addition, the steering group is suggesting removing land from the Green Belt boundary immediately to the west of the Westminster Road Industrial Estate (south of Bere Road and north of Carey Road). To facilitate this, Purbeck District Council would need to change its current policy that safeguards the Westminster Road and Johns Road industrial estates for employment uses and remove land from the Green Belt boundary in this area.

Local residents will be consulted about the Wareham Neighbourhood Plan in the near future.

Following this consultation, the Council will prepare a final draft plan, which is likely to be published for comments towards the end of 2018. The plan will need to be considered by an independent planning inspector before it can be adopted by the Council and used to determine planning applications.

You can view the consultation report once it is available and keep up to date with progress by visiting:

www.dorsetforyou.gov.uk/Purbeck-local-plan-review

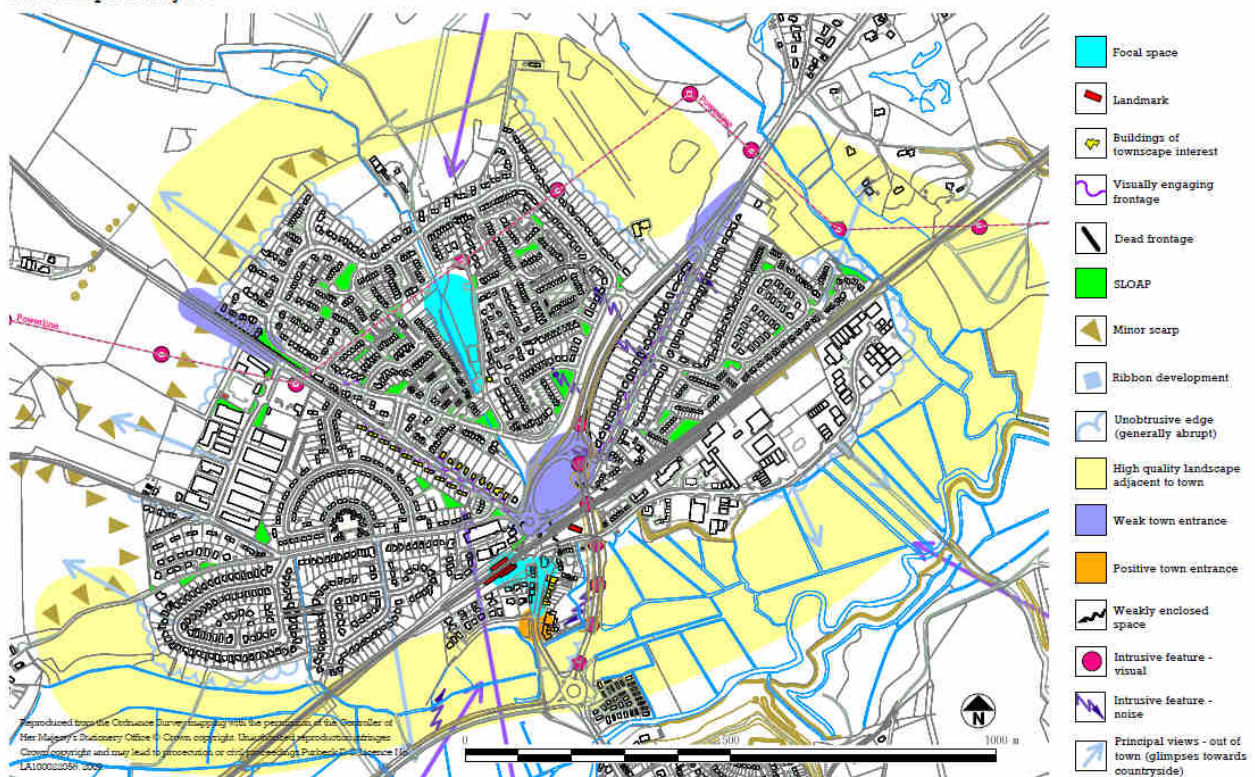


13. The Wareham Neighbourhood Plan Group are aware that representations have been made by Carter Jonas on behalf of Welbeck Land questioning the deliverability of the 300 dwellings, on the basis that the site allocations include protected employment land (even though these are no longer proposed to be protected in the revised Local Plan and were not specified as strategic policies in the adopted Local Plan) and are instead suggesting that further Green Belt releases are made to the north of Northmoor Park in order to allocate additional land within their control.
14. The Wareham Neighbourhood Plan Group disagree that an additional site allocation to the north of Northmoor Park is necessary or desirable. The reasons for this are explained in the Neighbourhood Plan (paragraphs 3.4.5 onwards) as repeated below

3.4.5 Careful consideration was given to the possible extension of Northmoor Park to the north, but this was rejected for a number of sound planning reasons set out below.

3.4.6 The townscape analysis undertaken by the Matrix Partnership (see figure 39 on page 42) identifies countryside on the northern edge of Northmoor Park as “High quality landscape adjacent to the Town” with the minor scarp where development would be more prominent coming to the edge of the estate. Development would be very visible from the Northport Greenway footpath and cycle route into Wareham Forest past Tantinoby Farm and from the Golf Course. In comparison, the countryside west of Westminster Road is not shown as high quality and the minor scarp would allow development to take place which would not intrude into views across the Town from the south.

Townscape Analysis



3.4.7 Northmoor Park is much closer to and accessible to the internationally important nature conservation sites in Wareham Forest. There is no intervening land which could be used as an effective Suitable Alternative Natural Greenspace and there is therefore a likelihood that development here would lead to increased pressure and disturbance to these important nature conservation sites. In comparison, there is sufficient suitable land to provide alternative natural greenspace directly adjoining the sites west of Westminster Road to provide a very effective alternative for dog walking, informal children’s play etc.

3.4.8 The land north of Northmoor Park includes well used allotments that are highly valued by the local community. They are secure, with low levels of theft. They are very well established and would take many years to re-establish were they to be moved. West of Westminster Road there are no such community uses.

15. It is also noted that the two options are considered in detail under the January 2019 Green Belt Study² - pages 70-71 in respect of land adjacent to Carey Road and to the west of Westminster Road Industrial Estate, and pages 72- 73 in respect of land lying immediately northwest of the Northmoor estate, north of Bere Road. The Green Belt study conclusions highlight some key differences in terms of their contribution towards meeting the purposes of the Green Belt alongside additional criteria relating to the wider function of the sites across the green belt and consideration as to whether it is possible to identify and establish permanent new green belt boundaries.

Table 1. Comparison of the sites regarding Green Belt release

Green Belt Purpose	Land west of Westminster Road Industrial Estate	Land north of Northmoor Park
Criteria 1 - To check the unrestricted sprawl of large built-up area	Performs no significant function	Performs no significant function
Criteria 2 - To prevent neighbouring settlements from merging into one another	Performs no significant function	Performs no significant function
Criteria 3 - To assist in safeguarding the countryside from encroachment	Fully satisfies	Fully satisfies
Criteria 4 - To preserve the setting and special character of historic towns	Performs no significant function	Performs no significant function
Criteria 5 - Strategic function of the green belt	Performs no significant function	Partly satisfies
Criteria 6 – New permanent boundaries	Fully satisfies	Partly satisfies

16. There are two out of the 6 criteria where the loss of Green Belt land would be a concern in respect of the preferred site to be included in the review of Neighbourhood Plan (land west of Westminster Road), and three for the site north of Northmoor Park. What this assessment omits is the final purpose of Green Belt designation – which is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. The Neighbourhood Plan is more likely to achieve this due to the synergy between that site and the regeneration of the industrial estate. A more widespread release of land, in contrast, is likely to undermine the regeneration of the site as developers will focus on the ‘easier’ greenfield options.

Appendix 1 – Wareham Neighbourhood Plan

see separate pdf

² <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/submission-documents/sd24-2019-01-09-green-belt-study.pdf>

FAO: Mrs Helen Nolan
Programme Officer
Purbeck Local Plan
Dorset Council
Westport House
Worgret Road, Wareham
BH20 4PP

7th June 2019

Your ref: Matter D: The Strategy for Development
Our ref: AB/3056

Dear Mrs Nolan

**Re: Final Written Submissions for the Purbeck Local Plan Examination
– Matter D on behalf of Westcoast (Purbeck) Ltd; Representee ref.
1191219**

The following letter has been prepared in support of our final written submissions in advance of the Purbeck Local Plan Examination hearings in July and August 2019. The representation is made on behalf of Westcoast (Purbeck) Ltd (1191219) in respect of the land within their control at Binnegar Hall, Worgret Road, East Stoke, BH20 6AT.

This letter provides comment specifically in respect of the Inspector's questions in view of the detailed response provided on behalf of our client at the previous Regulation 19 consultation stage.

Q1

We have provided representations in respect of Matter B which consider the Council's approach to housing figures. Those representations raise significant concerns with the methodology used to calculate the housing figures and identifies that the Council is not currently planning for sufficient housing delivery to meet the need as calculated in accordance with the standard methodology.

That failure of the plan to fully meet the housing need has a fundamental knock-on impact in that it means that the spatial strategy of the plan is not properly justified, effective or consistent with national policy in respect of the overall scale of development.

The representations provided in respect of Matter B identify a shortfall of some 240 dwellings against the need as calculated in accordance with the standard methodology.

Paragraph 60 of the NPPF clearly requires that, to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment which uses the standard method. The figure derived from the standard method should therefore be regarded as the starting point, with any additional development to meet needs arising in other areas being in addition.

By being based on a lower housing requirement, the spatial strategy fails to identify a suitable scale of development to meet the needs of the area going forward. It is considered that in order to be considered justified, effective and consistent with national policy the spatial strategy should be identifying a greater scale of development which is sufficient to meet the housing requirements identified in accordance with the standard methodology.

Q2

As stated in response to Question 1, above, we consider that the scale of development set out is insufficient to meet the housing needs of the area through the plan period. It would therefore fail to be effective or consistent with national policy which expects that locally arising housing needs should be met at a minimum.

The spatial strategy should be amended to ensure that it will provide sufficient housing to meet the local need identified in accordance with the standard methodology. In order to ensure that the strategy is effective the Council should look to allocate additional sites where these are available. My Client's land is suitable for housing delivery, is available and is deliverable in the short to medium term and has the potential to make a contribution of approximately 50 dwellings. It should therefore be considered for inclusion as an allocated site in addition to the other allocations already proposed.

Q3

No Comment

Q4

No comment

Q5

No Comment

Q6

No Comment.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

Direct email: adam@kppcltd.co.uk
Website: www.kenparkeplanning.com