

Comment

Agent	Mr Matt Holmes (1190857)
Email Address	[REDACTED]
Company / Organisation	Chapman Lily Planning Ltd
Address	Unit 5 Designer House Sandford Lane Wareham BH20 4DY
Consultee	(1190869)
Company / Organisation	Flowers Valley Developments Ltd
Address	c/o Chapman Lily Planning Ltd Unit 5 Designer House Wareham BH20 4DY
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Flowers Valley Developments Ltd (- 1190869)
Comment ID	PLPP213
Response Date	01/12/18 18:24
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	V1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Draft Policy V1 of the pre-submission plan is titled 'Spatial Strategy for Sustainable Communities', but its content is a summary of allocations, rather than a policy that provides a clear picture of the most sustainable locations for growth in the district. The Purbeck Local Plan Part 1 contains Policy LD (General Location of Development), which sets out clearly the district's settlement hierarchy and leaves no ambiguity as to where development will be directed (subject to environmental constraints).

Given the overarching influence a policy on a plan's spatial strategy is expected to have, Policy V1 is imprecise and an insufficient basis on which to deliver sustainable development. It takes no account of the location and role of settlements (particularly those in the northeast of the district, which also have a close relationship with the conurbation). Rather, it seems more like a policy designed to justify the proposed allocations, than a genuine spatial strategy that would deliver sustainable communities. As such, the policy should not be considered sound because it lacks an appropriate strategy.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Flowers Valley Developments Ltd recommends that a policy be introduced akin to Policy LD of the Purbeck Local Plan Part 1, making clear the district's settlement hierarchy and therefore where growth is to be focussed in line with sustainable development principles.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Mr Matt Holmes (1190857)
Email Address	[REDACTED]
Company / Organisation	Chapman Lily Planning Ltd
Address	Unit 5 Designer House Sandford Lane Wareham BH20 4DY
Consultee	(1190869)
Company / Organisation	Flowers Valley Developments Ltd
Address	c/o Chapman Lily Planning Ltd Unit 5 Designer House Wareham BH20 4DY
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Flowers Valley Developments Ltd (- 1190869)
Comment ID	PLPP214
Response Date	01/12/18 18:42
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Full representation letter
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H2
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

It is apparent from draft Policy H2 (The Housing Land Supply) that the Council's aim is to just meet the Council's own housing need, with no homes over and above the target. Flowers Valley Developments Ltd would question whether or not a target of the bare minimum is truly in the spirit of the requirement of the National Planning Policy Framework (NPPF) for '*significantly boosting the supply of homes*', but moreover, no allowance at all is made for the Duty to Cooperate (DtC). The Council's Statement of Common Ground between local planning authorities in Dorset (October 2018) makes clear at paragraph 17 the stark rise in housing need across the Eastern Dorset Housing Market Area (HMA) in the short term. The statement cites figures mooted in 2017, taken from the government's proposed standard method for housing need calculations. Back then, figures showed the HMA's need was in the region of 1,723 additional new homes per annum over and above current local plan housing targets. But less than a year on, the revised NPPF has been published, whose standard method for housing need calculations shows a worsening situation. For example, East Dorset District Council's recent local plan options consultation cited the 2017 figures of 442 homes per annum, but the government's standard method in the revised NPPF in fact revises it upwards to 490 homes per annum. This works out at nearly 1,000 additional homes over the plan period. It is also worth noting that Christchurch Borough Council acknowledged in its recent local plan options consultation that it will not be able to meet its housing needs by any stretch and will instead need to rely on its neighbours through the DtC.

Given the constrained nature of much of the HMA, it is incumbent on Purbeck District Council to work proactively to meet its neighbours' unmet needs. The lack of provision to do this within the plan as drafted makes it not sound: it is not positively prepared (*'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so'*) and not effective (*'based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred'*).

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Flowers Valley Developments Ltd recommends that Policy H2 be amended through the addition of a final paragraph stating: '*The Council will work proactively to ensure that the housing needs of both the HMA and the neighbouring HMA are met in full. Additional land may therefore be released to meet these needs*'.

If you have any supporting documents please upload them here.

[Full representation letter](#)
Full representation letter

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

Chapman Lily Planning Ltd
 Unit 5 Designer House
 Sandford Lane
 Wareham
 BH20 4DY

Date: 29/11/18
 Your reference: Local Plan Review Pre-submission
 Our reference: MH-1201

M: [REDACTED]
 T: [REDACTED]
 E: [REDACTED]
 W: www.clplanning.co.uk

Dear Sir or Madam,

Re: Purbeck Local Plan pre-submission draft consultation

On behalf of my client, Flowers Valley Developments Ltd, I herein provide a response to the Purbeck Local Plan pre-submission draft document.

I note that the Council's timetable envisages submitting the plan for examination in February / March 2019. In accordance with annex 1 of the revised National Planning Policy Framework (NPPF), the plan will therefore be examined in the context of the revised NPPF, rather than its predecessor.

As the Council is undertaking a Regulation 19 consultation, Flowers Valley Developments Ltd's response focuses on the soundness of the plan. The tests of soundness are set out in paragraph 35 of the revised NPPF as follows:

- 'a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework'.*

Flowers Valley Developments Ltd's response is structured as follows:

- The approach to the spatial strategy
- Housing need
- Housing land supply
- Green belt
- Omission site at Castle Farm Road, Lytchett Matravers

THE APPROACH TO THE SPATIAL STRATEGY

Draft Policy V1 of the pre-submission plan is titled 'Spatial Strategy for Sustainable Communities', but its content is a summary of allocations, rather than a policy that provides a clear picture of the most sustainable locations for growth in the district. The Purbeck Local Plan Part 1 contains Policy LD (General Location of Development), which sets out clearly the district's settlement hierarchy and leaves no ambiguity as to where development will be directed (subject to environmental constraints).

Given the overarching influence a policy on a plan's spatial strategy is expected to have, my client finds draft Policy V1 to be imprecise and an insufficient basis on which to deliver sustainable development. It takes no account of the location and role of settlements (particularly those in the northeast of the district, which also have a close relationship with the conurbation). Rather, it seems more like a policy designed to justify the proposed allocations, than a genuine spatial strategy that would deliver sustainable communities. As such, the policy should not be considered sound because it lacks an appropriate strategy.

Recommendation

Flowers Valley Developments Ltd recommends that a policy be introduced akin to Policy LD of the Purbeck Local Plan Part 1, making clear the district's settlement hierarchy and therefore where growth is to be focussed in line with sustainable development principles.

HOUSING NEED

It is clear from draft Policy H2 (The Housing Land Supply) that the Council's aim is to just meet the Council's own housing need, with not one single home over and above the target. Flowers Valley Developments Ltd would question whether or not a target of the bare minimum is truly in the spirit of the requirement of the National Planning Policy Framework (NPPF) for '*significantly boosting the supply of homes*', but moreover, no allowance at all is made for the Duty to Cooperate (DtC). The Council's Statement of Common Ground between local planning authorities in Dorset (October 2018) makes clear at paragraph 17 the stark rise in housing need across the Eastern Dorset Housing Market Area (HMA) in the short term. The statement cites figures mooted in 2017, taken from the government's proposed standard method for housing need calculations. Back then, figures showed the HMA's need was in the region of 1,723 additional new homes per annum over and above current local plan housing targets. But less than a year on, the revised NPPF has been published, whose standard method for housing need calculations shows a worsening situation. For example, East Dorset

District Council's recent local plan options consultation cited the 2017 figures of 442 homes per annum, but the government's standard method in the revised NPPF in fact revises it upwards to 490 homes per annum. This works out at nearly 1,000 additional homes over the plan period. It is also worth noting that Christchurch Borough Council openly acknowledged in its recent local plan options consultation that it will not be able to meet its housing needs by any stretch and will instead need to rely on its neighbours through the DtC.

Given the constrained nature of much of the HMA, it is incumbent on Purbeck District Council to work proactively to meet its neighbours' unmet needs. The lack of provision to do this within the plan as drafted makes it not sound: it is not positively prepared (*'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so'*) and not effective (*'based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred'*).

Recommendation

Flowers Valley Developments Ltd recommends that Policy H2 be amended through the addition of a final paragraph stating: *'The Council will work proactively to ensure that the housing needs of both the HMA and the neighbouring HMA are met in full. Additional land may therefore be released to meet these needs'*.

HOUSING LAND SUPPLY

My clients note how development is not being spread very evenly across the district and certainly not in a proportionate manner, with settlements such as Moreton due to expand disproportionately whilst large villages such as Lytchett Matravers are due to receive limited growth.

Although Lytchett Matravers is constrained by green belt, paragraph 138 of the NPPF is clear about the onus on councils to *'promote sustainable development... [and] consider the consequences for sustainable development of channelling development... towards the outer green belt boundary'*. Whilst the pre-submission plan shows the Council is clearly amenable to growth at Lytchett Matravers, the quantum proposed to be allocated there is nowhere near sufficient. Given the size of the village; its lack of absolute planning constraints; its very high level of sustainability; and its relationship with the conurbation, it should be the key focus for development in the district.

Land at Castle Farm Road, Lytchett Matravers has previously been promoted to the Council through the Strategic Housing Land Availability Assessment (SHLAA), with my clients noting that it was formerly an included site (ref. 6/14/0279). However, the site is featured nowhere in the October 2018 SHLAA update. My client has not withdrawn their site from the SHLAA and is therefore disappointed to note that it has not been duly considered. Indeed, they confirmed its availability during the 2018 'New Homes for Purbeck' consultation. The knock-on from the site not being considered through the SHLAA

is that its merits have not been considered through other evidence studies nor the Sustainability Appraisal process.

Consequently, Flowers Valley Developments Ltd believes that the SHLAA is flawed and their land has not been appropriately considered as a reasonable alternative. It therefore follows that the plan is not sound because it is not justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence).

Recommendation

Flowers Valley Developments Ltd believes that land at Castle Farm Road should be reconsidered by the Council and allocated. As set out below, the site is unconstrained and would be an excellent prospect, located in a central position on the edge of the village.

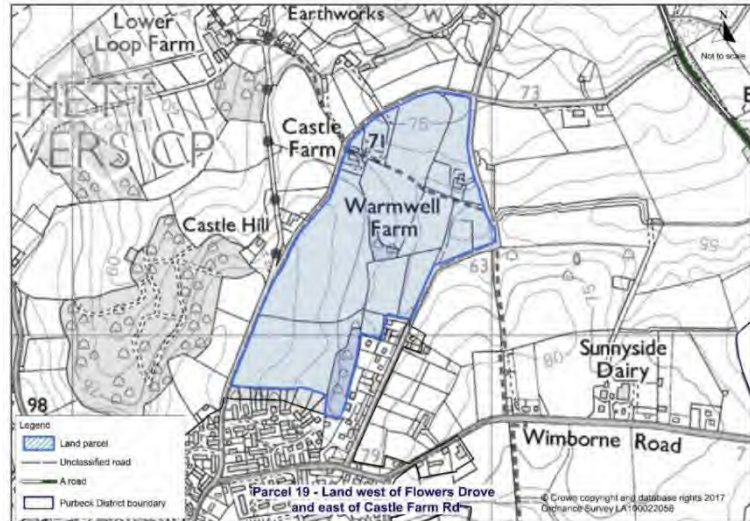
GREEN BELT

The Council will be aware of the requirement of paragraph 139 of the NPPF to '*where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period*'. My client notes that there is no consideration of de-allocating land in the green belt ('white land') in either the October 2018 Green Belt Study or the draft plan itself. This repeats the approach of the PLP1, which also ignored the requirement and was noted by the inspector at the time as inappropriate (see paragraph 21 of his report).

It is also important to bear in mind that the NPPF requires councils to review their local plans in whole or in part every five years. In the interests of meeting future needs, it is vital that the Council releases the green belt designation from sites on the edges of sustainable settlements, such as Lytchett Matravers, for example. This will allow more flexibility to adapt rapidly to changing circumstances, including meeting wider needs through the DtC.

The fact that no consideration appears to be given to identifying white land shows that the Council has not had due regard to the NPPF's requirements and therefore, the Council's approach to green belt should not be considered sound.

Looking closely at the Council's Green Belt Study, Flowers Valley Developments Ltd is very concerned as to how the Council has applied the green belt review in formulating development options. The study has taken a very broad-brush approach by assessing large land parcels. Looking at parcel 19 (Land West of Flowers Drive and East of Castle Farm Road), for example, this parcel encapsulates a large tract of land and the study concludes that there would be green belt harm from development here. It is perfectly true that development towards the far north of the parcel would harm the purposes of the green belt, but the same surely cannot be true of that to the south, which would clearly relate well to existing built form and would be enclosed by strong field boundaries and a road. It is therefore wholly inappropriate to conclude that this parcel of land would fail the purposes of the green belt, when the assessment is of such a significant land parcel. A more nuanced approach would be much more appropriate.



Recommendation

As set out above, my client's land has been erroneously omitted from the SHLAA. It should be considered and an appropriate analysis of it should be carried out in the Green Belt Study. The site should be allocated for development, or at the very least, released from the green belt in order to provide the Council with greater long-term flexibility to meet future needs, including through the Duty to Cooperate.

OMISSION SITE AT CASTLE FARM ROAD, LYTCHETT MATRAVERS

Flowers Valley Developments Ltd controls land at Castle Farm Road, Lytchett Matravers, identified on the map below.



As can be seen, this 3.6 ha site is located close to the core of the village and is enclosed by strong and defensible boundaries in the form of a road and established planting. Development would be enclosed, relating well to the built form to the south and east and the allotments to the west, offering the opportunity to create a strong settlement edge. This discrete parcel of land could be developed successfully without any harm to the purposes of the green belt or landscape character and is of a quantum that could deliver benefits – not just much-needed affordable housing, but other benefits such as equipped play space.

Within comfortable walking distance are an employment site, comparison retail, a hairdresser, doctor's surgery, public open space, bus stops, the library, village hall, pubs and a primary school. Additional employment is within easy reach at Holton Heath, access to which would have minimum impacts on the A351 and A35. My clients note the very close proximity of the SANG proposed to come forward to the north of the village, finding it considerably closer to their site than some of the proposed allocations in the village. This well-placed SANG could help mitigate the impacts of the site.

CONCLUSIONS

This representation has set out a compelling case for the allocation of 3.6 ha of land at Castle Farm Road in Lytchett Matravers for housing. It is unconstrained, strategically well placed, available and deliverable now. Its allocation would enable development at one of the district's largest settlements and, in line with paragraph 138 of the NPPF, promote a much more sustainable pattern of growth than sites beyond the green belt boundary. It is abundantly clear that the HMA will not be able to meet its own housing needs without engaging the Duty to Cooperate and therefore opportunities to develop such sustainable sites as my client's ought to be seized.

As set out above, the site should have been considered by the Council through the SHLAA because my client confirmed its availability during the 2018 New Homes for Purbeck consultation. If it had been, its lack of constraints and high sustainability credentials puts it in no doubt that the site would have continued to be identified as included in the SHLAA. It would have also scored very highly in the Sustainability Appraisal, making it a clear reasonable alternative for a growth option. My clients argue that the Council's failure to afford the site due consideration makes the plan's strategy not sound.

Flowers Valley Developments Ltd would be happy to engage positively with Purbeck District Council to rectify the problem and bring forward land at Castle Farm Road in a timely manner. We look forward to a positive dialogue.

Yours faithfully,

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

Matt Holmes BA (Hons) MA MRTPI, **Director**

Comment

Consultee	Mr Patrick Foster (1190828)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Patrick Foster (1190828)
Comment ID	PLPP178
Response Date	30/11/18 18:36
Consultation Point	Chapter 2: Vision and objectives (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 2: Vision and objectives Infrastructure Sec 35 – 36
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

“Purbeck is within easy reach of the Poole and Bournemouth conurbation mainly via the A351 / A35 roads and the chain ferry across Poole Harbour. Many Purbeck residents look to the conurbation for work and shopping facilities and many conurbation residents come to Purbeck for outdoor leisure activities. Transport links can get congested, particularly in the peak tourism season”

The plan should be challenged because it fails to offer any definitive guarantees in terms of infrastructure that will be required to support the number of houses being proposed for Wool (which does not include any 'add-ons' that could well appear on 'smaller sites'). The plan merely assumes that the current schools can be adequately expanded; no mention is made of the ability (or otherwise) to expand the already overloaded sewage works; whilst there is at least acknowledgement that there will be increased traffic, noting previous surveys and pressure on the level crossing given that many new residents will commute to the Poole/Bournemouth conurbation, the only mitigation suggested is to encourage motorists to seek alternative routes

470 Homes is likely to increase local traffic by at least 200 Vehicles including both

Private cars and business related vehicles (See Purbeck Gate the last large development and the parking issues that already exist there). Site was over developed with insufficient account of vehicle requirements which has led to dangerous parking, blocking of access for both Emergency Vehicles and Utilities including Rubbish collection.

The Level crossing which is on the main arterial route through the village (A352) currently

closes 4 times per hour for an average of between 5 and 8 mins this leads the Traffic at peak times to back up beyond the Wool / Bovington roundabout a distance of approx. ½ a mile and the same on the village side of crossing. There are no viable alternative routes other

Comment

Consultee	Mr Patrick Foster (1190828)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Patrick Foster (1190828)
Comment ID	PLPP180
Response Date	30/11/18 18:46
Consultation Point	Chapter 2: Vision and objectives (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4: Housing Sub Section 127

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The previous review for a Local Plan for Purbeck 2016 suggested 1000 homes for Wool area

The current revised plan has reduced this to 470

What was the formula/Criteria used for the original estimate?

Who sets this Criteria? Has the criteria /Formula been amended?

If this is following National Housing Guidelines I would argue that this lacks knowledge of local Areas, neighbourhoods, population needs etc. and revised figures could therefore still be inaccurate.

If the original estimate was flawed which seems to be the case! how can we as local residents understand where the current figures are drawn from?

Unless details of how this figure of 470 was arrived at is published and available to residents

then how can we make subjective comments as to their accuracy?

This Plan is unsound as it perpetuates the myth that building 470 homes in Wool will somehow provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely affordable (for rent or purchase) a house needs to cost £150,000.

Therefore we have not been provided with evidence to show this plan has been positively prepared and therefore cannot be justified or effective or may not even be consistent with meeting the Genuine local housing needs over the next 15 years or indeed National Housing guidelines.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Justify the figures show calculations explain why figure amended from 1000 to 470

Comment

Consultee	Mr Patrick Foster (1190828)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Patrick Foster (1190828)
Comment ID	PLPP183
Response Date	30/11/18 19:24
Consultation Point	Wool - 470 homes, 65 bed care home, SANG, community hub and recreational space (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing Wool 470 Homes
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

No explanation of how figure of 470 calculated. previous 2016 plan was for 1000 Homes , No justification or evidence provided for 470 . Majority of proposed sites are all going to

feed Traffic on to same part of main road A352 leading to increased congestion , increased pollution , increased likelihood of Traffic related incidents with Road Safety implications

Wool is a village any development on this scale is going to completely destroy the character of the Village. We have already been blessed with a completely overengineered Railway Bridge, overengineered safety barriers , an under utilised Cycleway with a ridiculous layout that comprises Road Safety. The plan also seeks to destroy the local green spaces that exist between Wool and East Burton thereby destroying the identities of the 2 communities. Despite all the language in the report it will not deliver Good Quality, sustainable , affordable housing for the local community if the last large development is anything to go by.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

It is lacks any Evidence of true need.

It fails to address

the Infrastructure Improvements that would need to support development.

It fails to deal with Road structure other than make spurious

references to improvements in 'Alternative' means of Transport

It fails

to take account of local communities views

Comment

Consultee	Mr Patrick Foster (1190828)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Patrick Foster (1190828)
Comment ID	PLPP215
Response Date	01/12/18 18:43
Consultation Point	Policy IM1: Tools for delivery - the Purbeck Local Plan implementation strategy (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 7: Implementation, delivery and monitoring
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Dorset is just about to undergo a major change in Local Government organisation and the country is facing the yet unknown outcomes of Brexit which may in the short term have a major impact on spending

there is already comments being made nationally about House prices and therefore this could have an impact on future investments including Building and development. The local plan has been evolving over the last few years and I can understand the need to plan ahead. However with the disbanding of local councils including Purbeck District Council and the formation of two new Unitary authorities I believe that the current Local Plan for Purbeck should be put on hold and all details , reviews studies ,comments etc handed over to the new Dorset Council in Apr 2019. They will have to undertake major reviews across the whole County review their spending priorities and best decide how funding from local resources (Council tax etc) and funding from central government is best utilised therefore to put forward a plan now which may not be deliverable seems non-sensical. Furthermore I believe some developers are already sitting on plots of land which as yet have not got of the ground and I believe where planning has already been granted developers are encouraged to complete all these projects before new ones are granted even if financially they are not so beneficial to the developers. I also believe we have opportunities to resolve and utilise areas of underutilised current brownfield sites before destroying more of our green and pleasant land

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Local plan should include all existing planning for housing that has been approved including timetable for completion and current plans should be suspended until after Apr 2019 for consideration etc as part of reviews that will be undertaken by the new local authority who will be the legal entity responsible for future development in the County.

Comment

Consultee Mr Patrick Foster (1190828)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Mr Patrick Foster (1190828)
Comment ID PLPP692
Response Date 30/11/18 19:24
Consultation Point Policy H5: Wool ([View](#))
Status Processed
Submission Type Web
Version 0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing Wool 470 Homes

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

No explanation of how figure of 470 calculated. previous 2016 plan was for 1000 Homes , No justification or evidence provided for 470 . Majority of proposed sites are all going to feed Traffic on to same part of main road A352 leading to increased congestion , increased pollution , increased likelihood of Traffic related incidents with Road Safety implications

Wool is a village any development on this scale is going to completely destroy the character of the Village. We have already been blessed with a completely overengineered Railway Bridge, overengineered safety barriers , an under utilised Cycleway with a ridiculous layout that comprises Road Safety. The plan also seeks to destroy the local green spaces that exist between Wool and East Burton thereby destroying the identities of the 2 communities. Despite all the language in the report it will not deliver Good Quality, sustainable , affordable housing for the local community if the last large development is anything to go by.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

It lacks any Evidence of true need.

It fails to address

the Infrastructure Improvements that would need to support development.

It fails to deal with Road structure other than make spurious

references to improvements in 'Alternative' means of Transport

It fails

to take account of local communities views

Comment

Consultee Mr Patrick Foster (1190828)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Mr Patrick Foster (1190828)
Comment ID PLPP693
Response Date 30/11/18 19:24
Consultation Point Policy H5: Wool ([View](#))
Status Processed
Submission Type Web
Version 0.2

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing Wool 470 Homes

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

No explanation of how figure of 470 calculated. previous 2016 plan was for 1000 Homes , No justification or evidence provided for 470 . Majority of proposed sites are all going to feed Traffic on to same part of main road A352 leading to increased congestion , increased pollution , increased likelihood of Traffic related incidents with Road Safety implications

Wool is a village any development on this scale is going to completely destroy the character of the Village. We have already been blessed with a completely overengineered Railway Bridge, overengineered safety barriers , an under utilised Cycleway with a ridiculous layout that comprises Road Safety. The plan also seeks to destroy the local green spaces that exist between Wool and East Burton thereby destroying the identities of the 2 communities. Despite all the language in the report it will not deliver Good Quality, sustainable , affordable housing for the local community if the last large development is anything to go by.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

It lacks any Evidence of true need.

It fails to address

the Infrastructure Improvements that would need to support development.

It fails to deal with Road structure other than make spurious

references to improvements in 'Alternative' means of Transport

It fails

to take account of local communities views

Comment

Consultee	Mr Patrick Foster (1190828)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Patrick Foster (1190828)
Comment ID	PLPP695
Response Date	30/11/18 18:36
Consultation Point	Policy I2: Improving accessibility and transport (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 2: Vision and objectives Infrastructure Sec 35 – 36
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested

revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

“Purbeck is within easy reach of the Poole and Bournemouth conurbation mainly via the A351 / A35 roads and the chain ferry across Poole Harbour. Many Purbeck residents look to the conurbation for work and shopping facilities and many conurbation residents come to Purbeck for outdoor leisure activities. Transport links can get congested, particularly in the peak tourism season”

The plan should be challenged because it fails to offer any definitive guarantees in terms of infrastructure that will be required to support the number of houses being proposed for Wool (which does not include any 'add-ons' that could well appear on 'smaller sites'). The plan merely assumes that the current schools can be adequately expanded; no mention is made of the ability (or otherwise) to expand the already overloaded sewage works; whilst there is at least acknowledgement that there will be increased traffic, noting previous surveys and pressure on the level crossing given that many new residents will commute to the Poole/Bournemouth conurbation, the only mitigation suggested is to encourage motorists to seek alternative routes

470 Homes is likely to increase local traffic by at least 200 Vehicles including both

Private cars and business related vehicles (See Purbeck Gate the last large development and the parking issues that already exist there). Site was over developed with insufficient account of vehicle requirements which has led to dangerous parking, blocking of access for both Emergency Vehicles and Utilities including Rubbish collection.

The Level crossing which is on the main arterial route through the village (A352) currently

closes 4 times per hour for an average of between 5 and 8 mins this leads the Traffic at peak times to back up beyond the Wool / Bovington roundabout a distance of approx. ½ a mile and the same on the village side of crossing. There are no viable alternative routes other

Comment

Consultee	Mr Patrick Foster (1190828)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Patrick Foster (1190828)
Comment ID	PLPP696
Response Date	30/11/18 18:36
Consultation Point	Chapter 6: Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 2: Vision and objectives Infrastructure Sec 35 – 36
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

“Purbeck is within easy reach of the Poole and Bournemouth conurbation mainly via the A351 / A35 roads and the chain ferry across Poole Harbour. Many Purbeck residents look to the conurbation for work and shopping facilities and many conurbation residents come to Purbeck for outdoor leisure activities. Transport links can get congested, particularly in the peak tourism season”

The plan should be challenged because it fails to offer any definitive guarantees in terms of infrastructure that will be required to support the number of houses being proposed for Wool (which does not include any 'add-ons' that could well appear on 'smaller sites'). The plan merely assumes that the current schools can be adequately expanded; no mention is made of the ability (or otherwise) to expand the already overloaded sewage works; whilst there is at least acknowledgement that there will be increased traffic, noting previous surveys and pressure on the level crossing given that many new residents will commute to the Poole/Bournemouth conurbation, the only mitigation suggested is to encourage motorists to seek alternative routes

470 Homes is likely to increase local traffic by at least 200 Vehicles including both

Private cars and business related vehicles (See Purbeck Gate the last large development and the parking issues that already exist there). Site was over developed with insufficient account of vehicle requirements which has led to dangerous parking, blocking of access for both Emergency Vehicles and Utilities including Rubbish collection.

The Level crossing which is on the main arterial route through the village (A352) currently

closes 4 times per hour for an average of between 5 and 8 mins this leads the Traffic at peak times to back up beyond the Wool / Bovington roundabout a distance of approx. ½ a mile and the same on the village side of crossing. There are no viable alternative routes other

Comment

Consultee Mr Patrick Foster (1190828)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Mr Patrick Foster (1190828)
Comment ID PLPP697
Response Date 30/11/18 19:24
Consultation Point Policy H5: Wool ([View](#))
Status Processed
Submission Type Web
Version 0.2

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing Wool 470 Homes

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

No explanation of how figure of 470 calculated. previous 2016 plan was for 1000 Homes , No justification or evidence provided for 470 . Majority of proposed sites are all going to feed Traffic on to same part of main road A352 leading to increased congestion , increased pollution , increased likelihood of Traffic related incidents with Road Safety implications

Wool is a village any development on this scale is going to completely destroy the character of the Village. We have already been blessed with a completely overengineered Railway Bridge, overengineered safety barriers , an under utilised Cycleway with a ridiculous layout that comprises Road Safety. The plan also seeks to destroy the local green spaces that exist between Wool and East Burton thereby destroying the identities of the 2 communities. Despite all the language in the report it will not deliver Good Quality, sustainable , affordable housing for the local community if the last large development is anything to go by.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

It lacks any Evidence of true need.

It fails to address

the Infrastructure Improvements that would need to support development.

It fails to deal with Road structure other than make spurious

references to improvements in 'Alternative' means of Transport

It fails

to take account of local communities views

Comment

Consultee	Mr Patrick Foster (1190828)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Patrick Foster (1190828)
Comment ID	PLPP177
Response Date	30/11/18 18:32
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 1 Introduction para 3

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

- The Purbeck Local Plan is supported by a number of supplementary planning documents (SPDs) available on the Council's website.

Despite extensive searching of Council Website (Part of Dorset for You) either by scrolling through many sections and trying a variety of Search criteria we were unable to locate or access any of these (SPDs) They appear to have been buried deeply away therefore making them in accessible. They should all be part of Plan so visible and easy to view.

This plan therefore can not be Justified as it does not provide supporting information or proportional evidence to support the plan so cannot be considered to have been positively prepared

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

All SPD's should be annexed to Pre-Submission Plan

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Ms Hester Fox-Adams (1190852)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Hester Fox-Adams (1190852)
Comment ID	PLPP187
Response Date	01/12/18 10:45
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H8

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

For the following reasons I wish to object to the **soundness** of the Purbeck Local Plan, specifically in relation to the identification and allocation in the SHLAA of proposed small sites in West Lulworth, especially those three sites identified adjacent to Sunnyside and Bindon Road.

Reason 1

The content of the Plan (namely Policies H2 and H8) does not provide sufficient protection to the character of West Lulworth village.

Policy H2 confirms that “*small sites next to existing settlements and windfall sites within existing settlements (excluding Wareham) will provide 933 homes within the Plan period*”. However, taking account the fact that some of the sites within the SHLAA will not be deliverable, this policy is not capable of delivering the required 933 homes. This is a valid reason for objecting to the Plan at this stage.

Paragraph 118 of the Plan states “*the impacts of development on these sites varies according to the nature, scale, characteristics and surroundings of individual sites*”. An analysis of the sites within West Lulworth, identified within the SHLAA as being **suitable** for development, indicates that when assessed against the criteria in Policy H8 (especially criteria a and b), some of these sites are not suitable due to the adverse impact of their development on the nature, scale, characteristics and surroundings.

Policy H8: ‘Small sites next to existing settlements’ sets the policy for any planning applications for housing within West Lulworth.

“Applications for small sites will be permitted where adjacent to existing homes in the closest town or village (as defined in the settlement hierarchy in the glossary of this plan), and not appear isolated in the countryside, provided the following apply:

- 1 *the scale of proposed development is proportionate to the size and character of the existing settlement, up to a maximum of 30 homes;*
- 2 *individually and cumulatively, the size, appearance and layout of proposed homes must not harm the character and value of any landscape or settlements potentially affected by the proposals; and*
- 3 *the development would contribute to the provision of a mix of different types and sizes of homes to reflect the Council's expectations in Policy H9 or, where expressed in a neighbourhood plan, those of the relevant local community”.*

Whilst it is recognised that any development proposals for these sites will be tested through planning applications it is suggested that the Plan, as currently worded (and without a proposals map for West Lulworth) is not sound as it does not provide sufficient protection to the character of West Lulworth village. **Specifically the proposed scale of the three sites on Sunnyside and Bindon Road would significantly harm the character and value of the landscape of Bindon Hill, whose landscape provides and frames the rural setting on all approaches to the village.**

I would request that the Inspector requires an inset map of the village to be inserted into the Local Plan, which robustly protects: the character of the existing village; the unique landscape of the village; and the amenity of existing properties. **In the absence of this the Plan cannot be said to be sound.**

Reason 2

The Plan is not sound as the evidence base (namely the SHLAA) is not sufficiently robust to deliver the housing numbers set out in Policy H2.

The Strategic Housing Land Availability Assessment (SHLAA) 2018 underpins the approach to delivering the required housing across the district in the plan period. By indicating those sites which are ‘suitable’ and those which are ‘unsuitable’ for consideration the SHLAA identifies and assesses the potential for development at specific sites.

The conclusion to the site (SHLAA/0065) - land to the east of Farm Lane and Shepherds Way, is that it is “*unsuitable because of potential adverse impact on the Dorset Area of Outstanding Natural Beauty (AONB) and because not clear how adverse effects on European sites could be avoided or mitigated*”. An assessment of the additional small sites within or adjacent to West Lulworth should also be drawn that they are unsuitable for the same reasons, **especially the three proposed sites on the slopes of Bindon Hill on Sunnyside and Bindon Road.**

The SHLAA process has not been carried out sufficiently thoroughly for the small sites within West Lulworth. Some of the proposed sites are unsuitable for development because of the adverse impact on the surrounding village character; on the setting of the AONB; and because the necessary infrastructure improvements to allow them to be developed would have an adverse impact on the

special character of the village. An example of this is that private roads, **especially those of Sunnyside and Bindon Road** which would be necessary to service some of these developments, are not capable of being upgraded, and any such upgrades would harm the character of the village.

Within the SHLAA 31 small sites are assessed as being able to provide 446 homes. The assessment in this section is guided by Policy H8: Small sites next to existing settlements. The first criteria of the policy is the key test in order to ascertain if the site is adjacent to existing dwellings in the closest town or village and if the proposed capacity is suitable for the location.

Small sites assessed as currently being suitable development within West Lulworth are:

- 1 18 units adjacent adjacent to Limberlost, Sunnyside, West Lulworth
- 2 18 units adjacent to the Lilacs, West Road, West Lulworth
- 3 17 units at Allotment Gardens, Bindon Road, West Lulworth
- 4 20 units opposite Wilton Cottage, West Lulworth
- 5 11 units adjacent to the Hall, Church Road, West Lulworth
- 6 9 units on land adjacent to 1 Church Road, West Lulworth
- 7 6 units on land adjacent to Hillside House, School Lane, West Lulworth
- 8 9 units adjacent to Cove House, Bindon Road, West Lulworth

Many of the sites put forward and assessed in the SHLAA within West Lulworth should not have passed the first test and should also have already been discounted due to their development having an adverse impact on the special character of the village within the AONB. **In my opinion this is clearly the case with the three proposed sites adjacent to Sunnyside and Bindon Road. Therefore (using the SHLAA methodology) they should have been classified as unsuitable for development in the SHLAA.**

Therefore it can be concluded that the SHLAA cannot be relied upon as an accurate assessment of the development capacity within West Lulworth to contribute to the housing growth across the district. **For this reason the Plan is not 'sound'.**

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The three small sites in Sunnyside and Bindon Road, West Lulworth, should be ruled out due to their lack of suitability against Paragraph 118 of the Plan, and Policy H8 b, and should not have been included in the SHLAA.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr David Gardiner (1190913)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr David Gardiner (1190913)
Comment ID	PLPP265
Response Date	02/12/18 20:33
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H5

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I am not a legal expert. It would have been helpful to have a 'Don't know' box in the questions above.

1 On reading the Purbeck Local Plan Pre-Submission Draft Document I consider it to be vague, full of waffle and lacking in clarity. Developers are expected to make a number of improvements. The phrase 'expected to' appears 5 times in Policy H5. This does not give the reader much confidence in the outcome; developers should be 'required to' make improvements otherwise nothing will happen as they will try and do the least possible for the maximum possible gain!

1 I can see little evidence in the document to support the Housing Objectives, namely

- 1 Support sustainable community growth to provide for the needs of local residents.
- 2 Provide a mix of housing, including affordable that meets the needs of local people and is supported by appropriate infrastructure including education and healthcare.

1 On the 'Dorset for You' web site:

<https://www.dorsetforyou.gov.uk/your-community/statistics-and-census.aspx>

It states that "Dorset has a lower birth rate than Bournemouth, Poole and England & Wales, but a higher death rate. This means that without migration into the area, the population would decline".

Also, on the same web site under the title 'Area Profile for Wool' it states that in 2016 the birth rate in Wool was down 3.6% and death rate was up 7.1%. These statistics hardly support the requirement for additional housing to meet the needs of local people, quite the opposite.

1 The need for 470 houses in Wool has not been established (see paragraph above), there is certainly not the local need, furthermore, there appears to be no definitive plan to provide appropriate infrastructure to support such an increase. 60% of the respondents from Wool to the earlier Consultation did not support this proposal. In addition, there is no guarantee that Wool's total will not increase further under the '933 small sites' proposal. The need for affordable homes has been identified but there are no firm proposals as to how this will be achieved. The average house price in Purbeck is £250,000 which is 17 times the average salary in the area.

1 With an addition of 470 homes the population of Wool is likely to increase by 1000, furthermore a recommendation for a 65 bed care home has suddenly appeared in the Document. The estimated population of Wool and East Burton on 30 June 2017 was 2,934 therefore under this proposal the size of the village will increase by just over a third. This increase will put an intolerable strain on the current village infrastructure, the village GP surgery is already overloaded and short staffed, the roads are already very busy, with the railway crossing adding further to the congestion, and local public transport continues to diminish. To 'encourage' road users to use alternative routes and to work with local transport providers to improve public transport seems wishful thinking; why has this not already been done to alleviate the current situation?

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Keith Gibson Keith Gibson (1188365)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Keith Gibson Keith Gibson (1188365)
Comment ID	PLPP13
Response Date	18/11/18 08:18
Consultation Point	Moreton Station / Redbridge Pit - 490 homes, 65 bed care home and SANG (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Moreton Stn / Redbridge Pit

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I'm not legally qualified to know if it is legally compliant or not. Therefore, given only a choice of "Yes" or "No" I must default to "No". The same applies to my knowledge of your duty to cooperate.

The plan is not sound because the assumptions it is based on (the SHMA) are derived from extrapolations of past population growth. Much of this is due to UK residents moving in to enjoy the benefits of Dorset because houses have been built to enable them to do that. That might have been OK in the past but now the region is bursting.

Also the plan is not sound because it is too vague. E.g. it glibly states that the medical needs can be met by an extension to the existing surgery. So that's that problem dealt with - now, what's next? It says that school will have to be extended. Great, another problem solved. Financing is glossed over by mentioning 106 monies from developers. Brill, that can go in the "Sorted" file as well. There is nothing about how increase in traffic from residents will be dealt with, nor social care, secondary schooling, etc., etc.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

To make the plan sound the population growth must be recalculated by stripping out the effect of extrapolating Census figures for recent past immigration into the region (except for local employment) and assessing the effect of realistic assumptions of local employment opportunities (excluding the Bournemouth/Poole/Christchurch conurbation as mass commuting to that region is not practical due to road pinch points and the inflexibility of trains).

Also to make it sound more thought must be given to infrastructure improvements. More definition and precision on what is needed (including the effects of other proposals for Crossways) and how it will be funded is required.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Donald Gilder (1191470)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Donald Gilder (1191470)
Comment ID	PLPP576, PLPP698, PLPP699

Files	H5-Gilder-PLPP576-redacted.pdf
--------------	--



For Office Use Only

Requester ID: 046
 Consultee ID: 1191470
 Comment ID's: PLPPS76

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	H5
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|
| • Legally compliant | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| • Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

(Please continue on a separate sheet if necessary)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

Affordable Homes

It appears impossible to provide such homes under this plan i.e. TRULY affordable.

Numbers

More clarification on the impact of SMALL SITES is required.

Infrastructure

Infrastructure requirements must be guaranteed for all aspects of the plan, this does not appear the case at present.

Health Care / Other Addition

The proposed Care Home appeared "out of the blue" the impact of this requires careful consideration. Are there other additions that we are unaware of?

Consultation

60% of local respondents to this plan (option A) opposed it, this must be a prime consideration.

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

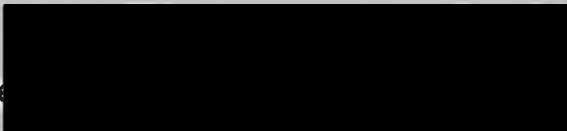
Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:  Date: 1/12/2018

Comment

Consultee	Diana Gilder (1191472)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Diana Gilder (1191472)
Comment ID	PLPP577
Response Date	03/12/18 15:04
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Letter
Version	0.3
Files	H5-Gilder-PLPP577-redacted.pdf

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H5

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?

No



For Office Use Only

Requester ID: 043
 Consultee ID: 1191472
 Comment ID's: PLPP577

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	HS
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|
| • Legally compliant | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| • Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

- ① WOOL VILLAGE IS ALREADY CHOKED WITH TRAFFIC ESPECIALLY AT THE LEVEL CROSSING. DURING THE SUMMER MONTHS IT IS MUCH WORSE. WHAT ARRANGEMENTS ARE BEING MADE FOR THESE SO CALLED ALTERNATIVE ROUTES?
- ② WHAT PERCENTAGE OF THESE NEW HOMES ARE REALLY AFFORDABLE FOR LOCAL PEOPLE? VERY FEW I SUSPECT.
- ③ THE DOCTORS, NURSES + SURGERY STAFF ARE ALREADY AT BREAKING POINT HOW COULD THEY POSSIBLY ~~COPE~~ COPE WITH AN EXTRA 65 BED CARE HOME? OR IS IT GOING TO BE PRIVATELY FUNDED?
- ④ OVERALL IT IS GENERALLY AGREED BY THE RESIDENTS OF WOOL THAT THE PROPOSALS IN THIS PLAN ARE EXCESSIVE AND UNNECESSARY.

(Please continue on a separate sheet if necessary)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

CONSIDERABLY REDUCE THE SCOPE OF THE PLAN
TO BE MORE IN LINE WITH ACTUAL DEMAND FOR
HOUSING.

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:

[Redacted Signature]

Date: 1. 12. 2018.

Comment

Consultee	Dr Ralph Gregory (1190539)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Ralph Gregory (1190539)
Comment ID	PLPP263
Response Date	02/12/18 20:02
Consultation Point	The green belt (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	V2
--	----

Do you consider that the Local Plan is legally compliant?	Yes
--	-----

Do you consider that the Local Plan is sound?	Yes
--	-----

Do you consider that the Local Plan complies with the duty to co-operate?	Yes
--	-----

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The local plan is sound. The Green Belt reviews have correctly identified those areas of GB in Dorset which are of the highest protective value against urban sprawl

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Ralph Gregory (1190539)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Ralph Gregory (1190539)
Comment ID	PLPP264
Response Date	02/12/18 20:11
Consultation Point	Policy E4: Assessing flood risk (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? E4

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The Jacob report and recent work by the DCC have provided additional evidence that large scale construction in Lytchett Minster, would further increase the flood risk, and because of the multiple sources of potential flooding and the height of the water table, reliable mitigation would not be possible

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Cllr R Griffin (1185181)
Address	[REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Cllr R Griffin (1185181)
Comment ID	PLPP614
Response Date	03/12/18 10:13
Consultation Point	Chapter 6: Infrastructure (View)
Status	Processed
Submission Type	Letter
Version	0.3
Files	infrastructure-Griffin-PLPP614.pdf

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 6 Infrastructure

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?

No



For Office Use Only

Requester ID: 025

Consultee ID: 1185181

Comment ID's: PLPP614

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	CHAPTER 6 INFRASTRUCTURE
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- | | | | | |
|---|-----|-------------------------------------|----|--------------------------|
| • Legally compliant | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| • Sound | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

(Please continue on a separate sheet if necessary)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

I wish to express concern about the need for improvements in infrastructure. In the past 2-3 years Upton has seen an increase of some 200 dwellings / units of housing with no compensatory improvements in school places, medical facilities and traffic management. The developments proposed for Upton (Phase 1 & 2) will exacerbate the problems as will the new Bournemouth / Christchurch / Poole Council proposed developments on the edge of Upton, at Creekmoor.

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature: 

Date: 30-11-2018

Comment

Consultee	Mr Simon Groves (1190916)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Simon Groves (1190916)
Comment ID	PLPP252
Response Date	02/12/18 17:53
Consultation Point	Policy E12: Design (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Photo of Rabling Rd Photo of other bit of Rabling Rd
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy SHM
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

We were consulted on the Issues and Options consultation in 2014. I looked at it but don't recall seeing a plan on Townscape Character and Development (now map 9 on p55 on the Swanage Local Plan adopted June 2017). I am referring specifically to the areas north and south of Beach Gardens. I think this plan changed after the consultation. I can't find the original Issues and Options consultation paper easily on the portal or from the home page when using the search facility. So I can't back up my claim. This does not seem fair.

I support the protection of distinctive local character but don't understand why Rabling Rd and Walrond Rd are not included. This whole area is referred to as 'New Swanage' when it was developed, mainly in the 1930's. These two roads have the same style and character, and in my opinion, more examples of grandeur.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please include Rabling Rd and Walrond Rd in this zone of distinctive local character.

If you have any supporting documents please upload them here. Photo of other bit of Rabling Rd
Photo of other bit of Rabling Rd

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No





Comment

Consultee	Dr Mike Halsall (1189860)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Mike Halsall (1189860)
Comment ID	PLPP58
Response Date	28/11/18 10:39
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H8: Small sites next to existing settlements
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

There are approximately **30** residences in the Sunnyside/Bindon area of West Lulworth. This is in an area which is almost all designated 'Conservation Area' and it is surrounded by AONB and SSSI, and

close to the Heritage Coast. It is a site of considerable local history interest. It is also a conspicuous site when viewed from the western approach to the village.

The proposed sites for future development include four (one in Sunnyside, two in Bindon Rd and one at the bottom of Bindon Rd) with a total of **53** units which would almost encircle and completely dominate the **30** residences in the area. The present access is narrow, and upgrading this would be difficult and further destructive of the local environment.

In my opinion, the 'size, appearance and layout of proposed homes' would devastate the character and value of the Bindon/Sunnyside area of West Lulworth. It is contrary to Policy H8 paragraphs a and b.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Alex Cave (1191131)
Email Address	[REDACTED]
Company / Organisation	Origin3
Address	Tyndall House 17 Whiteladies Road Bristol BS8 1PB
Consultee	(1191135)
Company / Organisation	Halsall Homes
Address	1 Roman Way Bath Business Park Bath BA2 8SG
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Halsall Homes (- 1191135)
Comment ID	PLPP414
Response Date	03/12/18 15:39
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

These Representation to the Purbeck Local Plan Review Pre-submission Draft (October 2018) have been prepared by Origin3 on behalf of Halsall Homes Ltd in relation to their interests at Steppingstones, Stoborough, Dorset.

These Representations follows those made by Halsall in response to the Purbeck Local Plan – Issues and Options consultation during March 2015, the Options consultation during August 2016 and the New Homes for Purbeck Consultation during January 2018. These current Representations should be read alongside the aforementioned sets of Representation submitted by our client.

Halsall Homes supports the inclusion of Policy H1 which stipulates the quantum of overarching growth in Purbeck in the period 2018-2034, in terms of new homes. H1 policy text stating “at least 2,688 homes...” is supported. However, the accompanying text to this policy (para 110) and other references to the figure elsewhere within the Local Plan should clearly state the number of new homes are the minimum that will be provided in the period 2018-2034.

Paragraph 23 of the NPPF (2018) is clear that strategic policies should provide a clear strategy for bring sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development and as far as is consistent with other policies in the Framework. The need to treat objectively assessed need figure / housing targets as a minimum is crucial in supporting the Government’s objective of significantly boosting the supply of homes.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

References to the 2,688 homes figure should state clearly that the numbers of new homes are the minimum that will be provided in the period 2018-2036. This will make the Plan positively prepared, justified and consistent with National policy.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Alex Cave (1191131)
Email Address	[REDACTED]
Company / Organisation	Origin3
Address	Tyndall House 17 Whiteladies Road Bristol BS8 1PB
Consultee	(1191135)
Company / Organisation	Halsall Homes
Address	1 Roman Way Bath Business Park Bath BA2 8SG
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Halsall Homes (- 1191135)
Comment ID	PLPP415
Response Date	03/12/18 15:39
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H2
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

These Representation to the Purbeck Local Plan Review Pre-submission Draft (October 2018) have been prepared by Origin3 on behalf of Halsall Homes Ltd in relation to their interests at Steppingstones, Stoborough, Dorset.

These Representations follows those made by Halsall in response to the Purbeck Local Plan – Issues and Options consultation during March 2015, the Options consultation during August 2016 and the New Homes for Purbeck Consultation during January 2018. These current Representations should be read alongside the aforementioned sets of Representation submitted by our client.

The New Homes for Purbeck Consultation during January 2018 set out potential for a small site allocation at Sandford titled ‘a community led approach’. It is understood that this site allocation is now no longer being pursued within the Pre-submission draft of the plan. This approach is welcomed.

The Pre-submission draft of the Local Plan includes a newly introduced small sites policies which will work on a case-by-case basis in response to applications. The identification of a potential small site allocation at Sandford potentially afforded this particular site a form of consideration of and endorsement for development which other, potential more appropriate sites have not been afforded.

Through the New Homes for Purbeck Consultation during January 2018, the Council consulted upon its options for housing allocations in the local plan. Three options were proposed which could provide enough homes to address housing need and which took into account the constraints across the district. The three options presented offered little variance with which to compare and contrast the various potential different approaches to the development strategy.

It is considered that an appropriate balance between larger and smaller-scaled sites must be struck in order to ensure that the local plan will be successful and a robust five-year supply can be maintained across the duration of the plan.

The Local Plan strategy seeks to direct new housing, employment, shops, services and community facilities in the towns (Swanage, Wareham and Upton) and key services villages where growth will be proportionate to the size and character of the settlement.

Whilst the principle of this approach is sensible and generally supported, positive recognition should also be given to the remaining element of the Council’s distribution strategy at the lower order settlements, which seeks to ensure a spread of new homes across the District, meeting need where is arises.

As currently drafted, the final sentence of paragraph 113 states that “limited developments that are sympathetic to their surrounding will also be supported elsewhere across the District.” It is considered that the wording of this sentence is too broad-brush and requires further refinement towards delivering new growth sustainably, especially at the lower order settlements having regard to accessibility to key services and facilities.

As currently drafted the Plan fails to establish an effective distribution strategy that support sustainable patterns of development and plans flexibly in accordance with NPPF requirements and is therefore unsound as it not positively prepared, effective or consistent with the NPPF.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Given the variation in size and availability of services and facilities between settlements it should be recognised that varying levels of development could sustainably be accommodated depending on nature of the individual settlement.

The following revised wording is suggested instead of the final sentence of paragraph 113;

“Elsewhere in the District the local plan strategy supports some growth in conformity with other policies of this plan to facilitate appropriate opportunities for villages to grow sustainably, organically and ensuring flexibility to adapt to changing needs”.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Alex Cave (1191131)
Email Address	[REDACTED]
Company / Organisation	Origin3
Address	Tyndall House 17 Whiteladies Road Bristol BS8 1PB
Consultee	(1191135)
Company / Organisation	Halsall Homes
Address	1 Roman Way Bath Business Park Bath BA2 8SG
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Halsall Homes (- 1191135)
Comment ID	PLPP416
Response Date	03/12/18 15:39
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H3
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy H3 states that “development proposals submitted for sites allocated in policies H4 to H8 must comply with all other relevant policies in the Purbeck Local Plan”. Development proposal submitted under policy H8 (small sites) would not be formally “allocated” as would come forward on a case-by-case basis.

It is queried as to whether this should therefore mean H7 instead of H8?

Furthermore, the condition that proposals on allocated site “must” comply with “all” other relevant policies is considered to be too restrictive. The development plan should be read as a whole, with a focus on its objectives and the policies that give effect to them. Conflict with a single policy or part of a policy does not necessarily mean an application fails to accord with the development plan as a whole. Policy H3 fails to establish a deliverable development strategy that is effective and plans flexibly in accordance with NPPF requirement and is considered unsound as it is not effective or consistent with the NPPF.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The first sentence of policy H3 should be amended to allow for greater flexibility. Proposed wording is as follows “Development proposals submitted for sites allocated in policies H4 to H7 will be supported where they comply with relevant policies in the Purbeck Local Plan.”

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Alex Cave (1191131)
Email Address	[REDACTED]
Company / Organisation	Origin3
Address	Tyndall House 17 Whiteladies Road Bristol BS8 1PB
Consultee	(1191135)
Company / Organisation	Halsall Homes
Address	1 Roman Way Bath Business Park Bath BA2 8SG
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Halsall Homes (- 1191135)
Comment ID	PLPP417
Response Date	03/12/18 15:40
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

These Representation to the Purbeck Local Plan Review Pre-submission Draft (October 2018) have been prepared by Origin3 on behalf of Halsall Homes Ltd in relation to their interests at Steppingstones, Stoborough, Dorset.

These Representations follows those made by Halsall in response to the Purbeck Local Plan – Issues and Options consultation during March 2015, the Options consultation during August 2016 and the New Homes for Purbeck Consultation during January 2018. These current Representations should be read alongside the aforementioned sets of Representation submitted by our client.

The introduction of a new permissive small sites policy is supported in-principle. This introduces much needed flexibility into local planning policy in Purbeck District to enable the Local Plan to be responsive to changing needs and requirements and for Purbeck to meet its' objectively assessed housing need.

Policy H8 set out that there will be a number of criteria upon which the approach will operate to ensure smaller housing developments are in keeping with the distinctive character of Purbeck, these are as follows:

- 1 Adjacent to existing homes in the closest town or village (as defined in the settlement hierarchy in the glossary of the plan), and do not appear isolated in the countryside;
- 2 The scale of proposed development is proportionate to the size and character of the existing settlement, up to a maximum of 30 homes;
- 3 Individually and cumulatively, the size, appearance and layout of the proposed homes must not harm the character and value of any landscape or settlement potentially affected by the proposals; and
- 4 The development would contribute to the provision of a mix of different types and sizes of homes to reflect the Council's expectations in Policy H9 or, where expressed in a neighbourhood plan, those of the relevant local community.

The application of the proposed policy at the local service villages level of the settlement hierarchy, including Stoborough, is supported.

The notion that housing growth should be directed to settlements that have good access to services and facilities is wholly supported.

Given the variation in size and availability of services and facilities between all the settlements with the hierarchy it should be recognised that varying levels of development could sustainably be accommodated depending on nature of the individual settlement. As such, the concept of applying an upper limit on development quantum is not supported. The current approach which caps development up to 30 units could potentially restrict the effectiveness of the policy in delivering housing on appropriate small scale sites.

This appears a rather arbitrary limitation on development and does not reflect the fact that each potentially suitable site is different and should be considered on a case-by-case basis. Furthermore, what may be considered acceptable in terms of scale at the key towns such as Swanage, Upton and Wareham may not be appropriate at the 'other villages' level of the settlement hierarchy.

The wording of the locational requirement of the policy is considered to be too restrictive in that sites must be "adjacent to existing homes". There may be instances where suitable sites are adjacent to

other land uses for example employment or community uses which would arguable not benefit from this policy as currently drafted. Greater flexibility should be implemented through this policy as to not provide a barrier to sustainable development and growth within the rural areas of the District.

Whilst the introduction of a new permissive small sites policy is supported in-principle it is questioned as to whether the cap on development quantum establishes a deliverable strategy that is flexible and effective in accordance with NPPF and therefore may fail the test of soundness in not being positively prepared, justified or effective.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

A more permissive policy approach might be best employed. An example would be Policy SS2 in South Somerset District which states, amongst other criteria, that: 'development will be permitted where it is commensurate with the scale and character of the settlement'. It also has a policy criteria linked to the accessibility of key services: 'proposals for housing development should only be permitted in Rural Settlements that have access to two or more key services'. Key services are defined as:

- 1 Local convenience shop;
- 2 Post office;
- 3 Pub;
- 4 Children's play area/sports pitch;
- 5 Village hall/community centre;
- 6 Health centre;
- 7 Faith facility; and
- 8 Primary school.

In consideration of the availability of these key services, Stoborough would be a far more sustainable option for housing development than some of the 'other villages', many of which are effectively large hamlets with no key services. Stoborough has a shop, a pub, a recreation ground, a village hall and a primary school. All of which is highly commendable in consideration of the number of existing residences. There is therefore an opportunity for growth which promotes self-containment and promotes sustainable patterns of development.

In terms of the locational requirements of the policy, it is suggested that "*adjacent to existing homes*" should be revised to "adjacent to the existing built up area (or settlement boundaries where defined)" in order to provide flexibility for sites to come forward which are not directly adjacent to existing homes. It is not only sites adjacent to existing homes which should be considered suitable. Sites adjacent to alternative land uses may be appropriate for accommodating small scale development in rural areas and be suitable to support sustainable development.

The wording 'homes must not harm the character and value of any landscape or settlements' is not supported. This does not account for the benefits of development outweighing adverse impacts. The NPPF Paragraph 11 tilted balance recommends that adverse impacts must significantly and demonstrably outweigh the benefits for permission to be granted. As currently worded, any harm, however minor, would mean that all development proposal would fail this particular criteria.

The distinction is made in the policy wording between settlements in the Green Belt and in the AONB. It is suggested that for villages within the Green Belt, only limited development that fills gaps between existing houses will be permitted. This is supported and is entirely appropriate as it is not for this small sites policy to determine what an appropriate release of land from the Green Belt is. NPPF Paragraph 136 clearly states that, once established, Green Belt boundaries should only be altered in exceptional

circumstances, through the preparation or review of the Local Plan. It states that the construction of new buildings in the Green Belt is inappropriate and sets out the exceptions to this – one of which is limited infilling in villages. This part of the policy is therefore consistent with national policy.

In relation to development in AONB, the NPPF sets out that exceptional circumstances must exist for major development to take place (a distinction from construction of new buildings – as with Green Belt policy). However, it does not state that these exceptional circumstances must be as part of a Local Plan preparation or review. NPPF Paragraph 172 sets out the considerations for determining whether exceptional circumstances exist, which are determined on a case-by-case basis for each application for major development. By reasoning of scale, context and potential for landscape impacts which cannot be mitigated, the Steppingstones proposal is not considered to represent 'major development' in the AONB, on the same scale as the previous draft allocation West Wareham, which would require the consideration of NPPF Paragraph 172.

There appears to be a general acknowledgement in the consultation and the evidence base that underpins it that development in the AONB will have to take place in Purbeck in order for the objectively assessed need for housing to be met and for those communities within the AONB to have their housing needs met. This notion is supported. Indeed, the proposed small sites policy does not make reference to NPPF Paragraph 172 and the criteria for major development, thereby indicating that proposals coming forward under this policy will not be considered as 'major development' for these purposes.

Halsall Homes will imminently be submitting a planning application for a new residential development on Steppingstones Field, Stoborough under the umbrella of the emerging small sites policy. This is the culmination of a comprehensive process of stakeholder engagement. The application submission will be supported by a series of detailed technical assessment (landscape, ecology, transport, drainage, archaeology and noise) which demonstrate that there are no adverse impacts of the proposed development that would significantly or demonstrably outweigh the benefit of the development.

The site at Steppingstones Field, Stoborough is an entirely appropriate and sustainable location for commensurate housing growth at Stoborough and would make a contribution towards the housing needs of Purbeck, but is also one of only a handful of opportunities to deliver against the parish-wide housing needs of Arne. Housing growth at Stoborough will help to sustain the vitality of the community services, facilities and employment offerings.

Arne Parish Council support the delivery of affordable housing within the parish boundary. Their response to the Local Plan Review consultation in August 2016 confirms there exists a need: "*Many local people cannot afford the high prices of market housing in Purbeck. Affordable housing is needed in order to retain and attract young people and key workers – and to support local employment and skills*". Their initial vision statement for the parish area reads: "*Arne Parish has a unique natural environment formed by past cultural, economic, social and agricultural practices. While recognising and protecting its heritage, we seek to ensure the long-term sustainability and viability of the parish through environmental and economic measures that will develop the community and its charm, so that all its residents, young or old, continue to live in a community in which they feel safe, cared for and happy*".

Development at Steppingstones would be in close walking-distance proximity to a range of community-based facilities and services. It would help to facilitate desirable pedestrian and cycle links to the nearby Holme Lane SANG, be able to take advantage of close connections with Wareham and be located in close proximity to public transport options to further afield.

The site has the capacity to deliver circa 30 new houses, delivering a mix of market and affordable housing available for different tenures to help meet the locally identified affordable housing need, and a recreational open space with additional heathland planting. The Parish Council support the delivery of affordable housing with Arne Parish. It may also be able to contribute towards meeting any unmet needs arising from the potentially less sustainable and more constrained neighbouring parishes of Church Knowle, East Holme and East Stoke.

The scheme also provides an opportunity to better manage overland surface-water drainage flows from the site which currently end up in the culverted watercourse under the A351 / West Lane junction, the opportunity arises to retain and store surface water on-site during storm events.

Submitted with previous Representation is an 'Alternative Site Assessment' which demonstrate that Arne Parish has a very limited number of opportunities for growth to meet its identified housing needs. Halsall's site at Steppingstones represents a sustainable location for housing and is one of a very limited number of opportunities to deliver against the housing needs of Arne Parish in an appropriate and sustainable location.

Alongside the publication of the Pre-submission draft of the Local Plan is an updated Strategic Housing Land Availability Assessment (SHLAA, October 2018). The SHLAA comprise two sections; large and small sites to allow for consideration of small sites up to 30 units in light of the Council newly introduced small sites policy. The introduction of the small sites sections sets out that the "*first criteria of the policy is the key test in order to ascertain if the site is adjacent to existing dwellings in the closest town or village and if the proposed capacity is suitable for the location.*"

The full extent of land under our client's control was promoted through the SHLAA during June 2018, however only part of the site has been recorded within the revised SHLAA (October 2018), identified under "small sites currently suitable for development".

A SHLAA is used to record the future supply of land which is suitable, available and achievable for housing and economic development use over the plan period. It is considered that sites promoted through the SHLAA should be documented and recorded in their entirety so that a comprehensive record of available land is established. It is questioned as to whether it is within the remit of the SHLAA to make amendments to site boundaries / extent of sites which are being promoted / submitted.

It is also queried as to why there is no detail in respect of the Councils assessments for the sites contained in the "small site section" within the SHLAA. All that is published is the site address and an indicative quantum of development that could be accommodated. There is no supporting text justifying the Council's assessment of the site.

Applications for planning permission should be determined by the Council based on their individual merit, taking into account the policies contained within the local plan and all other material considerations. The result of the SHLAA assessment should not have influence on any future decisions of the Council at decision making stage. It is the role of the SHLAA assessment to provide information on the range of site which are available to meet need, but it is for the development plan and development control process to determine which of those sites are the most suitable to meet needs and are acceptable in planning policy terms.

Arguably, the overall approach for the small sites policy does not go far enough. The requirement at NPPF Paragraph 11 for local planning authorities to '*positively seek opportunities to meet the development needs of their area*' will not be fully achieved. It is felt that the evidence base should explore and assess in full a range of site options on a parish-by-parish basis for the small sites policy, otherwise questions over certainty and delivery will arise. The approach currently taken may not be

considered to be positively prepared, justified or effective. It is considered that the Local Plan should identify the most sustainable and appropriate options for delivery on small sites.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

The matters raised in the Representations require detailed consideration and the opportunity to question Officers about the soundness of key policies and the evidence base which supports them. As such, we would welcome the opportunity to participate at the examination to contribute to the discussion of the Inspector's questions arising from our representations and thereby assist to ensure the plan is sound and compliant.

Comment

Agent	Alex Cave (1191131)
Email Address	[REDACTED]
Company / Organisation	Origin3
Address	Tyndall House 17 Whiteladies Road Bristol BS8 1PB
Consultee	(1191135)
Company / Organisation	Halsall Homes
Address	1 Roman Way Bath Business Park Bath BA2 8SG
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Halsall Homes (- 1191135)
Comment ID	PLPP418
Response Date	03/12/18 15:40
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H11
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The move towards a District wide affordable housing thresholds set out in Policy H11 is noted. In addition, the revised affordable housing thresholds borne out of the recommendations of the 2018 viability assessment are also noted.

Policy H11 seeks to introduce a requirement of 10% of the affordable homes provided on eligible development sites to be social rented. In consideration of adopted Policy AHT, which recommends that 90% of affordable housing is made available for social and affordable rent, with the remaining 10% being made available for intermediate housing products, it is considered that an adequate policy mechanism exists to promote the delivery of this particular tenure.

With the proposed policy requirement in place, there is the potential for some schemes becoming financially unviable and in some instances becoming unattractive to Registered Providers (RPs).

It is also noted that the Government has a requirement in the revised NPPF for local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products. The message on affordable housing priorities is in danger of becoming mixed and it is therefore questioned as to whether this policy is positively prepared and or consistent with national policy.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Local planning policy should align with the aspirations of national policy to ensure consistency with the NPPF and ensure sustainable, deliverable and viable development is achieved.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Alex Cave (1191131)
Email Address	[REDACTED]
Company / Organisation	Origin3
Address	Tyndall House 17 Whiteladies Road Bristol BS8 1PB
Consultee	(1191135)
Company / Organisation	Halsall Homes
Address	1 Roman Way Bath Business Park Bath BA2 8SG
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Halsall Homes (- 1191135)
Comment ID	PLPP419
Response Date	03/12/18 15:40
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H14
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy H14 seeks to ensure proposals for all new housing in the AONB will be restricted to dwellings of principal residence in perpetuity. This will include those homes permitted on small sites through the newly introduced small sites policy and on rural exception sites.

It is noted that second home ownership is an issue that can undermine the sustainability of rural communities. As a matter of principle, the higher proportion of primary residences in a settlement, generally the more thriving and sustainable that settlement is. However, it should be made clear that introducing a policy such as this has the potential to have profound and unanticipated implications on the local housing market.

This policy would restrict the flexibility of the local housing stock to respond to changes in the housing market and will therefore restrict long-term transactions in the areas which are the subject of this policy, to the detriment of existing residents as well as the residents who wish to buy property there. Paragraph 11 of the NPPF is clear in that "*plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adopt to rapid change.*"

As there would effectively cease to be any additions to the supply of secondary residences, the existing stock of homes will be made even more unaffordable due to the constrained supply and increased competition for purchase. There is no evidence to suggest that demand would reduce.

We would raise questions over the effectiveness of the policy in reducing affordability issues within Purbeck District. Is it serving to displace unaffordability to other areas of the district where the policy is not in place or even neighbouring authority areas? Have neighbouring authority areas been consulted through the duty to cooperate on such matters?

It is considered that the policy is not justified and it is therefore unsound.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

In recent examples across the UK, many primary residence policies have been brought in at a neighbourhood plan level rather than a local planning authority level. Issues of primary residence and affordability may be better served by being considered in detail at this more local level with specific local based evidence to justify.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Nigel Hartnell (1190613)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Nigel Hartnell (1190613)
Comment ID	PLPP222
Response Date	02/12/18 09:54
Consultation Point	Identifying a local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H1

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

There has been no consultation or survey done within the West Lulworth area to justify the stated demand for houses within the village. The most recent development resulted in a significant number of the new houses ending up as holiday lets which is not conducive to the sustainability of the community

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

A proper survey should be carried out within West Lulworth to establish the genuine need for housing and the types of housing required, this could then be turned into a development plan that would genuinely reflect the sustainability and development requirements of the village

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Nigel Hartnell (1190613)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Nigel Hartnell (1190613)
Comment ID	PLPP223
Response Date	02/12/18 09:56
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The proposal to site 107 homes within West Lulworth is not "proportionate to the size of the settlement" being more than 25% increase over the most recent estimate of the size of the village. It is not "proportionate to the character" of the village which is a "rural area", a Conservation area, an AONB,

and borders a World Heritage site. At 107 homes it breaches the policy of "up to a maximum of 30 homes per settlement"

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The scale should be reduced to below 30 houses in such a way as to minimise the impact on the heritage character of the village.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Nigel Hartnell (1190613)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Nigel Hartnell (1190613)
Comment ID	PLPP224
Response Date	02/12/18 09:57
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Para 145

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

There is insufficient infrastructure and services within West Lulworth to support the increase of 25% in the housing stock and the concomitant increase in population. The roads are already overwhelmed in the summer, the roads around the proposed sites are country lanes. The drainage system has difficulty in coping with the rainfall off the hills, more concrete on these hills will exacerbate this. The

village has limited services , not being a "Key Services Village". There is no Post Office, no GP surgery, a derisory bus service, and limited shopping particularly in the winter.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Reduce the scale of the proposed development to a maximum of 30 as per Policy H8

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Ms Alexandra Harwood (1190935)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Alexandra Harwood (1190935)
Comment ID	PLPP267
Response Date	02/12/18 21:12
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I feel that the plan is disproportionate, nearly 26 per cent of identified sites in the area are in West Lulworth. The criteria set out by the council appears to say 'up to a maximum of 30 houses in 2 sites per settlement' and that 'these should not harm the character or landscape of the settlement.' This contradicts the proposed plan. The SHLAA guidelines state there should be a 400 metre buffer zone

between conservation land, AONB, SSI, World Heritage Sites etc must fall in this category, yet the proposals for several of the sites in West Lulworth have boundaries touching conserved or protected land. Building on the Allotment Gardens, Bindon Road would be in complete opposition to the councils Healthy Living Policy, taking away a vital resource. The already high level of second homes & holiday rental properties in this area means there are fewer true 'residents', therefore fewer responses to the plans. This is unfair. The last two small properties sold, in the Sunnyside area of the village, both went as holiday lets, not to young families or essential workers. Who are all these people who are going to buy/rent these 'affordable' homes? (if any of them end up being cheap enough of course!) The existing infrastructure just isn't up to coping with such huge numbers of people, never mind the disruption caused during actual building. Most of the sites mentioned are on steep hillsides which would involved huge amounts of excavation, drainage & landscaping. All of which would surely ruin the 'special character' of the village that is mentioned in the councils recommendations for small sites developments. The plan contradicts the councils policy on several points, so is not sound.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee Mr and Mrs Trevor and Diane Hayles (1190450)

Email Address [REDACTED]

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name Purbeck Local Plan Pre-submission Draft

Comment by Mr and Mrs Trevor and Diane Hayles (1190450)

Comment ID PLPP106

Response Date 29/11/18 16:19

Consultation Point Chapter 4: Housing ([View](#))

Status Processed

Submission Type Web

Version 0.4

Are you responding on behalf of a group? No

If yes, how many people do you represent? 2

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy H5

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I am not qualified to answer the above questions so have said "NO" to all.

Housing - Policy H5

In October 2010, PDC declared that of the 2400 houses they were committed to build by 2026, **NONE** were to be built in Wool, a position re-affirmed in 2012, when concerns were raised that building on the land to the west of Oakdene Road/Chalk Pit Road would inevitably lead to significant housing creep to the south and west and towards an ANOB. Yet only a handful of years later PDC are seemingly now in favour of proposals to build several hundred houses on the land they had previously been keen to protect.

Wool residents have consistently and overwhelmingly been against these proposals, despite PDC on occasion providing incorrect information, information that might have swayed residents to modify their views. Two examples of this are (a) stating that there was "significant support" from an earlier consultation for 1000 houses in Wool whilst later admitting that this was incorrect, (b) referring to the possibility that a bypass for Wool "could be considered" yet apparently already knowing that all plans for such a bypass had already been deleted by Dorset County. Ignoring this opposition, PDC proceeded with a consultation exercise which offered three options all of which called for massive housing building in Wool. There was no option to build anything less than 470; an option to build between 30 and 70 houses would have been well by received local residents, as it would match genuine LOCAL VILLAGE NEEDS. So much for democracy.

The result of this consultation is that Wool is to have 470 houses, a 65-bed care home, a community hub and recreational space. 320 of the houses are to be built in the green fields to the west of Oakdene Road/Chalk Pit Lane. As this is one-third the number of houses in the original landowners plan it would be reasonable to expect that the amount of land to be developed would be proportionately reduced. Instead, additional buildings are now included which did not form part of the original plan for these fields, and a change of use not previously mentioned nor consulted upon.

Building on this scale will completely change the character of the village and result in an unsupportable increase in the village population. Dorset County Council figures show that on average, each domestic dwelling in Purbeck houses just over two people. For Wool, this suggests an increase of at least 950 people equating to a 37% increase over the current figure; this is over three times the rate for Purbeck as a whole. The same DCC report also states that on average there are 1.4 vehicles attached to each dwelling, resulting in a probable increase of 650 plus cars that will lead to several thousand additional journeys each day. This together with PDCs acknowledgment of "significant in-commuting" will result in indefensible traffic problems. The proposed village hub will divide the village into three segments with shops near the old village, near to Chalk Pit Lane and the proposed new development. Instead of PDCs vision of "creating thriving communities", a fractured village will result.

It has been suggested elsewhere that the anticipated increase in jobs on the Innovation Park will lead to an increased demand for housing in Wool. That is demonstrably not the case, nor is there any evidence that the building of new houses on this scale will lead to more jobs moving into the area.

There is simply NO EVIDENCE BASED NEED for housing on this scale in Wool.

There are two further issues related to building on these fields. Firstly, the fields are Grade 2 and 3 on the DEFRA Agricultural Land Classification, and given that the population of the UK is growing, it seems irresponsibly destructive to tarmac over quality food growing land. Secondly, were development to take place here, what studies have been undertaken into the possibility of surface water flooding affecting houses along Oakdene Road ?. The land slopes towards these houses and as the gardens are two feet lower than the fields, guarantees **MUST** be given that the necessary flood prevention measures would be taken. This should take the form of a wide natural hedge together with a suitable sized drainage ditch. This would also form a necessary corridor for wildlife and provide some measure of privacy to those houses most directly impacted by any development.

As an alternative to building on these fields, it should be remembered that PDC identified sufficient land to the north of Dorchester Road to accommodate all the proposed building – the Consultation document shows land available in this area as suitable for 680 houses. The land here is constrained on it's northern edge by the river/railway line, on it's western edge by the Technology Park and on it's southern edge by the main Dorchester Road; there is no eastern edge as the railway line and road converge. It is a mixture of farmland and housing and appears to fit the definition of "infill". The land to the south of Dorchester Road however, is open land that stretches uninterrupted to the sea and to the west. If this option were followed, there would be far less visual impact on the village and given that the 2688 houses now needed roughly equates to the 2010 figure, it would neatly provide PDC with the opportunity to re-establish their 2010 position of protecting open farmland.

Given PDCs history of largely ignoring local residents views, I have little confidence that any of these points will be considered. The only certainty about the Plan is that hundreds of houses will be built, and the existing infrastructure, which can barely cope now, will certainly not cope with this proposed level of development. There are no guarantees in the proposal that this will change as many areas are apparently the subject of consultations with other relevant bodies. It is imperative therefore, that objectives and timescales with each body mentioned are spelt out before any building takes place to ensure that positive outcomes are actually achieved.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

To be able to support comments made above.

Comment

Consultee	Mr and Mrs Trevor and Diane Hayles (1190450)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr and Mrs Trevor and Diane Hayles (1190450)
Comment ID	PLPP107
Response Date	29/11/18 16:20
Consultation Point	Policy IM1: Tools for delivery - the Purbeck Local Plan implementation strategy (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	2
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	IM1
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I am not qualified to answer the above questions so have said "NO" to all.

DEFERMENT ISSUES – POLICY IM1

The reorganisation of Dorset's Councils will take place on 1st. April 2019. From that date, control of housing development in all of Dorset (with the exception of Poole, Bournemouth and Christchurch), will pass to the new authority and they will become accountable from that date. This means that the new authority will be responsible for the implementation of all the Local Plans developed by the soon to be defunct District Councils though having had no direct say in the construction of those Plans. Conversely, those same District Councils who were the sponsors of these Local Plans will no longer exist and therefore cannot be held accountable. Despite there being some parallel shadowing between the new and old authorities, this seems grossly unfair to the new authority and means that local residents across Purbeck will have no one who is properly and reasonably accountable.

But would the following be both a pragmatic and very visible way of underlining the benefits of democracy at all levels and at the same time giving the new authority a real say in housing development thereby ensuring that we, the local populace can actually hold some one accountable.

Announce a delay in the formal acceptance of these Local Plans until after 1st April 2019 to allow the new authority time to meld and create a single Plan taking into account as much or as little of the Local Plans as they think meet their wider brief. This could then be "put to the people" and would be seen as a firm statement of the value of local democracy. At the same time, underline this value in local democracy by promoting the creation of as many Neighbourhood Plans at Parish level as possible to provide the new Authority with a much clearer view of real local needs and by default, assuring the new authority of local support. As this approach would inevitably delay the whole process, allow some small-scale building to go ahead to match the need for affordable housing at Parish level.

Central Government quite clearly sees Purbeck as being more closely allied to rural Dorset in every respect except for housing where at present, it is deemed that Purbeck fits better with Poole and Bournemouth. Would it not make better sense to remove this illogical anomaly and make the new authority responsible for both ?. That at least would avoid Purbeck being treated as a permanent overspill area for our urban neighbours.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

To support the comments made above.

Comment

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mr Anthony Hazell (1188986)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Anthony Hazell (1188986)
Comment ID	PLPP18
Response Date	22/11/18 12:00
Consultation Point	Lytchett Matravers - 150 homes and a SANG (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Hydrology opinion
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H6
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The release of Green Belt land in **Policy V2** and the site allocations made in **Policy H6** are **supported** inasmuch as they exclude the option of development off Deans Drove. The suitability of this site for development was in effect considered very recently through the submission of a planning application (ref 6/2016/0743) for affordable housing, and was refused in February 2018. The reason for refusal given was that the proposed development did not comply with Purbeck Local Plan Part 1 Policy RES as the site is not within close proximity to, and is not served by sustainable transport providing access to local employment opportunities, shops, services and community facilities. Furthermore, evidence had not been submitted to demonstrate that the site is the only realistic option in the parish that can provide affordable homes. There are also a number of other reasons raised by local residents and the Parish Council as to why development of that site was undesirable, including concerns regarding drainage, impact on trees, loss of amenity and encroachment into an area of countryside that is Green Belt.

However an **objection** is raised in terms of the lack of acknowledgement in respect of local drainage issues and solutions in **Policy H6**. The village has suffered from sewage inundation and associated flooding the SFRA notes that between 2008 and 2017 there have been 92 incidents of sewer flooding or backing up in Lytchett Matravers caused by groundwater inundation into sewers. There are many localised springs whose underground channels and aquifers are not charted and therefore need further detailed study. And there is no mention of any specific improvement planned in the Infrastructure study, despite the fact that as part of the Local Plan consultation Wessex Water reported "that agreed points of connection with local upsizing works for supply and waste services will be needed. The foul sewage pumping station will need to be upgraded with emergency storage and downstream upsizing works also necessary."

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Suggested amendments: update supporting text to refer to localised flooding issues around the village, and amend criteria (b) of Policy H6 to include drainage infrastructure, and add further criteria along the following lines:

"(c) include detailed examination of flooding issues including groundwater flows that may be impacted off-site, and ensure appropriate mitigation"

If you have any supporting documents please upload them here.

[Hydrology opinion](#)
Hydrology opinion

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

THE POTENTIAL ENVIRONMENTAL IMPACT OF THE PLANNED FOXHILL HOUSING DEVELOPMENT.

By J.R.Temple Hazell, CGeol, MIAH .

Introduction.

This note concerns the potential environmental impact locally of the planned Foxhill /Deans Drove housing development, termed 'the Site.' Possible issues relate to the hydrological balance, which is in precarious equilibrium with the physical environment, and also to ground stability. These have for ever been and always will be at the mercy of human intervention. Components in this environmental balance are geology, soil, topography, surface hydrology and hydrogeology.

Geology.

The sub-surface lithology in the vicinity of the Site comprises clay and sandy clay with lenses of sand and gravel, all part of the Hampshire Basin component of the so-called 'London Clay' formation.

Soil.

The soil, which has low permeability is dominantly of clay, the outcome of ages of cultivation of the 'London Clay'.

Topography.

The land surface, locally at its highest half a mile NNE of the site, dips gently to the south. Superimposed on this trend is a series of youthful shallow valleys, controlled by underlying geological structures, which are directed radially from the highest ground,.

Landform development and global warming.

The present day incised valleys are oversized for the load of water they carry. This is a manifestation of the fact that the rainfall of past years was greater than it is now. Pluvial periods have dominated the landscape since the end of the ice age, and will do so again. **Global warming is no longer a fanciful**

theory but a stark fact. Predictions made fifty years ago – for instance that rainfall will become more intense – are being borne out. According to NERC (See footnote) there will be more frequent flooding episodes.

Surface hydrology.

Precipitated rain on green fields is largely absorbed into the soil and filtered through the biological soil profile; excess migrates into the groundwater zone. After exceptionally heavy rain, when the soil is saturated, ephemeral sheet wash carries the undigested excess down gradient to streams. In areas of dense housing cover, where impervious surfaces dominate, there is much more run-off than soak-in and drainage systems are under strain. The resulting sheet wash causes local flooding.

Hydrogeology.

The sand and gravel lenses comprise minor lenticular aquifers. Where these have been cut by erosion processes there are springs in valley bottoms. These plentiful springs once constituted the domestic water supply for the village. One such spring is the source of the stream which flows southwards next to the Site.

Environmental impact.

In times past spring water, which supplied the domestic needs of Lytchett Matravers, was returned after use to the land, filtered through the soil profile and entered the ground water system, being thus re-integrated into the hydrological cycle. Human intervention at that time had little or no effect on this balance. With recent housing development and more water usage per capita for the increased population, water to satisfy local needs was imported by utility companies. Some of it was subsequently exported as grey water but some entered the local hydrological system. This tipped the balance and initiated local flooding, which is now an increasing threat.

The planning application is for a housing development in an area of approximately 2 hectares, comprising 23 houses. Access roads within the area, driveways and buildings would render over half of the surface impermeable. This would exacerbate the disequilibrium.

Local flooding, already described, would increase and, because of climatic change and further development of this type, will become a major problem. Sporadic spate in the stream west of the site would increase from a nuisance to a threat. Storm drains, if any were installed, could not deal effectively with flash floods. What these drains intercepted would simply lead to more intense flooding downstream.

Because the lenticular sand and pebble aquifers are not well charted, it is not known whether excavation for foundations within the Site will lead to local problems.

Reference.

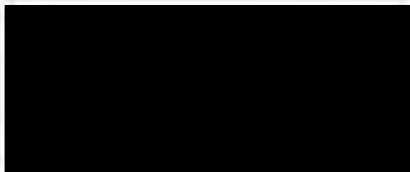
Extract from the Introduction to a report on NERC research programme on Flood Risk from Extreme Events (FREE):

"Background & objectives

Climate change will probably bring more frequent and intense storms to the UK, in turn bringing more floods. In recent years flood damage has cost the UK about £1bn each year, so it is essential that we improve our ability to forecast, quantify and manage flood risks, and mitigate the effects of climate variability and change.

The FREE programme brought researchers from the hydrological, meteorological, terrestrial and coastal oceanography communities together in an integrated research programme for the first time."

Signed.



Date. 10/02/2015

J.R .Temple Hazell, (Chartered Geologist, Member of the International Association of Hydrogeologists.)

Comment

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mr Anthony Hazell (1188986)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Anthony Hazell (1188986)
Comment ID	PLPP19
Response Date	22/11/18 12:07
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Decision notice 180206.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

An **objection** is made in regard to **Policy H8** which effectively opens up the potential for sites such as land off Deans Drove in Lytchett Matravers to be developed. The suitability of this site for development was considered very recently through the submission of a planning application (ref 6/2016/0743) for affordable housing, and was refused in February 2018. The reason for refusal given was that the proposed development did not comply with Purbeck Local Plan Part 1 Policy RES as the site is not within close proximity to, and is not served by sustainable transport providing access to local employment opportunities, shops, services and community facilities. This factor should apply equally to open market as it would to affordable housing provision. Furthermore, the ability for this policy to enable the release of Green Belt land when this is not possible through the Neighbourhood Plan route (where the release of Green Belt land around Lytchett Matravers is precisely defined, and no reference made to potential for the Neighbourhood Plan to be used as the most appropriate vehicle for further housing sites to be released) would appear unreasonable and goes against the concept of a plan-led system in which the local community have genuine involvement in planning for their future growth.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Suggested amendments: DELETE policy, or if it is to be retained, include further criteria along the following lines:

“(d) there is an opportunity to use sustainable modes of transport (walking, cycling and public transport) to access jobs, services and facilities;

(e) there are no other adverse impacts identified that would outweigh the local need for housing;

(f) the site does not lie within a Neighbourhood Plan area where small sites have or are proposed to be allocated to meet identified housing needs.”

If you have any supporting documents please upload them here. [Decision notice 180206.pdf](#)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Stonewater Housing Association
c/o Boon Brown Architects Ltd
Motivo
Alvington
Yeovil
BA20 2FG

Town and Country Planning Act 1990
Town and Country Planning
(Development Management Procedure) (England) Order 2015

Refusal Of Planning Permission

Application Number: 6/2016/0743
Case Officer: Alan Davies
Applicant: Stonewater Housing Association
Location: Land at Deans Drove, Lytchett Matravers, BH16 6EQ
Description: Development of the site with 16 affordable houses to rent, and 7 open market houses, with associated access, parking and landscaping
Decision Date: 6 February 2018

Purbeck District Council refuse planning permission for this development as detailed in the application. In making this decision the Council considered whether the application could be approved with or without conditions or should be refused.

The application was refused for the reason detailed over the page.

Alan Davies

.....
Alan Davies
Development Manager

1.The proposal does not comply with Purbeck Local Plan Part 1 Policy RES because the site is not within close proximity to, and is not served by sustainable transport providing access to local employment opportunities, shops, services and community facilities. Furthermore, evidence has not been submitted to demonstrate that the site is the only realistic option in the parish that can provide affordable homes.

2.Informative Note - Refused Plans. The plans that were considered by the Council in making this decision are: P6624-01, PL001B, PL002C, PL003G, PL004E, PL005D, PL006C, PL007B, PL008B, PL009B, PL010B, PL011B, PL012B, PL013B, PL014B, PL015B, PL016B, PL017B, PL018B, PL019B, PL020B, PL021C, PL022C, PL023C, PL024C, PL025C, PL026C, PL027B, PL029B, PL030B, PL031B, PL032B, PL033B, PL034B, PL035B, PL036B, PL037B, PL038B, PL039B, PL040B, PL041B, PL042B, PL050, PL051A and PL060D.

Reason: For the avoidance of doubt and in the interests of proper planning.

3.Informative Note -Community Infrastructure Levy. If planning permission is subsequently granted for this development on appeal, it will be subject to the Community Infrastructure Levy (CIL) introduced by the Town and Country Planning Act 2008. A CIL liability notice will then be issued by the Council that requires a financial payment, full details of which will be explained in the notice.

4.Statement of positive and proactive working: In accordance with paragraphs 186 and 187 of the National Planning Policy Framework, the Council takes a positive and proactive approach to development proposals focused on solutions. The Council works with applicants/agents in a positive and proactive manner by; offering a pre-application advice service, and as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible suggesting solutions.

For this application: The applicant / agent and the Council have worked together to minimise the reasons for refusal.

Planning Decision Notes

Power to refuse planning permission

This decision is issued by Purbeck District Council as the local planning authority set out by the Town and Country Planning Act 1990 (as amended) and the Town and Country (Development Management Procedure) (England) Order 2015.

Removal of application site notice

If you have not already done so I would be grateful if you could take down and dispose of this application's site notice if it is still being displayed outside the property.

Appeals to the Secretary of State

If you disagree with our decision or the attached conditions, then you can appeal to the Secretary of State (Planning Inspectorate) under section 78 (1) of the Town and Country Planning Act 1990.

If you want to appeal, then you must do so within **SIX MONTHS** of the date of this notice.

If an **enforcement notice** is served relating to the same or substantially the same land and development as in your application and you want to appeal against our decision, then you must do so within **28 days of the date of service of the enforcement notice**, or within **SIX MONTHS** of the date of the decision notice, whichever date expires first.

An appeal must be made by the applicant. You must use a form that you can get from the Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or an appeal can be made on-line at this website <https://www.gov.uk/planning-inspectorate>

The Planning Inspectorate can allow a longer period for giving notice of an appeal, but they will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Planning Inspectorate need not consider an appeal if it seems that we could not have granted planning permission for the proposed development or could not have granted it without the conditions imposed, having regard to the statutory requirements, to the provisions of the development order and to any directions given under the order.

The Planning Inspectorate does not normally refuse to consider appeals solely because we based our decision on a direction given by them.

Purchase Notices

If either the Council or the Planning Inspectorate refuses permission to develop land or grants it subject to conditions, the owner may claim that neither the land can be put to a reasonably beneficial use in its existing state, nor can the land be rendered capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

If this happens, the owner may serve a purchase notice on the Council. This notice will require the Council to purchase their interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990 (as amended).

Comment

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mr Anthony Hazell (1188986)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Anthony Hazell (1188986)
Comment ID	PLPP20
Response Date	22/11/18 12:11
Consultation Point	Policy H12: Rural exceptions sites (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H12
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

An **objection** is made in regard to **Policy H12** on rural exceptions sites. This broadly mirrors the current adopted policy but omits the previous requirement that the development should not harm the function or integrity of the Green Belt. It is important that substantial weight is given to any harm to the Green Belt (in line with rNPPF para 144) and as such this test should be included (albeit that the test of very special circumstances does not apply).

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Suggested amendments: include further criteria along the following lines:

“(e) the development would not harm the function or integrity of the Green Belt”

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Gaynor Gallacher (1191428)
Email Address	[REDACTED]
Company / Organisation	Highways England
Address	Ash House Falcon Road Exeter EX2 7LB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Highways England (Gaynor Gallacher - 1191428)
Comment ID	PLPP572
Response Date	03/12/18 12:24
Consultation Point	Policy I2: Improving accessibility and transport (View)
Status	Processed
Submission Type	Letter
Version	0.3
Files	I2-highways-england-Gallacher-PLPP572.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	I2
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No



For Office Use Only

Requester ID: 0031
 Consultee ID: 1191428
 Comment ID's: PLPP572

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	12
Policies map	
Paragraph number	243-244

2. Do you consider that the Local Plan is:

- | | | | | |
|---|-----|-------------------------------------|----|--------------------------|
| • Legally compliant | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| • Sound | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises a small section of the A35 to the west of Bere Regis, and a section of the A31 east of Bere Regis, in the north of the District. Highways England is keen to ensure that potential development sites take account of the need for transport and land use planning to be closely integrated and that the principles of sustainable travel are considered at an early stage prior to development. It is on the basis of these responsibilities that Highways England provides the following comments in relation to transport infrastructure provision.

Our comments should be considered in the light of previous responses, specifically at the Issues and Options stage (9 March 2015), Preferred Options (20 July 2016), our contributions to the evolving Bere Regis Neighbourhood Plan and the 'New Homes for Purbeck' consultation in March 2018. Alongside this we have been liaising closely with regards to the junction modelling to examine the impact of the proposed plan growth on the SRN.

In our previous responses, Highways England stated that the junctions on the SRN within Purbeck District are currently operating at or over capacity in peak periods, albeit not always with high levels of associated queuing and delay. It was also noted that junction operation is predicted to worsen by the end of the plan period (2033) and the addition of traffic associated with the local plan is expected to make conditions worse. As the proposed quantum of development within the Local Plan is similar to that considered by us as part of the 'New Homes for Purbeck' consultation, Highways England remains of this view. However, we also stated that, although the SRN is congested at peak times, the available evidence shows that the impact of the moderate level of development proposed within the Plan would not constitute a severe impact. On this basis, it is not considered necessary for the Plan to identify capacity enhancements or infrastructure on the SRN for the purpose of delivering this level of strategic growth, and this position is reflected within the Transport Background Paper that accompanies the Plan.

It should be noted however that there may still be a requirement for developers to carry out additional more detailed site specific transport appraisals when bringing sites forward, as part of the assessment of the traffic impact of their proposals and to identify any small scale highway improvements that may be necessary to mitigate the impact of their development.

(Please continue on a separate sheet if necessary)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

No changes proposed.

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

n/a

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature: **G Gallacher**
Digitally signed by G Gailacher
Date: 2018.11.27 13:56:37 Z

Date: **G Gallacher**
Digitally signed by G Gallacher
Date: 2018.11.27 13:57:10 Z

Comment

Consultee	Mr William Hill (1191265)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr William Hill (1191265)
Comment ID	PLPP559
Response Date	03/12/18 22:29
Consultation Point	Identifying a local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H1

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

2,688 homes is a nationally devised target that the majority of the local population does not understand or agree with. The requirement equates to an average of 168 homes per year, but the plan delivers much more than this in the first third. This front loading is against the desire of the local people who do not believe the policies will be adhered to, particularly on any real target for affordable homes. I

would like the planners and council to ensure the policies set out are met and properly implemented to regain the trust of local people. The speed of delivery should be in line with what is required by the community and not driven by commercial or developer criteria as at present. Priority should be given to homes for local people from the outset by undertaking the plans for smaller developments first. The larger developments can be left to the 2nd third of the plan when the shape of the future need is better known and can be better demonstrated; particularly to take in an increase in local employment. This also allows for at least one review of the plan and local needs before any of the more major developments are started.

The plan should be continually reviewed as promised, to show people they are being listened to and not ignored.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Revise the programme for building new homes to make the delivery of homes more even through the plan timescale and enable further review.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

To make the case for a change of delivery programme.

Comment

Consultee	Mr Rob Holden (1189740)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Rob Holden (1189740)
Comment ID	PLPP293
Response Date	03/12/18 10:28
Consultation Point	Policy V2: Green belt (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Endorsement from Stephen Whale, Barrister, Landmark Chambers, 1 December 2018 (1) Endorsement from Stephen Whale, Barrister, Landmark Chambers, 1 December 2018
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	V2
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The premise for Policy V2 as currently drafted appears to be that the removal of land from Green Belt will allow new houses to be delivered (see paragraph 46 of the accompanying text, although contrast paragraph 48 which refers simply to the enlargement of existing settlements without reference to housing delivery).

However, there is nothing in the wording of draft Policy V2 to indicate that the rationale for amending the Green Belt boundaries is housing delivery or settlement enlargement. Moreover, notwithstanding draft Policy V1 and its allocation of sites for housing, there is nothing in Policy V2 (or, for that matter, the Presubmission Local Plan more generally) to indicate that only applications for planning permission for housing development on the land removed from Green Belt will be granted planning permission. It follows that SANG creation (or SANG creation over and above that currently proposed) is not necessarily required.

What is more, the proposed amendment of the Green Belt boundary in Lytchett Matravers (as shown on the Policies Map and Lytchett Matravers Inset Map) is in parallel with a new SANG to the north-east of the settlement. This new SANG is also shown on the Policies Map and Lytchett Matravers Inset Map. This new SANG will not only offset the impact of removing land from the Green Belt as currently proposed by PDC, it will also offset the modest additional removal of land from the Green Belt now proposed as part of this consultation response (in the separate and accompanying response to the Policies Map).

It follows that the mandatory requirement for SANG creation (“...should be offset...”) is too stringent a test. It is not justified, in that it is an inappropriate strategy, it does not take into account the reasonable alternatives and it is not based on proportionate evidence. In short, Policy V2 as currently drafted is unsound.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Policy V2 should be re-worded.

Instead of “...should be offset with the creation...,” it should be re-worded to, “...should where necessary be offset with the creation...”

This re-wording reflects the representation above and would make Policy V2 sound.

If you have any supporting documents please upload them here.

Endorsement from Stephen Whale, Barrister, Landmark Chambers, 1 December 2018 (1)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Mr R Holden



1 December 2018

Dear Mr Holden

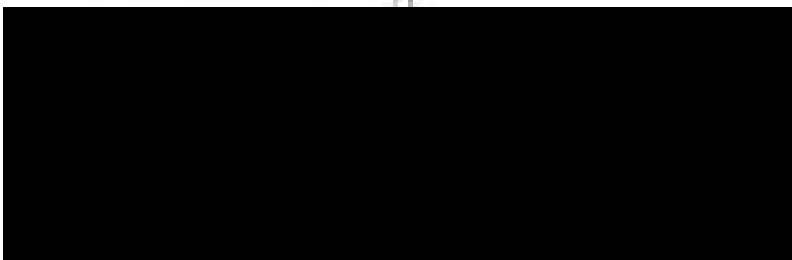
Purbeck Local Plan Pre-submission Draft

As you know, I had the benefit of a site visit to Lytchett Matravers on 26 November 2018. I was able to see for myself the character and features of the north-west corner of the settlement in the vicinity of Hill House and Jennys Lane.

I have also had an opportunity to analyse a range of documents produced by Purbeck DC since 2016, including extracts from the Green Belt Review June 2016, Brownfield Land Register Background Paper December 2017, Green Belt Background Paper January 2018, Strategic Green Belt Review January 2018 and the Green Belt Assessment of part of Lytchett Matravers sent to you on 6 November 2018. I have also had an opportunity to analyse the Purbeck Local Plan Pre-Submission Draft insofar as it is of concern to you.

In the light of my site visit and my analysis of the documentation, I am happy to endorse your representations as to the Purbeck Local Plan Pre-Submission Draft pertaining to Policy V2 and the Policies Map.

Yours sincerely,



Stephen Whale

Barrister

Mr R Holden



1 December 2018

Dear Mr Holden

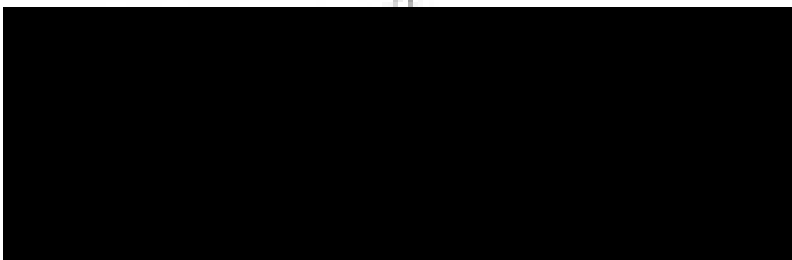
Purbeck Local Plan Pre-submission Draft

As you know, I had the benefit of a site visit to Lytchett Matravers on 26 November 2018. I was able to see for myself the character and features of the north-west corner of the settlement in the vicinity of Hill House and Jennys Lane.

I have also had an opportunity to analyse a range of documents produced by Purbeck DC since 2016, including extracts from the Green Belt Review June 2016, Brownfield Land Register Background Paper December 2017, Green Belt Background Paper January 2018, Strategic Green Belt Review January 2018 and the Green Belt Assessment of part of Lytchett Matravers sent to you on 6 November 2018. I have also had an opportunity to analyse the Purbeck Local Plan Pre-Submission Draft insofar as it is of concern to you.

In the light of my site visit and my analysis of the documentation, I am happy to endorse your representations as to the Purbeck Local Plan Pre-Submission Draft pertaining to Policy V2 and the Policies Map.

Yours sincerely,



Stephen Whale

Barrister

Comment

Consultee	Mr Rob Holden (1189740)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Rob Holden (1189740)
Comment ID	PLPP308
Response Date	03/12/18 10:56
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	Endorsement from Stephen Whale, Barrister, Landmark Chambers, 1 December 2018. Note two further supporting documents submitted on email to localplan@purbeck-dc.gov.uk Endorsement from Stephen Whale, Barrister, Landmark Chambers, 1 December 2018 (2) North West Lytchett Matravers Settlement Boundary Revision B.pdf North West Lytchett Matravers Settlement Boundary Revision A.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policies Map
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The proposed Green Belt boundary in Lytchett Matravers (especially in its north-west corner) is anomalous, in part it follows an indefensible boundary and it is inconsistent with prior PDC assessments.

In two places (at the very north and the very east of the settlement, respectively), the Lytchett Matravers Green Belt boundary "crosses the road" to incorporate residential development (existing and under construction).

There is a manifest inconsistency in that the proposed boundary should likewise cross Jennys Lane (in the north-west corner of the settlement) to incorporate residential development, but it is not presently proposed to do so.

The accompanying Green Belt Designation Anomaly plans (Revisions A and B) show how the Green Belt boundary in the north-west corner of Lytchett Matravers should be amended in order to remove a modest amount of land from Green Belt in addition to that currently being proposed for removal.

The two Revisions are in the alternative. Revision A is the principal proposed amendment (i.e. the Green Belt boundary should be amended to follow A-B-C-D-E-F-G-H-J rather than A-J). If PDC (or the examining inspector) is not minded to adopt Revision A, Revision B should be adopted in the alternative (i.e. the Green Belt boundary should be amended to follow T-U-V-W-X-Y-Z rather than T-Z).

The land proposed to be removed from Green Belt is not open. Government policy provides that, when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open (NPPF paragraph 139(b)). Given that the land proposed to be removed is not open, its removal from Green Belt meets this policy test whereas the current draft Policies Map for Lytchett Matravers does not.

The land proposed to be removed from Green Belt does not serve any of the five Green Belt purposes. There are 6 dwellings within the Revision A area, and 3 within the Revision B area. The revision areas also incorporate other built development (such as garage, swimming pool, tennis court, boundary wall, stables, workshop and hardstandings).

In its Green Belt Review June 2016, PDC correctly concluded that the land adjacent to The Rectory on Jennys Lane (i.e. the L-shaped area of grass pasture shaded green on Revision A, between The Rectory and Pigeon Plotte) did not serve any of the five Green Belt purposes and that an adjustment of the Green Belt boundary was suitable so as to remove it from Green Belt. PDC also correctly concluded that it would thus be sensible also to remove The Rectory from Green Belt in order to avoid an awkward boundary. In its Strategic Green Belt Review January 2018, PDC again correctly concluded that the land adjacent to The Rectory on Jennys Lane (i.e. the L-shaped area) did not fulfil any of the five Green Belt purposes and that it (along with The Rectory) was suitable for Green Belt removal. As part of this Review, PDC correctly concluded that the "small group of houses" dispersed across the south part of the parcel under consideration[1] (i.e. the small group including Hill House and neighbouring Chartley), "have some [negative] impact on openness."

If The Rectory and the L-shaped area of land adjacent to it are suitable for Green Belt removal and should be removed from it (as they are and should be), so should the balance of the land shown on Revision A. Indeed, the case for removing the balance of that land from Green Belt is even stronger than the case for removing the L-shaped area. The same goes for the Revision B land.

In its Brownfield Land Register Background Paper December 2017, PDC correctly concluded that the house, driveway, buildings and tennis court at Hill House on Jennys Lane are all brownfield and that, even though technically countryside, "its proximity to the village makes it difficult to argue against it forming part of the built-up area." Indeed, Hill House (and the other dwellings shown on Revisions A and B) plainly do form part of the built-up area of Lytchett Matravers. That fact is but a further reason to remove them from Green Belt. Paragraph 138 of the NPPF provides that, when drawing up or

reviewing Green Belt boundaries, plans should give “first consideration” to land which has been previously developed where it has been concluded (as PDC has concluded) that it is necessary to release Green Belt land for development. The draft Policies Map for Lytchett Matravers is inconsistent with this policy (as well as NPPF paragraph 137(a)), whereas Revisions A and B are consistent with it.

Residential density within the Revisions A-B areas is similar to (if not greater than) residential density on the southern side of Jennys Lane. The curtilages are likewise similar.

In its 6 November 2018 Green Belt assessment of an area in the north-west corner of Lytchett Matravers (covering land on both the north and south sides of Jennys Lane), PDC correctly concluded that “there are a number of similarities between the characteristics of the land to the north and south of Jennys Lane”. It found that the land on both sides of the road is in a similar position in relation to typical urban/sub-urban built development on High Street and Hopmans Close and that it includes large homes set back from the edge of the road in large gardens with generous gaps between neighbouring buildings. PDC acknowledged that its Townscape Character Appraisal for Lytchett Matravers recognises these similarities in character by categorising the homes on both sides of Jennys Lane as part of the same “low density residential” character area. PDC’s subsequent assertions in the same 6 November 2018 assessment as to differences between the north and south side cannot be reconciled with its earlier 2016-18 assessments, as recorded above. For example, PDC concluded on 6 November 2018 that more of the land on the north side is undeveloped with specific reference to the L-shaped field. But this is the self-same field which PDC has twice concluded is suitable for removal from Green Belt. Moreover, officers were somehow in paragraph 13 of the 6 November 2018 assessment “not satisfied that the site has an urban/sub-urban character justifying an enlargement of the settlement boundary” despite having just concluded (in paragraph 10) that the land on both sides of the road “is in a similar position in relation to typical urban/sub-urban built development on High Street and Hopmans Close” and having concluded less than a year before that Hill House’s proximity to the village “makes it difficult to argue against it forming part of the built-up area.” The finding in paragraph 14 that the L-shaped field “makes a positive contribution to the undeveloped character of the surrounding countryside” cannot be reconciled with the two prior findings that it makes no contribution to any of the five Green Belt purposes and is suitable for removal from it. The same paragraph does correctly concede that existing homes and other structures within the assessment area (tennis courts, hardstandings and swimming pools), “do harm the green belt openness”.

In short, the 6 November 2018 assessment is unfounded and inconsistent with PDC’s own prior assessments and conclusions. It is illogical to exclude the dwellings on the southern side of Jennys Lane from Green Belt but to include the 6 dwellings on the northern side. The premise of the 6 November 2018 assessment is also flawed, in that PDC elected to assess a much larger area than was appropriate (including dwellings not on Jennys Lane) whereas it should first have assessed a smaller area (such as the Revision B area), then a larger area (such as the Revision A area) and only then the area it elected to assess.

It is plain from all of the above that the draft Policies Map (and accompanying Lytchett Matravers Inset Map) is unsound. It has not been justified. It is an inappropriate strategy, which does not take into account reasonable alternatives and it is not based on proportionate evidence.

[1] Called Parcel 35.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The Policies Map (and accompanying Lytchett Matravers Inset Map) should be amended, such that the Green Belt boundary is as shown on Revision A (or, in the alternative, Revision B).

Revisions A-B are consistent with the strategy for meeting identified requirements for sustainable development. There would not give rise to any need to alter the Green Belt boundaries at the end of the plan period. They define the boundaries clearly. They use physical features (fencing, walls, road)

that are readily recognisable and likely to be permanent. Revisions A-B meet the relevant tests in NPPF paragraph 139. PDC is already providing for compensatory improvements to the remaining Green Belt (i.e. new SANG to north-east of Lytchett Matravers), and Revisions A-B do not give rise to a need for further compensatory improvement. Exceptional circumstances do exist to justify Revisions A-B.

If you have any supporting documents please upload them here.

Endorsement from Stephen Whale, Barrister, Landmark Chambers, 1 December 2018. Note two further supporting documents submitted on email to localplan@purbeck-dc.gov.uk

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

In order to explain and justify the proposed Revisions A-B in detail. The examining inspector should also undertake a site visit.

Mr R Holden



1 December 2018

Dear Mr Holden

Purbeck Local Plan Pre-submission Draft

As you know, I had the benefit of a site visit to Lytchett Matravers on 26 November 2018. I was able to see for myself the character and features of the north-west corner of the settlement in the vicinity of Hill House and Jennys Lane.

I have also had an opportunity to analyse a range of documents produced by Purbeck DC since 2016, including extracts from the Green Belt Review June 2016, Brownfield Land Register Background Paper December 2017, Green Belt Background Paper January 2018, Strategic Green Belt Review January 2018 and the Green Belt Assessment of part of Lytchett Matravers sent to you on 6 November 2018. I have also had an opportunity to analyse the Purbeck Local Plan Pre-Submission Draft insofar as it is of concern to you.

In the light of my site visit and my analysis of the documentation, I am happy to endorse your representations as to the Purbeck Local Plan Pre-Submission Draft pertaining to Policy V2 and the Policies Map.

Yours sincerely,



Stephen Whale

Barrister

Mr R Holden



1 December 2018

Dear Mr Holden

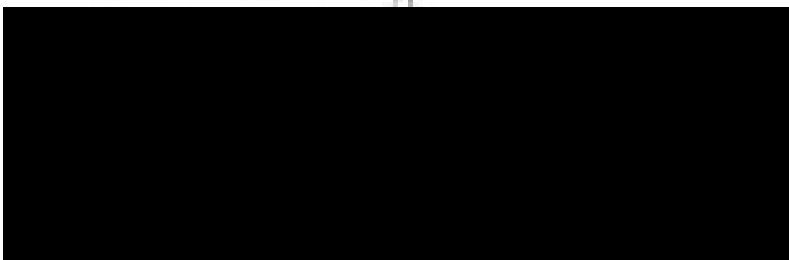
Purbeck Local Plan Pre-submission Draft

As you know, I had the benefit of a site visit to Lytchett Matravers on 26 November 2018. I was able to see for myself the character and features of the north-west corner of the settlement in the vicinity of Hill House and Jennys Lane.

I have also had an opportunity to analyse a range of documents produced by Purbeck DC since 2016, including extracts from the Green Belt Review June 2016, Brownfield Land Register Background Paper December 2017, Green Belt Background Paper January 2018, Strategic Green Belt Review January 2018 and the Green Belt Assessment of part of Lytchett Matravers sent to you on 6 November 2018. I have also had an opportunity to analyse the Purbeck Local Plan Pre-Submission Draft insofar as it is of concern to you.

In the light of my site visit and my analysis of the documentation, I am happy to endorse your representations as to the Purbeck Local Plan Pre-Submission Draft pertaining to Policy V2 and the Policies Map.

Yours sincerely,



Stephen Whale

Barrister

Mr R Holden



1 December 2018

Dear Mr Holden

Purbeck Local Plan Pre-submission Draft

As you know, I had the benefit of a site visit to Lytchett Matravers on 26 November 2018. I was able to see for myself the character and features of the north-west corner of the settlement in the vicinity of Hill House and Jennys Lane.

I have also had an opportunity to analyse a range of documents produced by Purbeck DC since 2016, including extracts from the Green Belt Review June 2016, Brownfield Land Register Background Paper December 2017, Green Belt Background Paper January 2018, Strategic Green Belt Review January 2018 and the Green Belt Assessment of part of Lytchett Matravers sent to you on 6 November 2018. I have also had an opportunity to analyse the Purbeck Local Plan Pre-Submission Draft insofar as it is of concern to you.

In the light of my site visit and my analysis of the documentation, I am happy to endorse your representations as to the Purbeck Local Plan Pre-Submission Draft pertaining to Policy V2 and the Policies Map.

Yours sincerely,



Stephen Whale

Barrister

North-West Lytchett Matravers, Green Belt Designation Anomaly



This Plan includes the following Licensed Data: OS MasterMap Colour PDF Location Plan by the Ordnance Survey National Geographic Database and incorporating surveyed revision available at the date of production. Reproduction in whole or in part is prohibited without the prior permission of Ordnance Survey. The representation of a road, track or path is no evidence of a right of way. The representation of features, as lines is no evidence of a property boundary. © Crown copyright and database rights, 2018. Ordnance Survey 0100031673

0m 25m 50m 75m 100m 125m 150m 175m 200m

Scale: 1:2500, paper size: A4

29 November 2018

REVISION A



North-West Lytchett Matravers, Green Belt Designation Anomaly



This Plan includes the following Licensed Data: OS MasterMap Colour PDF Location Plan by the Ordnance Survey National Geographic Database and incorporating surveyed revision available at the date of production. Reproduction in whole or in part is prohibited without the prior permission of Ordnance Survey. The representation of a road, track or path is no evidence of a right of way. The representation of features, as lines is no evidence of a property boundary. © Crown copyright and database rights, 2018. Ordnance Survey 0100031673

0m 25m 50m 75m 100m 125m 150m 175m 200m


Scale: 1:2500, paper size: A4

29 November 2018

REVISION B



Comment

Consultee	Mrs Sue Green Home Builders Federation (996484)
Email Address	
Company / Organisation	Home Builders Federation Ltd
Address	C/O 80 Needlers End Lane Warwickshire CV7 7AB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Home Builders Federation Ltd (Mrs Sue Green Home Builders Federation - 996484)
Comment ID	PLPP439
Response Date	03/12/18 16:34
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Purbeck Local Plan pre submission consultation 3 December 2018.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

See attachments

If you have any supporting documents please upload them here.

Purbeck Local Plan pre submission consultation 3 December 2018.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

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

SENT BY E-MAIL ONLY TO
localplan@purbeck-dc.gov.uk

3 December 2018

Dear Sir / Madam

PURBECK LOCAL PLAN PRE-SUBMISSION CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and in due course appear at the Local Plan Examination Hearing Sessions to discuss these matters in greater detail.

Duty to Co-operate

As set out in the 2018 National Planning Policy Framework (NPPF) the Purbeck Local Plan should be positively prepared and provide a strategy which as a minimum seeks to meet local housing needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). To fully meet the legal requirements of the Duty to Co-operate Purbeck District Council should engage on a constructive, active and on-going basis with other Eastern Dorset Housing Market Area (HMA) authorities to maximise the effectiveness of plan making. The Purbeck Local Plan should be prepared through joint working on cross boundary issues such as where housing needs cannot be wholly met within administrative areas of individual authorities. The meeting of unmet needs should be set out in a Statement of Common Ground (SoCG) signed by all respective authorities in accordance with the 2018 NPPF (paras 24, 26 & 27). If the Local Plan is to be deliverable over the plan period it should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG (2018 NPPF para 35c). One key outcome from co-operation between the authorities should be the meeting of housing needs in full. A key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with



strategic matters such as unmet housing needs when Local Plans are adopted. It is understood that Purbeck District Council will meet its own local housing needs in full. The SoCG between Local Planning Authorities in Dorset dated October 2018 shows a high likelihood of housing needs been unmet across the HMA (see Table 4). The Council should confirm that the other Eastern Dorset HMA authorities namely Bournemouth, Christchurch, East Dorset, North Dorset and Poole are meeting their own housing needs in full so that no unmet needs arise across the HMA. Unless the Council provides further evidence on the resolution of this strategic matter the Purbeck Local Plan risks been found unsound by its ineffectiveness in deferring rather than dealing with identified housing needs (para 35c).

Housing Need & Housing Requirement

As set out in the 2018 NPPF the determination of the minimum number of homes needed should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In summary the standard methodology comprises (revised NPPG ID 2a-004) :-

- Demographic baseline based on annual average household growth over a 10 year period ;
- Workplace-based median house price to median earnings ratio ;
- Adjustment factor = $\frac{\text{Local affordability ratio} - 4}{4} \times 0.25$;
- Local Housing Need = (1 + adjustment factor) x projected household growth.

Using this methodology based on 2014 household projections and 2017 affordability ratio, the Council has calculated Purbeck's local housing need as 2,688 dwellings (168 dwellings per annum) which is set out in 2018 SHMA Report. The Council is reminded that this is only the minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to the local housing need figure. The Government's objective of significantly boosting the supply of homes remains (para 59). It is important that housing need is not underestimated. Previously the 2015 SHMA identified an objectively assessed housing need of 238 dwellings per annum to support economic growth and vitality across the District. This higher figure included an uplift of 111 dwellings per annum based on the preferred Local Knowledge scenario in order to sustain a local workforce despite its ageing population. Without such an uplift the economic vitality of the District may be at risk. The 2018 SHMA also identified a significant affordable housing need of 149 dwellings per annum in the District representing 90% of the overall local housing need. It is noted that in Purbeck the median house price to median earnings ratio has increased from 4.75 in 1997 to 11.05 in 2017 which is higher than elsewhere in the South West and England. This means it is unaffordable for many local residents to buy or rent in the District.

Policy H1 : Local Housing Requirement proposes at least 2,688 dwellings (168 dwellings per annum) for the plan period of 2018 – 2034. As the Housing Delivery Test is measured against the lowest figure of either the local housing need or housing requirement the HBF encourages the Council to be more ambitious with the housing requirement figure set out in **Policy H1** in order to support economic growth and affordable housing delivery.

Currently the revised NPPG published in July 2018 confirms that during plan preparation local housing need figures should be kept under review and revised where appropriate. The local housing need figure calculated using the standard methodology may change when the Office of National Statistics (ONS) updates household projections (usually every 2 years) and affordability ratios (annually) and this should be taken into consideration by the Council (ID 2a-008 & 009). After submission of the Local Plan for examination the local housing need figure calculated using the standard methodology may be relied upon for 2 years (ID 2a-016). If the local housing need figure is re-calculated using the 2016 based projections and 2017 affordability ratio the resultant figure is higher (210 dwellings per annum). It is noted that this guidance may change on completion of the Government's latest consultation concerning the standard methodology which ends on 7th December 2018.

It is recommended that the Council re-considers its housing requirement figure before the Local Plan is submitted for examination.

Spatial distribution & Housing Land Supply (HLS)

As set out in the 2018 NPPF the strategic policies of the Local Plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The Council should have a clear understanding of land availability in the plan area by preparing a Strategic Housing Land Availability Assessment (SHLAA) which should be used to identify a sufficient supply and mix of housing sites taking into account availability, suitability and economic viability. The policies of the Local Plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (para 67). The identification of deliverable and developable sites should accord with the definitions set out in the 2018 NPPF Glossary. The Council should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The Local Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (paras 73 & 74).

Policy H2 : Housing Land Supply sets out an overall HLS of 2,688 dwellings comprising of :-

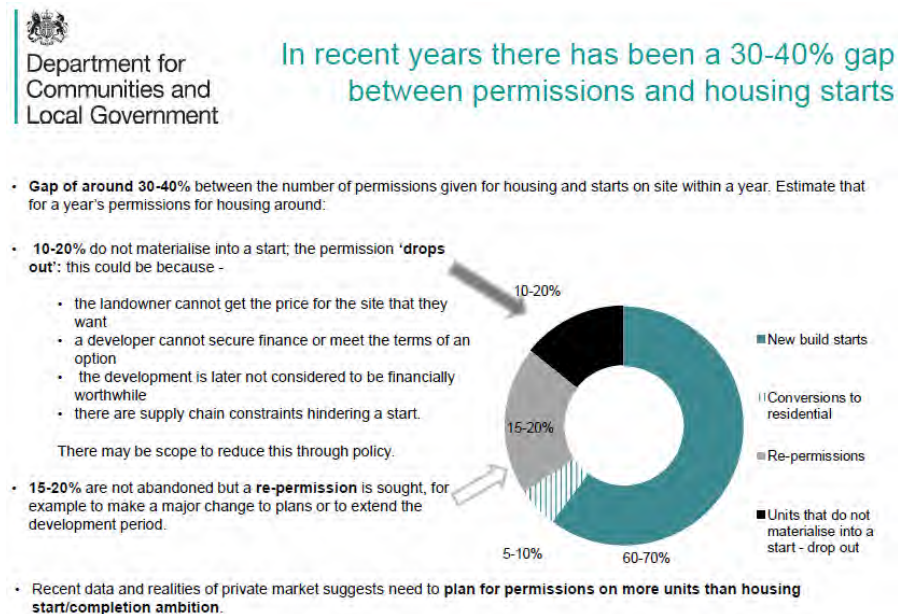
- 490 dwellings in Moreton Station / Redbridge Pit (1 site allocation in **Policy H4**) ;
- 470 dwellings in Wool (4 site allocations for 320 dwellings, 90 dwellings, 30 dwellings and 30 dwellings respectively in **Policy H5**) ;
- 150 dwellings in Lytchett Matravers (3 site allocations for 95 dwellings, 25 dwellings and 30 dwellings respectively in **Policy H6**) ;
- 90 dwellings in Upton (1 site allocation for 90 dwellings in **Policy H7**) ;
- 300 dwellings in Wareham Neighbourhood Plan ;
- 105 dwellings in Bere Regis Neighbourhood Plan ;
- 150 dwellings in Swanage Local Plan ;
- 933 dwellings from small sites next to settlements and windfall sites within settlements (**Policy H8 : Small sites next to existing settlements** and windfall allowance of 49 dwellings per annum).

When distributing housing across the District it is important to meet the housing needs of both urban and rural communities. Housing affordability is particularly acute in the District. The 2018 NPPF asserts that “*in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs*” (para 77) and concludes that “*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services*” (para 78). For the Council to maximize housing delivery the widest possible range of sites by both size and market location are required so that small local, medium regional and large national housebuilding companies have access to suitable land in order to offer the widest possible range of products. As advocated in the Housing White Paper (HWP) “*Fixing the Broken Housing Market*” a mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The HBF make no comments on the merits or otherwise of individually identified site allocations.

The Council’s proposed windfall allowance of 49 dwellings per annum should be based on compelling evidence that such sites have consistently become available in the past and will continue to do so. The Council should confirm that there is no double counting between the small sites next to existing settlements and windfall sites.

The Council’s overall HLS is the same as its local housing need therefore there is no flexibility in the Local Plan to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum ceiling or to provide with choice and competition in the land market. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but where a Local Plan or a particular settlement / locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. The HBF always suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the Local Plan Examination any of the Council’s

assumptions on lapse rates, windfall allowances and delivery rates are adjusted or any proposed housing site allocations are found unsound then any proposed contingency erodes. The Department of Communities & Local Government (DCLG) presentation slide from the HBF Planning Conference September 2015 (see below) illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “*the need to plan for permissions on more units than the housing start / completions ambition*”.



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

The HBF’s preferences for the calculation of 5 YHLS are the Sedgefield approach to shortfalls as set out in the NPPG (ID 3-035) with a 20% buffer applied to both the annualised housing requirement and any shortfall. As set out in the Housing Background Paper it is noted that the Council estimates that the 5 YHLS position based on its local housing needs figure is only 3.6 years. If the Council cannot demonstrate a 5 YHLS on adoption of the Local Plan nor maintain a 5 YHLS throughout the plan period then the Local Plan cannot be found sound.

Housing Policies

Policy H3 : New Housing Development Requirements

Under **Policy H3 Bullet Point (g)** the Council expects new housing development on allocated sites to include charging points for electric vehicles. This requirement should be fully justified by the Council including engagement with the main energy suppliers to confirm existing network capacity to accommodate any adverse impacts if all allocated dwellings have a re-charge facility. If re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary. The inclusion of £500 per dwelling allowance in the Council’s

viability testing may not cover significant infrastructure improvements resulting in an adverse impact on housing delivery. If electric vehicles are to be encouraged by the Government then a national standardised approach implemented through the Building Regulations would be more appropriate. The Council should be wary of developing its own policy and await the outcome of the Government's proposed future consultation to be undertaken by the Department of Transport later this year. It is recommended that **Bullet Point (g)** is deleted from **Policy H3**.

Policy H9 : Housing Mix

Under **Policy H9** on housing sites of 20 or more dwellings 5% of market dwellings will be offered for sale as serviced self build plots (**Bullet Point (a)**) and 10% as bungalows (**Bullet Point (b)**).

The 2018 NPPF sets out that housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (para 31). The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households rather than setting a specific housing mix on individual sites. The Council should ensure that suitable sites are available for a wide range of types of developments across a wide choice of appropriate locations.

The Council should clarify that the requirement for 10% market housing to be provided as bungalows has been included as a component of the housing mix tested in the Council's viability assessment.

The HBF is supportive of self / custom build for its potential additional contribution to the overall HLS but the Council's approach under this policy is only changing housing delivery from one form of house builder to another without any boost to housing supply. A policy requirement for 5% self / custom build serviced plots on housing sites of 20+ dwellings should be fully justified and supported by evidence of need. The Council should assess the demand from people wishing to build their own homes from data on its Self-build & Custom Housebuilding Register and other secondary sources (revised NPPG ID 2a-020). The Council should analyse the preferences of the 88 entries on the Register in June 2018 as often only individual plots in rural locations are sought as opposed to plots on housing sites of 20+ dwellings. There is a risk that self build plots will remain unsold therefore there should be a mechanism for reversion to the original builder in a timely manner and / or an appropriate deduction from the Council's housing trajectory. Before adopting this policy approach the Council should consider the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. The Council's viability evidence assumes no impacts

without providing any factual supporting evidence for this assumption. It is not clear if the Council has considered the loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. If these policy requirements cannot be fully justified by supporting evidence **Bullet Points (a) and (b) of Policy H9** should be deleted.

Policy H10 : Part M

Under **Policy H10** on sites of 10 or more dwellings 10% of dwellings must meet higher optional Building Regulation of Part M Category 2 accessible and adaptable homes. The Written Ministerial Statement (WMS) dated 25th March 2015 stated that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Council wishes to adopt the higher optional standard for accessible & adaptable homes then the Council should only do so by applying the criteria set out in the NPPG (ID 56-005 to 56-011). All new homes are built to Building Regulation Part M standards including many features that are of benefit to less able-bodied residents which are not available in the existing older housing stock. If the Government had intended that evidence of an ageing population alone justified adoption of the higher optional standards then such standards would have been incorporated as mandatory in the Building Regulations which the Government has not done. It is incumbent on the Council to provide a local assessment evidencing the specific case for Purbeck which justifies the inclusion of M4(2) and the quantum thereof in **Policy H10**. If this policy requirement cannot be fully justified by supporting evidence it should be deleted.

Policy H11 : Affordable Housing

As set out in the 2018 NPPF the Local Plan should set out the level and type of affordable housing provision required together with other necessary infrastructure but such policies should not undermine the deliverability of the Local Plan (para 34). The cumulative burden of policy requirements should be set so that most development is deliverable without further viability assessment negotiations (2018 NPPF para 57). Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development. The Harman Report highlighted that *“what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development”*. The Council’s viability evidence is set out in its Viability Report 2018.

Policy H11 requires on sites of 10 or more dwellings affordable housing provision of 40% on greenfield sites and 30% on brownfield sites. In Designated Rural Areas on sites of 2 – 9 dwellings affordable housing provision of 20% is required on both greenfield and brownfield sites. In the Designated Rural Areas

provision is for equivalent off-site financial contributions. The policy should clarify that such financial contributions are only payable on completion. As evidenced in the Council's Viability Report there should also be a differentiation between contributions for greenfield and brownfield land on sites of 2 – 9 dwellings.

Conclusion

For the Purbeck Local Plan to be found sound under the four tests of soundness as defined by the 2018 NPPF (para 35) the Plan should be positively prepared, justified, effective and consistent with national policy. The Local Plan is unsound (not positively prepared, unjustified, ineffective and inconsistent with national policy) because of :-

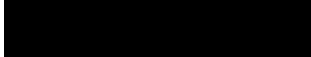
- an overly conservative housing requirement which will not support economic growth and delivery of affordable housing ;
- the lack of 5 YHLS on adoption and thereafter ;
- unjustified policy requirements for electric vehicle charging points on allocated housing developments (**Policy H3**), 5% self build serviced plots and 10% bungalows on sites of 20 or more dwellings (**Policy H9**) and 10% M4(2) homes on sites of 10 or more dwellings (**Policy H10**) ;
- no differentiation between greenfield and brownfield off site affordable housing contributions on sites in Designated Rural Areas.

It is hoped that the Council will consider these representations and amend the Local Plan before submission for examination. In the meantime if any further assistance or information is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**


Susan E Green MRTPI
Planning Manager – Local Plans

Comment

Consultee	Mrs Sue Green Home Builders Federation (996484)
Email Address	
Company / Organisation	Home Builders Federation Ltd
Address	C/O 80 Needlers End Lane Warwickshire CV7 7AB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Home Builders Federation Ltd (Mrs Sue Green Home Builders Federation - 996484)
Comment ID	PLPP444
Response Date	03/12/18 16:34
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Email
Version	0.12
Files	Purbeck Local Plan pre submission consultation 3 December 2018.pdf HBF-response.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

See attachments

If you have any supporting documents please upload them here.


Purbeck Local Plan pre submission consultation 3 December 2018.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Mrs Sue Green Home Builders Federation (996484)
Email Address	
Company / Organisation	Home Builders Federation Ltd
Address	C/O 80 Needlers End Lane Warwickshire CV7 7AB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Home Builders Federation Ltd (Mrs Sue Green Home Builders Federation - 996484)
Comment ID	PLPP445
Response Date	03/12/18 16:34
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Purbeck Local Plan pre submission consultation 3 December 2018.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

See attachments

If you have any supporting documents please upload them here.

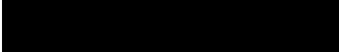
Purbeck Local Plan pre submission consultation 3 December 2018.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Mrs Sue Green Home Builders Federation (996484)
Email Address	
Company / Organisation	Home Builders Federation Ltd
Address	C/O 80 Needlers End Lane Warwickshire CV7 7AB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Home Builders Federation Ltd (Mrs Sue Green Home Builders Federation - 996484)
Comment ID	PLPP446
Response Date	03/12/18 16:34
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	Purbeck Local Plan pre submission consultation 3 December 2018.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

See attachments

If you have any supporting documents please upload them here.


Purbeck Local Plan pre submission consultation 3 December 2018.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Mrs Sue Green Home Builders Federation (996484)
Email Address	
Company / Organisation	Home Builders Federation Ltd
Address	C/O 80 Needlers End Lane Warwickshire CV7 7AB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Home Builders Federation Ltd (Mrs Sue Green Home Builders Federation - 996484)
Comment ID	PLPP448
Response Date	03/12/18 16:34
Consultation Point	Policy H10: Part M of the Building Regulations (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Purbeck Local Plan pre submission consultation 3 December 2018.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

See attachments

If you have any supporting documents please upload them here.

Purbeck Local Plan pre submission consultation 3 December 2018.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Mrs Sue Green Home Builders Federation (996484)
Email Address	<div style="background-color: black; width: 100%; height: 1em;"></div>
Company / Organisation	Home Builders Federation Ltd
Address	C/O 80 Needlers End Lane Warwickshire CV7 7AB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Home Builders Federation Ltd (Mrs Sue Green Home Builders Federation - 996484)
Comment ID	PLPP449
Response Date	03/12/18 16:34
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Purbeck Local Plan pre submission consultation 3 December 2018.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

See attachments

If you have any supporting documents please upload them here.

Purbeck Local Plan pre submission consultation 3 December 2018.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	MISS SARAH JACKSON (1188796)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	MISS SARAH JACKSON (1188796)
Comment ID	PLPP216
Response Date	01/12/18 19:46
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H14

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Do we have a housing crisis or not?

The second homes policy was a welcomed addition to the plan and was included after PDC received complaints in the 2015 and 16 consultations that the plan did not address the problems associated by high numbers of second homes and holiday lets. However, whilst the policy appears to address the issue of second homes, it does not go far enough to protect us against the impact of holiday lets on our communities. Indeed, the council is contradicting itself by consistently telling us that we 'need new homes' but equally is not willing to ensure that new homes are not taken out of the local availability because they become empty due to being used as holiday lets. However, in 3.10 [second homes policy evidence paper] the council states that '*the Council will further explore its options in ensuring that all homes, both market and affordable are restricted to permanent residents*'. This statement is more akin to the initial second homes evidence paper 2017 which promoted a full residency policy but unfortunately the council have ignored this advice and settled for this half hearted attempt.

It should be noted that in general, the public do not differentiate between second homes and holiday lets. They see a property that is not in full residency and understand the impact of that in their community.

The council have stated that holiday lets offer some economic benefit to our local area, however, despite asking officers to produce evidence which supports that claim, none has been forthcoming to date. In fact, the anecdotal evidence from residents supports a full residency policy and the benefits of this far outweighs the councils claim of any economic benefit. In contradiction to item 5, [bullet point 3, second home evidence paper], small businesses currently qualify to receive full small business rate relief meaning that they don't contribute in any way to our local taxes and services and therefore don't contribute to the police, ambulance and fire brigade etc even though they have full use of the facilities.

All holiday lets are someone's second home but run as a business by individuals, who live outside of our area and predominantly out of county. This means that the majority of money earned leaves our area to be spent elsewhere or even, in some cases, abroad. There is a small amount of money paid out for cleaners but generally repair, heating, gardening services appear to be coming in from other areas and most often from large towns. There is no proof that holiday lets provide more than a marginal benefit to any community. I have heard it said that they are of equal benefit to other holiday makers. This is not true. We see that holiday lets have deliveries of food from major supermarkets and are, therefore, not dependant on local pubs and restaurants as is the case with holiday makers staying in hotels and B&Bs.

PDC have stated that other businesses claim that having holiday lets benefits their business all year round. We have asked to see the evidence which supports that claim. In reality, how can a property occupied between 20 – 35 weeks per year be more economically beneficial than somebody in permanent residency who may be away on holiday approx. 4 weeks per year?

Holiday lets and second homes do NOT contribute in any way to the sustainability of smaller communities as they damage social fabric and community cohesion of our settlements, including their contribution to a changing population profile. They are not here to contribute to the upkeep of the churches and graveyards, help with other jobs like cutting grass, war memorial maintenance, running the village hall, taking part in fetes, community events, support the school, shop or pub. The owners are not here to support the parish council or more importantly stand for election! Their absence means that an ever dwindling number of people are responsible for a lot of work and this is set to increase with forthcoming devolution plans!

It is ridiculous for the council to exclude holiday lets from this policy as per item 3.9 in the evidence background paper. 2nd homes and holiday lets 'behave' in the same way. Both are empty for significant and unpredictable periods during the year, both have absent owners, both cause the cost of housing to inflate because of potential earning possibilities and both have an impact on social cohesion. Not addressing the effect of holiday lets by making a full residency policy Purbeck wide, contributes to making our villages even more unsustainable than they already are and, of course, contributes further to an affordability issue because of potential earning capacity regardless of whether they're within or out of the AONB.

If the housing crisis is as the government claims then the only way to ensure sustainable development is to ensure that properties are subject to a full residency policy by disallowing the use of new houses as 2nd homes and holiday lets. Every step should be taken by the council to facilitate this and they should follow the example set by other councils, [eg St Ives H2 Full Time Principal Residency Policy] who have put the needs of their communities before profit of developers and land owners.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

In order to ensure that all housing built as a result of the government's perceived need, there must be a policy that requires full time residency on all new builds district wide. Failure to do so will make the plan a nonsense.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

I think that the written word doesn't often do justice to the concern felt by people who have bothered to go through this extremely difficult process of commenting. It is also an opportunity to ensure that the inspector has fully understood the relevant points and to answer any questions relating to this matter.

Comment

Consultee	MISS SARAH JACKSON (1188796)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	MISS SARAH JACKSON (1188796)
Comment ID	PLPP219
Response Date	01/12/18 21:54
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H11
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Who are we building for?

The real housing crisis is for genuinely affordable housing for rent and to buy. Item 164 [plan pre submission] indicates that '*almost 90% of the identified housing requirement*' is for affordable housing. Unfortunately, that item goes on to say that the maximum proportion of affordable housing that's achievable is only 40%. This means that a huge number of people will not be served by this plan, and a significant amount of development in our district will be inaccessible to local people and therefore pointless so who is it being built for.

The government definition of affordable housing is 80% of market value but there are many references throughout the plan document, housing background paper, second homes evidence paper and an LEP report 2017 that the government's definition of what's affordable is not affordable to the demographic expected to access it. The council knows [and have admitted] that the 'affordable' housing provision throughout Purbeck is for the most part unaffordable to the relevant demographic.

We're told that the average income in Purbeck stands at £22,500.00 pa. Even with a deposit, an individual would require a mortgage of approx. 12 times their income for a two bed AFFORDABLE dwelling. As mortgage providers generally only offer 3.5 times a household income, the demographic most in need will gain nothing from the plan.

The affordable rental market isn't much better. Depending on the landlord, a prospective renter is required to have 6 weeks deposit and undergo a number of credit checks, which cost the individual money and have to provide references. At 80% of market value, significant numbers of people find the alleged 'affordable' rental market is sufficiently out of reach as to make it impossible for them to consider moving to their own home.

The LEP published a document in 2017 [5.22, Dorset-Future Housing Provision] which stated that '*In terms of absolute affordability, the standard measure is the income required for an 80% mortgage to a maximum of 3.5 times annual wage. By this measure none of the median priced new build dwellings are affordable even in the least expensive parts of Dorset*'. With a median income of £30,727 pa ALL new build housing in Purbeck is unaffordable! In order to afford an 'affordable' flat there would need to be an income of approx. £59,886pa.

Whilst I understand the issue of affordability is a country wide problem and one currently and conveniently being ignored by central government, Purbeck has many designations, awards and world wide recognition. It is, therefore, very important that all developments ACTUALLY meet the needs of local people in real terms to ensure the sustainability and longevity of vibrant communities within our villages and towns without destroying our precious and economically important environment.

This plan cannot deliver what is actually needed.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The council has made provision for 10% social housing to come from the 40% 'affordable' provision on big sites. In order to ensure the delivery of genuinely affordable housing, the percentage of social housing required needs to rise to the full 40% of the affordable provision. In order to protect against developers reducing numbers of 'affordable' delivered, the council should write into the policy that affordable, in particular the social housing must be delivered first and not sidelined in order to improve profits. The evidence suggests that 90% of the housing number needs to be affordable thus it is our duty to make sure that as many genuinely affordable houses get delivered.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	MISS SARAH JACKSON (1188796)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	MISS SARAH JACKSON (1188796)
Comment ID	PLPP272
Response Date	02/12/18 21:37
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The content of the plan does not provide sufficient protection to the character and sense of place of West Lulworth Village. The small sites idea is problematic and with 933 dwellings to potentially be

allocated on small and windfall sites, it is very important that the consequences of small sites are understood and that steps are taken to protect our designated areas from pointless development.

The principal behind the idea is that small developments should be facilitated in villages which would not normally see organised development [ie NOT windfall]. The policy was to ensure some housing [paragraph 145] was delivered to a local community. However, in practice there are not enough guarantees to ensure that the relevant housing [genuinely affordable] is delivered.

Of all the small sites identified in the SHLAA, 26% are located in West Lulworth, this is hardly an equal distribution throughout the district. The cumulative effect of these sites will have a huge impact on the character of the village and I don't think that the council has been consistent in its approach when assessing these small sites. Sites across the district have been discounted because of their likely impact on the AONB, however, for some reason the sites in West Lulworth remain as suitable. This is puzzling as most are within or immediately adjacent to the AONB and/or our conservation area. In addition, site 0065 [SHLAA] has been discounted for those very reasons thus it is unacceptable that the same principal does not apply to the other sites.

H8 does lay out the requirements for development, however, whilst it is recognised that any development for these sites will be subject to planning scrutiny, the Plan, as currently worded [there is no proposals map for West Lulworth], is not sound as it does not provide sufficient protection to the character of the village.

As small sites are 30 dwellings or under, there is not sufficient protection to ensure that developers will honour the affordable requirement and this could mean that a small village has a development which offers nothing other than unaffordable market housing. The village will lose amenity but gain nothing. On sites of fewer than 11 dwellings the council will accept a financial payment to ensure viability of the development. However, this undermines the principal of small sites. The point is to deliver affordable housing to villages that would normally not have development other than 1 house windfall developments. This is really unacceptable as none of our villages need market housing but we do need some genuinely affordable developments bearing in mind that the average income in Purbeck is approx. £22,500 pa.

If small sites do not deliver genuinely affordable housing then paragraph 150 in the plan document, is only accurate in that development will help meet the district's development requirement [need is disputable!] but it will not enhance the vitality of existing rural communities especially if all new build is not subject to a FULL RESIDENCY POLICY meaning that any new development, market or affordable, could be lost to the holiday let industry. This is a particular problem in honeypot areas such as West Lulworth.

Finally, our infrastructure cannot support development without significant investment from the service providers. We know that developers have to install infrastructure on site, however, the existing pipes, drains and electricity are at capacity and we regularly lose power, have road flooding and back surges through the drains when it rains heavily.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

I would hope that the inspector requires the council to insert a proposals map of West Lulworth which ROBUSTLY protects the character of the existing village, the unique landscape of the village and the amenity of existing properties. Without it the plan cannot be said to be sound.

I think that having 26% of all small sites in West Lulworth is unacceptable and I would hope that the inspector would limit small sites development to a maximum of one small site per village to ensure that the rural nature of our villages is maintained.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

It is important that the inspector can gain further first hand information from villagers of West Lulworth as to the likely impact and infrastructure difficulties currently experienced.

Comment

Consultee	MISS SARAH JACKSON (1188796)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	MISS SARAH JACKSON (1188796)
Comment ID	PLPP275
Response Date	02/12/18 22:12
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	Legal compliance
--	------------------

Do you consider that the Local Plan is legally compliant?	No
--	----

Do you consider that the Local Plan is sound?	No
--	----

Do you consider that the Local Plan complies with the duty to co-operate?	Yes
--	-----

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Whilst the council has attempted to inform residents that various stages of the plan were open to consultation, the way in which those consultations were held disenfranchised huge numbers of people who either couldn't use a computer or found it very difficult to access the material.

In 2016 the system used to consult was not user friendly, the pathway to comment was not clear and once in the system, it kept crashing or freezing because there was so much information. I was responding for our Parish Council and we needed two laptops in order to access the info and eventually we had to complete a paper copy because we simply couldn't do it on line. There were many complaints of the program being too difficult to use, even by tech savvy people.

The council promised us that they'd never use that program again and yet this consultation is the same company. This consultation has been hideous. The platform has crashed numerous times. For a while there was a 404 error message and people were commenting that they couldn't get in. Again once in it wasn't clear how to navigate the page and loads of people gave up. Some were lucky enough to get paper copies which again was not made know and we found out by chance.

In addition to the above, the council decided to operate a paper consultation for the February 2018 consultation. This was a welcomed relief, however, they posted ONE copy per household and DID NOT explain that further copies could be acquired from the consultant. At a briefing held at the council building at the end of January, a parish councillor questioned the 1 per household policy and pointed out that it should have been one per voting adult. The officer reluctantly said that further copies could be acquired IF there was a general dispute between householders that required a separate form. This was not true. A public consultation is exactly that and the public were led to believe that they couldn't reply individually. We told as many people as possible but the consultants ran out of forms so there were delays for some people.

Equally by sending out specific and identifiable forms, the general public ie across the country could not respond to this alleged public consultation. As the forms were house specific there were not any located in libraries or public offices where a non resident could pick one up and comment.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

I can't offer a suggestion as I don't know what the scope of the inspector is.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Paul Johns (1187712)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Paul Johns (1187712)
Comment ID	PLPP135
Response Date	29/11/18 23:09
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? All policies

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?

No

Comment

Consultee	Mrs Constance Johns (1184360)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Constance Johns (1184360)
Comment ID	PLPP136
Response Date	30/11/18 00:22
Consultation Point	Policy V2: Green belt (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? All policies

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?

No

Comment

Consultee	Mr Stuart Johnson (1186956)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Stuart Johnson (1186956)
Comment ID	PLPP440
Response Date	03/12/18 16:35
Consultation Point	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	E11
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The plan gives insufficient consideration to the drainage into the Frome from the rising land to the South of Wool. The old name Wyllen indicates the still current number of springs that occur after heavy rain. The lack of agricultural land to soak/delay run-off will place a further stress on the River Frome.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Consider alternative sites

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Stuart Johnson (1186956)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Stuart Johnson (1186956)
Comment ID	PLPP465
Response Date	03/12/18 16:46
Consultation Point	Foreword (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 12

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The consideration of transport issues regarding the level crossing at Wool is superficial, and takes no account that development to the West of the crossing will be mainly a feeder area for the large conurbations to the East (Poole and Bournemouth)

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Although DIP is seen as an employment development opportunity, this remains unproven, and given the lack of success of previous initiatives to develop the site as a technology park, it cannot be presumed to be the main employer for developments in Wool. The mitigation is to concentrate development closer to extant centres of employment exist.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Stuart Johnson (1186956)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Stuart Johnson (1186956)
Comment ID	PLPP469
Response Date	03/12/18 16:54
Consultation Point	Foreword (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 12

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The plan gives inadequate consideration to the restriction to traffic caused by the A352 level crossing at Wool. Although a survey has been made, it fails to recognise that the major employers of residents in the development at Wool will be located in the Poole and Bournemouth areas, on the other side of

the crossing. The detriment to the environment due to vehicle pollution has not been adequately considered, let alone the expenditure on petrol and diesel for the foreseeable future.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The plan should re-examine the transport issues, with a view to locating development closer to the major centres of employment. It is recognised that DIP is a long term potential employer locally, but experience of initiatives over the last 25 years (starting at Winfrith Technology Centre, and others ad nauseam) gives little confidence that this will be the solution

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Nickie Johnson (1186993)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Nickie Johnson (1186993)
Comment ID	PLPP258
Response Date	02/12/18 18:38
Consultation Point	Policy IM1: Tools for delivery - the Purbeck Local Plan implementation strategy (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	IM1
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

'Tools for delivery - the Purbeck Local Plan implementation strategy' The NPPF states that 'developer contribution policies should not make development inviable' hence point b in this policy. The Council will 'consider external or alternative sources of funding etc....' This policy is far from robust. In the

large housing allocations for Wool and Moreton much infrastructure e.g. schools, surgeries, transport, highway improvements will be needed. In their own admission the Council has said that it is unlikely that any developer will fund such infrastructure needs so the burden will fall upon the Council to meet the need. However, grants and funding is also unlikely so the money will come from the public purse which again will not be forthcoming in large enough sums. Therefore the settlements in question will have houses with no infrastructure to the detriment of new and existing residents. What is needed is a firm policy to ensure that developers/landowners who stand to make millions from these developments pay the appropriate monies. In Wool there is a development of 180 houses now approximately 10years old the highways of which have yet to be adopted by the County Council as the developer has not brought these up to standard although this would have been part of their original remit.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

As above: A robust policy is necessary which holds developers to account and guarantees the correct infrastructure.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Nickie Johnson (1186993)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Nickie Johnson (1186993)
Comment ID	PLPP259
Response Date	02/12/18 18:39
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? paragraph 84

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Dorset Heathlands para.84.....'Suitable Alternative Natural Greenspace (SANG) provide new areas of public open space that are convenient and dog friendly.... The SANG at Coombe Wood for the proposed development of 470 houses at Wool does not fulfil this remit. It is not a new area of public space. This area of Ancient Woodland (an irreplaceable habitat) already has several public footpaths

and bridleways running through it. It is already used extensively by dog walkers, horse riders and ramblers. One section follows the old drove route from Winfrith Newburgh to E.Lulworth and is therefore an ancient right of way.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

A site of Suitable Alternative Natural Green Space should be designated on land that is within walking distance of the proposed developments and is if possible man-made with features that attract all households e.g. a park!

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Nickie Johnson (1186993)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Nickie Johnson (1186993)
Comment ID	PLPP260
Response Date	02/12/18 18:40
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H1

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

'Local Housing Requirement' '...work with emerging/future neighbourhood plans to determine housing requirement for the designated area'. How does this policy work when the housing 'requirement' has already been laid down in the Local Plan and a neighbourhood plan cannot have fewer houses than those figures. If the requirement e.g. need is proven to be less than the numbers set, say through a

Parish Housing Needs Survey (the latest one for Wool gave a figure of 50 households in need), to which number will this policy adhere? If there is a commitment to determine housing requirement or need (requirement is surely a need not an aspiration) which figure will the Council use? The Local Plan or the actual evidenced requirement or need?

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The policy must clarify what is meant by 'determining housing requirement'

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Nickie Johnson (1186993)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Nickie Johnson (1186993)
Comment ID	PLPP261
Response Date	02/12/18 18:40
Consultation Point	Policy I1: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? I1

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Developer Contributions to deliver Purbeck's Infrastructure. This policy is unsound as S106 and CIL will not deliver infrastructure directly to the large developments at Wool and Moreton. Under the present system S106 agreement monies are not delivered directly to the village where the development takes

place but are put in a 'communal' pot to be used to mitigate the effects of development county wide whilst at the same time delivering nothing to the village itself. The emerging CIL (Draft charging schedule and priorities for spending, Oct.2018, consultation ends 03/12/18) considers that there is no need for CIL payments to be levied on the housing developments in Wool. This is unfortunate as combined with the present S106 policies this will mean that no monies will come directly to the village from any development. Whereas windfall and small sites in Swanage benefit from a charge of £180 per dwelling to fund the railway link. This is surely an unsound and unjust policy which leaves villages set to double their populations with no direct access to funding.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

My next task is to reply to the CIL consultation before the deadline and recommend a more even handed approach to CIL payments.

Comment

Consultee	Mrs Nickie Johnson (1186993)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Nickie Johnson (1186993)
Comment ID	PLPP262
Response Date	02/12/18 18:41
Consultation Point	Policy I1: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? I1

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Developer Contributions to deliver Purbeck's Infrastructure. This policy is unsound as S106 and CIL will not deliver infrastructure directly to the large developments at Wool and Moreton. Under the present system S106 agreement monies are not delivered directly to the village where the development takes

place but are put in a 'communal' pot to be used to mitigate the effects of development county wide whilst at the same time delivering nothing to the village itself. The emerging CIL (Draft charging schedule and priorities for spending, Oct.2018, consultation ends 03/12/18) considers that there is no need for CIL payments to be levied on the housing developments in Wool. This is unfortunate as combined with the present S106 policies this will mean that no monies will come directly to the village from any development. Whereas windfall and small sites in Swanage benefit from a charge of £180 per dwelling to fund the railway link. This is surely an unsound and unjust policy which leaves villages set to double their populations with no direct access to funding.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

My next task is to reply to the CIL consultation before the deadline and recommend a more even handed approach to CIL payments.

Comment

Consultee	Mrs Anne Jones (1190102)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Anne Jones (1190102)
Comment ID	PLPP72
Response Date	28/11/18 17:15
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H14 183 184

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I live in West Lulworth where there is already a very high concentration of second homes. I have lived in the village for nearly forty years and in that time I have seen a steady rise in the number of second homes, and a steep rise in the price of houses. Any new development would not help local people who want to live and work in the community as the prices are likely to be too expensive. The high

proportion of homes that are unoccupied for lengthy periods in the year has a detrimental impact on the local community and its organisations and facilities.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

A " St Ives" style policy is required to control second home blight.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Brenda Jones (1190725)
Address	[REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Brenda Jones (1190725)
Comment ID	PLPP144
Response Date	30/11/18 15:48
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Other
Version	0.3
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
Which policy / paragraph number / policies map does your comment relate to?	Policy H5
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The number planned for is unjustified - how has the number been calculated. The houses aren't affordable for locals and not sure we can justify the amount of houses as its unclear where the need originates from other than from government targets.

The traffic from Purbeck Gate has increased noticeably and its worrying about the amount of cars that may result from the new proposed developments. Especially down near the railway crossing. There

have been many near misses and traffic accidents there. Especially travelling from Wareham into Wool. The traffic junction coming from the Spar and crossing the railway line has caused many near misses.

Parking is also an issue. Especially due to increased number in the school. There is no specified spaces and it becomes dangerous at drop off and pick up times. Also where will the children go to school?

The doctors surgery is already difficult to obtain an appointment at. The availability and care for the community could worsen as a result of more people.

The care bed was introduced at a late stage. Affordability of the private care that would be available is questionable. Would any spaces be available for older people on benefits and don't qualify for help with their fees or those unable to pay the fees?

When Purbeck Gate was built, we had sewerage come up into our house and issues with drainage. We are concerned about drainage and its capacity.

Flooding occurs on the Dorchester Road - is it suitable to build on this site? All sites are wet too, how is this suitable?

A few years ago, surface water flooding flowed down from the Coombe Wood area and flooded the allotments knee deep.

Consultations that have taken place haven't been very informative, no one seems to be able to clarify anything.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Dennis Jones (1189838)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Dennis Jones (1189838)
Comment ID	PLPP59
Response Date	28/11/18 11:19
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 182, 187

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I have lived in West Lulworth since 1979, nearly 40 years, and have seen a steady increase in the number of second homes or homes for rent as holiday lets. Some even advertise the fact that they are holiday homes in their windows. Any new houses in the village will add to this problem as they will be too expensive for locals and will be bought by outsiders wishing to retire here eventually.

Building more houses will add to Lulworth becoming even more of a theme park and less as a community. I live on Sunnyside in West Lulworth and after my children were born it was 18 years before another child was born on this lane.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

A St Ives style commitment to exclude "non residents" needs to be created.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Dennis Jones (1189838)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Dennis Jones (1189838)
Comment ID	PLPP61
Response Date	28/11/18 11:53
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 145-150

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The policies do not provide sufficient protection for high designation locations eg within the AONB. West Lulworth is being asked to deliver 107 units, approximately 25% of the housing needs on Purbeck, this is clearly unacceptable and will overwhelm the village which is part of the AONB . Apart from

issues of visual impact and infrastructure (eg one potential site for 18 houses can only be reached via a single track lane with no prospect of widening) there are implications for more second homes and infrastructure in a village that already sees regular traffic gridlock during the holiday season.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The policy "adjacent to villages" is not providing sufficient protection for high designation locations within an AOB and needs to be reconsidered.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Dennis Jones (1189838)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Dennis Jones (1189838)
Comment ID	PLPP626
Response Date	28/11/18 11:36
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H2
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Estimates of how many houses are required are greatly distorted by the second homes market such that a proportion of any new developments will inevitably become second homes or holiday lets. There are many examples of this in West Lulworth where numerous houses have been built over the years and are now holiday homes/lets which have a deleterious effect on the local community.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

I reappraisal of the numbers required. I would suggest that new builds, especially in Purbeck be restricted to bona fide "affordable" homes for local people who have a family connection with the area.

Comment

Consultee	Dr Dennis Jones (1189838)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Dennis Jones (1189838)
Comment ID	PLPP627
Response Date	28/11/18 11:36
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H2

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Estimates of how many houses are required are greatly distorted by the second homes market such that a proportion of any new developments will inevitably become second homes or holiday lets. There are many examples of this in West Lulworth where numerous houses have been built over the years and are now holiday homes/lets which have a deleterious effect on the local community.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

I reappraisal of the numbers required. I would suggest that new builds, especially in Purbeck be restricted to bona fide "affordable" homes for local people who have a family connection with the area.

Comment

Consultee	Mr Robert Jones (1190739)
Address	[REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robert Jones (1190739)
Comment ID	PLPP145
Response Date	30/11/18 16:09
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Other
Version	0.1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Comment

Consultee	Mr Robert Jones (1190739)
Address	[REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robert Jones (1190739)
Comment ID	PLPP146
Response Date	30/11/18 15:48
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Other
Version	0.3

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

The submission of Local Plan to the Secretary of State for Public Examination
 The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)
 The adoption of the Purbeck Local Plan

Which policy / paragraph number / policies map does your comment relate to? Policy H5

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The number planned for is unjustified - how has the number been calculated. The houses aren't affordable for locals and not sure we can justify the amount of houses as its unclear where the need originates from other than from government targets.

The traffic from Purbeck Gate has increased noticeably and its worrying about the amount of cars that may result from the new proposed developments. Especially down near the railway crossing. There

have been many near misses and traffic accidents there. Especially travelling from Wareham into Wool. The traffic junction coming from the Spar and crossing the railway line has caused many near misses.

Parking is also an issue. Especially due to increased number in the school. There is no specified spaces and it becomes dangerous at drop off and pick up times. Also where will the children go to school?

The doctors surgery is already difficult to obtain an appointment at. The availability and care for the community could worsen as a result of more people.

The care bed was introduced at a late stage. Affordability of the private care that would be available is questionable. Would any spaces be available for older people on benefits and don't qualify for help with their fees or those unable to pay the fees?

When Purbeck Gate was built, we had sewerage come up into our house and issues with drainage. We are concerned about drainage and its capacity.

Flooding occurs on the Dorchester Road - is it suitable to build on this site? All sites are wet too, how is this suitable?

A few years ago, surface water flooding flowed down from the Coombe Wood area and flooded the allotments knee deep.

Consultations that have taken place haven't been very informative, no one seems to be able to clarify anything.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Ms Helen Katsifli (1190859)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Helen Katsifli (1190859)
Comment ID	PLPP192
Response Date	01/12/18 14:22
Consultation Point	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H8 &H2
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I am writing to object to the proposed small sites development in West Lulworth. West Lulworth is a beautiful village with unique character and I believe that the current proposals do not provide sufficient

protection for the character of the village. IF the proposed developments take place it will be necessary to create vehicular access to these dwellings and other infrastructures will need to be put in place to support the dwellings which will ruin the character of West Lulworth.

In addition, West Lulworth, its surrounding hills, countryside and coastal areas including the cove, are areas of outstanding natural beauty. An assessment needs to be carried out of how these developments will impact the outstanding natural beauty of the village before any conclusions are drawn. Without such an assessment the proposed small sites developments should be halted.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

As mentioned above an assessment needs to be carried out on how the proposed developments will affect the character of the village and impact the outstanding natural beauty of the surrounding areas and coastal areas before any decisions are made on housing developments in West Lulworth.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr David Kennedy (1190878)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr David Kennedy (1190878)
Comment ID	PLPP221
Response Date	01/12/18 23:37
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Pre submission Purbeck local plan

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

It is legally compliant.

You have made it as difficult as you could to put off residents from making a comment on this Web site.

We have enough Housing in Purbeck as it is .

Let us hope the housing plans you have in Purbeck are the last for 30 years.

Purbeck is a area of outstanding natural beauty. It must be protected.

Poole/Bournemouth/Christchurch have plans for over 30,000 homes to be built in the next 20years.

That is plenty for local need's.

We must protect the green belt in Purbeck for future generations.

That is common sense.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr David Kennedy (1190878)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr David Kennedy (1190878)
Comment ID	PLPP690
Response Date	01/12/18 23:37
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Pre submission Purbeck local plan

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

It is legally compliant.

You have made it as difficult as you could to put off residents from making a comment on this Web site.

We have enough Housing in Purbeck as it is .

Let us hope the housing plans you have in Purbeck are the last for 30 years.

Purbeck is a area of outstanding natural beauty. It must be protected.

Poole/Bournemouth/Christchurch have plans for over 30,000 homes to be built in the next 20years.

That is plenty for local need's.

We must protect the green belt in Purbeck for future generations.

That is common sense.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr David Kennedy (1190878)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr David Kennedy (1190878)
Comment ID	PLPP700
Response Date	01/12/18 23:37
Consultation Point	Policy E1: Landscape (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Pre submission Purbeck local plan

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

It is legally compliant.

You have made it as difficult as you could to put off residents from making a comment on this Web site.

We have enough Housing in Purbeck as it is .

Let us hope the housing plans you have in Purbeck are the last for 30 years.

Purbeck is a area of outstanding natural beauty. It must be protected.

Poole/Bournemouth/Christchurch have plans for over 30,000 homes to be built in the next 20years.

That is plenty for local need's.

We must protect the green belt in Purbeck for future generations.

That is common sense.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr David Kennedy (1190878)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr David Kennedy (1190878)
Comment ID	PLPP701
Response Date	01/12/18 23:37
Consultation Point	Policy E1: Landscape (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Pre submission Purbeck local plan

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

It is legally compliant.

You have made it as difficult as you could to put off residents from making a comment on this Web site.

We have enough Housing in Purbeck as it is .

Let us hope the housing plans you have in Purbeck are the last for 30 years.

Purbeck is a area of outstanding natural beauty. It must be protected.

Poole/Bournemouth/Christchurch have plans for over 30,000 homes to be built in the next 20years.

That is plenty for local need's.

We must protect the green belt in Purbeck for future generations.

That is common sense.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP421
Response Date	03/12/18 15:47
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

3rd December 2018

Our ref: AB/4916

Dear Sir

Re: Purbeck Local Plan Review – Pre-Submission Draft Consultation – Ken Parke Planning Consultants

The following letter has been prepared in response to the Council's current consultation in respect of the Purbeck Local Plan Pre-Submission Draft which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery and management of development across Purbeck District from 2018-2034.

The following paragraphs respond to the Purbeck Local Plan Pre-Submission Draft strategy and make comment on the strategic allocations. Having regard for the fundamental determination to be made through the examination of the Local Plan, we also comment on the degree to which the plan which has been prepared is sound; in accordance with Paragraph 35 of the NPPF.

Housing – Chapter 4

Since the Council commenced with the preparation of the new Purbeck Local Plan, the Government has brought in to force the NPPF 2018. The revised NPPF now forms the overarching national policy framework, alongside Planning Practice Guidance (PPG). The Local Plan must be broadly in accordance with the direction of the NPPF in order to be found sound and capable of adoption. With the coming in to force of the NPPF the standard methodology for the calculation of housing needs now applies to all strategic plan making processes where Councils project that their plan will be submitted

for examination post January 2019. Plans submitted before this date will still be able to make use of the most up-to-date Strategic Housing Market Assessment (SHMA) data, in recognition of the fact that they have been in the midst of preparation and to avoid abortive work. Where Councils however propose to submit their plans post January 2019, any calculation of housing need should be based upon the standard methodology.

The Council has confirmed that it intends to formally submit its plan for examination between February and March 2019. Housing delivery within the plan period should thus be based on the standard methodology and any previous SHMA is of no relevance.

Housing Requirements – Policy H1

With reference to Chapter 4 of the Pre-Submission Document; Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take in to consideration the need for affordable housing.

This does not follow the direction of National Planning Policy which indicates that the standard methodology should form the basis for determination of housing need. Paragraph 002 of the Planning Practice Guidance (PPG) relating to 'Housing Needs' confirms that authorities are expected to follow the standard method in assessing local housing need. Paragraph 003 of the PPG confirms however that if Councils consider that circumstances warrant an alternative approach then they can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and any other method should only be used in exceptional circumstances.

It appears that the Council has sought to incorporate the standard methodology in to its SHMA 2018 updated in calculating its housing need, however this has based on a starting year of 2017 – as was the case at the time the Government released draft projections with the announcement of the standard methodology back in 2017 – as opposed to using the correct base year of 2018; being the current year and beginning of the Local Plan period. Planning Practice Guidance (PPG) states at Paragraph 004 of the 'Housing Need' section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Standard Methodology

Section 5 of the NPPF provides the Government's approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of **185 dwelling per annum**. This is the overarching capped figure for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,

- The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for 180 dwellings per annum and not the 168 dwellings per annum it is currently planning for. The result is a shortfall of **192 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

Housing Delivery – Policies H2, H8

Policy H2 provides the Council's delivery strategy for the 2,688 homes which are being planned for. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA 2018 and **1,225 dwellings** when compared with the actual needs for the District as calculated by the standard methodology.

The Council has made an allowance for, including the 100 windfall at Wareham, 1,033 dwellings to be delivered through a small sites policy and general windfall within existing settlements.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocation additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty for housing the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

The Council should seek to review and amend the Pre-Submission Draft Plan prior to its submission for examination.

Housing Trajectory

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly undersupply at the back end of the plan period. The precise delivery figures proposed are not clear however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded.

Housing Mix – Policy H9

The Council's housing mix policy is seeking to deliver mixed and balanced communities and provide the type and format off homes which it is suggested are required in accordance with its recent SHMA documents.

The Council as a result propose, at Policy H9 to place an obligation on all developments which deliver 20 or more homes to deliver; from the market housing provision:

- 5% as self-build plots; and,
- 10% as single storey homes.

This requirement places a significant and unreasonable expectation on all developers where sites would deliver this quantum of development without any regard for the site-specific circumstances, what is appropriate to local character and constraints and scheme viability. The Council state that if applications do not comply with this it will be necessary to demonstrate exceptional circumstances by way of a viability assessment confirming why this is the case; having regard for the viability evidence which has informed the Local Plan.

The Council has sought to justify this on the basis of the findings of the SHMA 2018. The SHMA demonstrated that there is a clear need for a mix of 2, 3 and 4 bedroom homes to meet market housing needs; being weighted more heavily towards three bedroom properties. In comparison for affordable units the mix also comprises some 1 bedroom homes and is weighted heavier towards two bedroom properties with a need for a much lesser number of 4 bedroom homes.

The Council also note from the SHMA evidence that there is a greater number, on average, of older residents within the Eastern Dorset Market Area; 27% when compared with the national average of 21%. Purbeck itself has closer to 30% of residents in the over 65 category. The Council as a result recognise a need for more housing for older persons.

Whilst there is clearly a need for more housing for older people it is not appropriate to mandate that single storey properties be provided on all sites of greater than 20 homes to deliver this aim; this has no regard for the location of the development in particular which is pertinent to whether this will (1) be attractive to this sector of the market and (2) whether it is the most appropriate location for such development having regard for the regular needs of this element of the population. Older persons housing should be directed more towards the principal settlements where there is close access to services and facilities, in particular shops, doctors, pharmacies and other day to day facilities which this section of the population rely more heavily on.

Whilst it is the case that specialist accommodation, delivered by the experienced market leaders in this sector, provides for a large element of the needs for this demographic of the population, it is recognised that more traditional housing in a non-communal environment also has its place in the

market. It is the case however that it should be developed intentionally as part of specific schemes rather than as an afterthought because it is mandated as part of applications by an overly restrictive housing mix policy.

The desire to provide housing for the older generation and lifetime homes is laudable, however there is a significant need for market housing for the wider populace, focussing on two, three and four bedroom homes, and a need to make efficient use of the land which stands to a degree opposite this. Many sites will clearly not be suitable for the delivery of single storey units, because they would be out of character or simply because that is not what would make best use of the site. The implications of single storey homes often being they require a considerably greater footprint compared to two storey dwellings and do not make best and most appropriate use of the land available.

To mandate the provision of self-build plots on schemes of this size where effectively, for a 20 units scheme, the Council would be seeking 1 self-build plot, is completely unworkable. Developers will not be willing to deliver this, and this would lead to piecemeal development within such sites at the risk of comprehensiveness. The provision of single self-build plots on sites which have otherwise been carefully considered to take account of their specific constraints and ensure appropriate amenity for neighbouring uses and proposed residents is not good planning. Effectively these plots would be constrained to a pre-determined outcome in any event and at which point is it simply the case that providing such plots would materially impact upon viability for the developer and deliver no real benefit to the person seeking to buy the self-build plot when what they can construct will not be materially different to what would have been built on the site in any event. It simply does not make any sense.

There is a place for self-build housing and it is on sites where the intention is to deliver solely this format of development; in the form of a site where landscaping and access are managed, and a design code is put in place for the development as a whole which provides a degree of flexibility but also a defined set of constraints. This represents positive and proactive planning. Singular or groups of two or three self-build plots will not provide positive planning outcomes.

It is not considered appropriate for the Council to seek to impose an overly restrictive housing mix policy which mandates certain formats of accommodation. The Council can appropriately suggest where the need for housing lies within the District, but to obligate this does not have represent good planning or the need to consider individual sites based on their own opportunities and constraints. Developers are instead likely to look to deliver 19 units on sites to avoid all of these constraints which defeats precisely the purpose of this policy. If the Council wants to seek the delivery of this format of development, it should direct this solely to its site allocations where greater

control can be had over the outcomes and meaningful numbers of these dwellings can be delivered.

The Council should strongly consider rewording this policy to place the obligation solely on allocated sites or remove this all together.

Building Regulations – Policy H10

Further to the Council's housing mix policy, it is also seeking to direct that Applicants on all sites which comprise major development, as defined by the Framework, provide at least 10% of new homes to meet the optional requirement of the Building Regulations in respect of accessibility – Category M4(2).

The Council expects this to be delivered on all sites unless site specific considerations mean this cannot be provided and in this case the Council expects a viability appraisal to be submitted to justify why the development cannot deliver this.

There are other significant considerations beyond viability which would indicate that this requirement cannot be applied; for example, flood risk and the desire to make development surface or fluvial flood resilient. The Council has had no regard for this in the construction of this policy and no stipulation is provided to remove the requirement in such circumstances.

In the case of an exceptional weather event even those areas which are not subject to any defined surface water or fluvial flood risk may be subject of an element of water ingress due to site specific circumstances such as ground levels. There are clear times when the provision of level access thresholds would not be acceptable, not because of the expense of constructing the buildings, but because it is not in the best interests of future residents and places the developer at additional risk and liability. This is something which should be determined by the Applicant, having regard for site specific circumstances and not something mandated by Local Policy.

With this provided as an option within the building regulations where developers are providing a format of accommodation where this would be desirable or beneficial it is completely superfluous to deal with this at the planning application stage and will only seek to constrain development which is completely acceptable in all respects.

Affordable Housing – Policy H11

The recently adopted National Planning Policy Framework (NPPF) imposes a new threshold for affordable housing. As the most up to date planning policy this supersedes the Ministerial Statement from 2014 which brought in to place

a 10-unit threshold with a gross floorspace limitation. The new threshold is based upon the statutory definition of Major Development; being proposals for 10 or more units or a site area of greater than 0.5ha.

The NPPF makes clear at Paragraph 63 that no affordable housing contributions should thus be required for residential developments that are not major developments; unless in designated rural areas where the LPA has adopted a lower threshold where contributions cannot be sought from developments of 5 units or fewer.

Policy H11 seeks to impose a 2 units threshold on sites where development which is not major is proposed. This is completely contrary to the NPPF and in no manner meets the tests of soundness in being consistent with National Policy.

There is absolutely no justification for this approach in any manner. The policy should be substantially reworded in this respect.

The Council is capable of adopting the lower threshold for affordable housing in designated rural areas where it will be capable of seeking contributions on sites of 6 or more units or where the site is over 0.5ha in area; as a result. The suggestion of a lower threshold however is completely unreasonable and unjustified.

Second Homes - Policy H14

The Council is seeking to follow the direction of Local Authorities such as Cornwall Council which have adopted a policy restricting the provision of second homes. The practicality however of implementing such a policy is however questionable.

The Council, through Policy H14, is seeking to impose planning conditions which will restrict the occupation of properties to only a person's sole or main residence in respect of applications for:

- The erection of new residential properties in the AONB;
- Change of use of existing buildings to residential;
- Replacement homes; and,
- The policy also applies on small sites in accordance with Policy H* and on rural exception sites.

The policy will result in some significantly odd outcomes, for example, where an existing property is occupied as a second home by the owner, they are unable to replace that building with a new dwellinghouse if they will continue to

occupy it. In gaining planning permission it would have a restriction placed upon it which would prevent them from being able to live in it.

In planning terms, they would be replacing one home, which they live in as a second home, with another which they would continue to occupy as a second home; with no material change in the use in any manner and where there would be no change in the availability of local housing stock at all. This makes absolutely no sense in planning terms at all and would not pass the test of reasonableness or necessity.

The purpose of the policy in effect is to ensure that new housing delivered is provided to meet local needs and persons from outside of the area are not buying up the housing stock which does not reduce overall needs and will potentially make affordability worse. The way to tackle this matter is not however through the imposition of an unreasonable and unenforceable condition, but rather to build more housing. The Council would be better served seeking to deliver additional housing development to take account of any issue in respect of second homes to ensure sufficient stock to meet the needs of local persons.

It is unclear why there needs to be a restriction in respect of rural exception sites as the criteria for the acceptability of such development is that there is an established local need which would be met. Persons will not be on the housing register if they already have a home which they would also retain; they may move to a new home which better addresses their needs criteria in terms of property size, or location, but they will then give up their other property. It is unclear why the policy includes this stipulation as a result; this makes little sense.

Chapter 6 – Infrastructure – Policy I1

Policy I1 of the Pre-submission Plan provides the Council's suggested approach to developer contributions.

The approach advocated appears highly irregular and confused with the Council seeking to on the one hand collect CIL contributions, but at the same time to seek contributions towards:

- Local transport;
- Health;
- Open space;
- Extension of GP facilities; and,

- Education.

By way of specific contribution to be secured by way of s106 agreement.

It is recognised that, in accordance with Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, the Council may seek site specific contributions in respect of development where it is necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind to the development. Such contributions should however be seeking to collect additional s106 contributions for matters which are included directly within CIL in respect of pooled infrastructure such as GP surgeries, education contributions, open space contributions and highways improvements which are not directly related to the site.

The Council appear to be seeking to 'double-dip' on contributions for these elements which is completely unjustified.

The policy should be reworded to state that site specific contributions may be sought where they meet the relevant tests of Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, however in all other circumstances will be secured by CIL. There is simply no justification for any other approach if the Council intends to continue to gather CIL.

Overall Soundness of the Local Plan Approach

Determining the soundness of a Local Development Plan is one of the principal roles for the examining Inspector at an EiP. 'Soundness' as a concept is defined within the NPPF by a series of tests, if these tests are met then the plan will be capable of being found sound; dependant on whether it meets the other tests of legal compliance and compliance with other relevant requirements such as the duty to co-operate, both of these aspects however fall within the realms of consideration of whether a plan is sound.

Paragraph 35 of the NPPF 2018 sets out the approach to the examination of Local Plans and whether they meet the legal and procedural requirements as enshrined within the legislation. The tests of soundness are clear, namely that a plan must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with National Policy.

Positively Prepared

To be positively prepared, a plan must be based on a strategy which as a minimum seeks to meet strategic level needs and be consistent with achieving sustainable development.

The fundamental point therefore is that strategic needs, such as for housing, must be met. Where a plan does not demonstrate that assessed needs will be met it will not be sound and will not achieve the aim of ensuring sustainable development.

The Council's proposed housing supply and distribution of development raises significant concerns in this respect; with the Council seeking to deliver a level of development below its needs as calculated by the standard methodology and placing a significant and unjustified reliance on the delivery of windfall development when instead certainty should be provided through the allocation of smaller and medium sites which confirm how and where the needs of the District will be met.

The Council should be seeking to allocate additional sites in order to make up for the shortfall in delivery identified and should, in accordance with the direction of the NPPF seek to allocate at least 10% of its supply on smaller and medium sites in order to ensure delivery in the initial years of the plan period. The Council has proposed a small sites policy which it considers can deliver such development however it would be more appropriate, particularly in Green Belt locations, for the Council to seek to formally allocate these sites to provide certainty for all parties.

The plan is not as a result positively prepared at this time and is in need of review and amendment prior to its submission for examination.

Justified

To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

It is essential to understand that housing delivery is best achieved through development at a range of scales; small, medium and large strategic scale. Placing reliance on only large strategic sites which are likely to have infrastructure requirements or other barriers to their delivery giving rise to significant delays in meeting objectively assessed needs for housing, is likely to guarantee that the needs in the earlier years of a plan period will not be appropriately met. Some development will inevitably come forwards through the vehicle of windfall, however the Council has made what it considers to be an

appropriate allowance for windfall in its housing trajectory and is still deficient on its housing numbers.

Whilst Paragraph 72 of the NPPF 2018 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages or towns, Paragraph 68 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. The new NPPF advocates Councils allocating at least 10% of their housing requirement on smaller sites of no larger than 1ha.

Clearly the Council has the opportunity here to allocate some sites capable of delivering less development which would still be of a significant scale having regard for the Council's housing supply. Leaving significant numbers of housing to speculative windfall provision is not reasonable or justified and does not represent good plan making.

Effective

For a plan to be effective it must be deliverable over the plan period, with appropriate consideration having been given to joint working and the duty to co-operate.

Whilst the plan has given consideration to the duty to co-operate with neighbouring authorities and this has been found not to be an option. It is not considered, for the reasons above that the local plan is effective in its current form. There are significant questions over the Council's housing trajectory in respect of the ability for the amount of development which is required to be delivered at the right time in the plan period, it is anticipated that the Council's strategic allocations will come forwards later than has been projected and will not deliver the quantum of development in the timescales which have been indicated. The Council has also provided insufficient justification for its approach to windfall development which will not ensure that the housing needs of the District are appropriately met.

It is not in this regard considered that the plan meets the tests of effectiveness in its current format, it is in need of alteration.

Consistent with National Policy

To be consistent in this respect the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

There are several overarching conflicts with the policies of the Local Plan Pre-submission Draft, as proposed, and the direction of National Policy.

The Council has not had appropriate regard for the NPPF in determining its approach to affordable housing which is not in any manner justified, it has also not had appropriate regard for the Framework in respect of its approach to securing developer contributions.

To meet the tests of soundness these policies will need to be significantly reworked.

Legal Compliance of the Plan – Sustainability Appraisal (SA)

The Council has provided the necessary evidence by way of a Sustainability Appraisal, with reference to a supporting documents library, to demonstrate that the legal requirements as set out within the Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment) Regulations (2004) have been met in preparing its Local Plan.

The fact that the Council may have undertaken the necessary assessment to demonstrate legal compliance with the SEA Regulations does not however in turn indicate that the plan strategy itself is sound. On the contrary however, failing to meet the necessary tests of legal compliance are sufficient to render a plan not sound and incapable of adoption.

The Council has sought to demonstrate that its proposed strategy is capable of meeting the tests of the SEA Regulations; however, this does not demonstrate this is the only or most appropriate strategy. In undertaking the Sustainability Appraisal (SA) the Council has had regard for opportunities for improvements to economic, social and environmental conditions as it is required to do, however it has not been conclusively demonstrated that these represent the most appropriate option. In this regard therefore whilst the legal tests of the SEA Regulations have been met this does not mean that the strategy is sound.

As discussed, it is not considered that the approach taken by the Council to the delivery of housing within the District results in the achievement of sustainable development at this time as it does not meet District's assessed housing needs in full and opportunities to spur delivery in the earlier years of the plan period instead of providing a shortfall have not been explored where reliance on windfall development could be reduced and more certainty provided.

Conclusion

Whilst there is no objection to the overarching strategy of the Purbeck Local Plan Pre-Submission Draft, there are clear and substantial failings which need to be addressed in respect of elements of the housing delivery strategy and also the wording and approach of specific policies in order to render the plan sound and capable of submission for examination.

Individual representations have been made on behalf of each of the parties whom we represent; having regard for their specific sites.

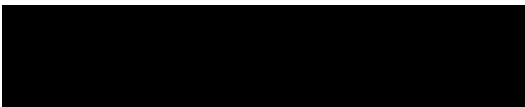
We have detailed on what grounds we object to the soundness of the plan and its compliance with the duty to co-operate. We have raised no objection in respect of the legal compliance of the plan; this itself is directly and intrinsically linked to its soundness, however we have raised issues in other regards which themselves are sufficient to render the plan unsound.

We ask that the individual representations made are considered by the Council and provided to the Inspector and that we have the opportunity to speak at the hearing sessions in respect of the matters raised.

For the purposes of clarity, we ask to be able to speak in respect of the policies of the Chapter 4 - Housing, as identified within this representation, at the Examination in Public of the Local Plan; should the EiP Inspector call hearing sessions in respect of these points.

Should the Council have any queries in relation to any of our Clients' land, please do not hesitate to contact us directly.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

Direct email:

Website:



www.kenparkeplanning.com

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP724
Response Date	03/12/18 15:47
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP725
Response Date	03/12/18 15:47
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP726
Response Date	03/12/18 15:47
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP727
Response Date	03/12/18 15:47
Consultation Point	Policy H10: Part M of the Building Regulations (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP728
Response Date	03/12/18 15:47
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP729
Response Date	03/12/18 15:47
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP422
Response Date	03/12/18 15:49
Consultation Point	Chapter 6: Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (1)
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 6 - infrastructure

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (1)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

3rd December 2018

Our ref: AB/4916

Dear Sir

Re: Purbeck Local Plan Review – Pre-Submission Draft Consultation – Ken Parke Planning Consultants

The following letter has been prepared in response to the Council's current consultation in respect of the Purbeck Local Plan Pre-Submission Draft which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery and management of development across Purbeck District from 2018-2034.

The following paragraphs respond to the Purbeck Local Plan Pre-Submission Draft strategy and make comment on the strategic allocations. Having regard for the fundamental determination to be made through the examination of the Local Plan, we also comment on the degree to which the plan which has been prepared is sound; in accordance with Paragraph 35 of the NPPF.

Housing – Chapter 4

Since the Council commenced with the preparation of the new Purbeck Local Plan, the Government has brought in to force the NPPF 2018. The revised NPPF now forms the overarching national policy framework, alongside Planning Practice Guidance (PPG). The Local Plan must be broadly in accordance with the direction of the NPPF in order to be found sound and capable of adoption. With the coming in to force of the NPPF the standard methodology for the calculation of housing needs now applies to all strategic plan making processes where Councils project that their plan will be submitted

for examination post January 2019. Plans submitted before this date will still be able to make use of the most up-to-date Strategic Housing Market Assessment (SHMA) data, in recognition of the fact that they have been in the midst of preparation and to avoid abortive work. Where Councils however propose to submit their plans post January 2019, any calculation of housing need should be based upon the standard methodology.

The Council has confirmed that it intends to formally submit its plan for examination between February and March 2019. Housing delivery within the plan period should thus be based on the standard methodology and any previous SHMA is of no relevance.

Housing Requirements – Policy H1

With reference to Chapter 4 of the Pre-Submission Document; Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take in to consideration the need for affordable housing.

This does not follow the direction of National Planning Policy which indicates that the standard methodology should form the basis for determination of housing need. Paragraph 002 of the Planning Practice Guidance (PPG) relating to 'Housing Needs' confirms that authorities are expected to follow the standard method in assessing local housing need. Paragraph 003 of the PPG confirms however that if Councils consider that circumstances warrant an alternative approach then they can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and any other method should only be used in exceptional circumstances.

It appears that the Council has sought to incorporate the standard methodology in to its SHMA 2018 updated in calculating its housing need, however this has based on a starting year of 2017 – as was the case at the time the Government released draft projections with the announcement of the standard methodology back in 2017 – as opposed to using the correct base year of 2018; being the current year and beginning of the Local Plan period. Planning Practice Guidance (PPG) states at Paragraph 004 of the 'Housing Need' section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Standard Methodology

Section 5 of the NPPF provides the Government's approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of **185 dwelling per annum**. This is the overarching capped figure for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,

- The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for 180 dwellings per annum and not the 168 dwellings per annum it is currently planning for. The result is a shortfall of **192 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

Housing Delivery – Policies H2, H8

Policy H2 provides the Council's delivery strategy for the 2,688 homes which are being planned for. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA 2018 and **1,225 dwellings** when compared with the actual needs for the District as calculated by the standard methodology.

The Council has made an allowance for, including the 100 windfall at Wareham, 1,033 dwellings to be delivered through a small sites policy and general windfall within existing settlements.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocation additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty for housing the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

The Council should seek to review and amend the Pre-Submission Draft Plan prior to its submission for examination.

Housing Trajectory

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly undersupply at the back end of the plan period. The precise delivery figures proposed are not clear however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded.

Housing Mix – Policy H9

The Council's housing mix policy is seeking to deliver mixed and balanced communities and provide the type and format off homes which it is suggested are required in accordance with its recent SHMA documents.

The Council as a result propose, at Policy H9 to place an obligation on all developments which deliver 20 or more homes to deliver; from the market housing provision:

- 5% as self-build plots; and,
- 10% as single storey homes.

This requirement places a significant and unreasonable expectation on all developers where sites would deliver this quantum of development without any regard for the site-specific circumstances, what is appropriate to local character and constraints and scheme viability. The Council state that if applications do not comply with this it will be necessary to demonstrate exceptional circumstances by way of a viability assessment confirming why this is the case; having regard for the viability evidence which has informed the Local Plan.

The Council has sought to justify this on the basis of the findings of the SHMA 2018. The SHMA demonstrated that there is a clear need for a mix of 2, 3 and 4 bedroom homes to meet market housing needs; being weighted more heavily towards three bedroom properties. In comparison for affordable units the mix also comprises some 1 bedroom homes and is weighted heavier towards two bedroom properties with a need for a much lesser number of 4 bedroom homes.

The Council also note from the SHMA evidence that there is a greater number, on average, of older residents within the Eastern Dorset Market Area; 27% when compared with the national average of 21%. Purbeck itself has closer to 30% of residents in the over 65 category. The Council as a result recognise a need for more housing for older persons.

Whilst there is clearly a need for more housing for older people it is not appropriate to mandate that single storey properties be provided on all sites of greater than 20 homes to deliver this aim; this has no regard for the location of the development in particular which is pertinent to whether this will (1) be attractive to this sector of the market and (2) whether it is the most appropriate location for such development having regard for the regular needs of this element of the population. Older persons housing should be directed more towards the principal settlements where there is close access to services and facilities, in particular shops, doctors, pharmacies and other day to day facilities which this section of the population rely more heavily on.

Whilst it is the case that specialist accommodation, delivered by the experienced market leaders in this sector, provides for a large element of the needs for this demographic of the population, it is recognised that more traditional housing in a non-communal environment also has its place in the

market. It is the case however that it should be developed intentionally as part of specific schemes rather than as an afterthought because it is mandated as part of applications by an overly restrictive housing mix policy.

The desire to provide housing for the older generation and lifetime homes is laudable, however there is a significant need for market housing for the wider populace, focussing on two, three and four bedroom homes, and a need to make efficient use of the land which stands to a degree opposite this. Many sites will clearly not be suitable for the delivery of single storey units, because they would be out of character or simply because that is not what would make best use of the site. The implications of single storey homes often being they require a considerably greater footprint compared to two storey dwellings and do not make best and most appropriate use of the land available.

To mandate the provision of self-build plots on schemes of this size where effectively, for a 20 units scheme, the Council would be seeking 1 self-build plot, is completely unworkable. Developers will not be willing to deliver this, and this would lead to piecemeal development within such sites at the risk of comprehensiveness. The provision of single self-build plots on sites which have otherwise been carefully considered to take account of their specific constraints and ensure appropriate amenity for neighbouring uses and proposed residents is not good planning. Effectively these plots would be constrained to a pre-determined outcome in any event and at which point is it simply the case that providing such plots would materially impact upon viability for the developer and deliver no real benefit to the person seeking to buy the self-build plot when what they can construct will not be materially different to what would have been built on the site in any event. It simply does not make any sense.

There is a place for self-build housing and it is on sites where the intention is to deliver solely this format of development; in the form of a site where landscaping and access are managed, and a design code is put in place for the development as a whole which provides a degree of flexibility but also a defined set of constraints. This represents positive and proactive planning. Singular or groups of two or three self-build plots will not provide positive planning outcomes.

It is not considered appropriate for the Council to seek to impose an overly restrictive housing mix policy which mandates certain formats of accommodation. The Council can appropriately suggest where the need for housing lies within the District, but to obligate this does not have represent good planning or the need to consider individual sites based on their own opportunities and constraints. Developers are instead likely to look to deliver 19 units on sites to avoid all of these constraints which defeats precisely the purpose of this policy. If the Council wants to seek the delivery of this format of development, it should direct this solely to its site allocations where greater

control can be had over the outcomes and meaningful numbers of these dwellings can be delivered.

The Council should strongly consider rewording this policy to place the obligation solely on allocated sites or remove this all together.

Building Regulations – Policy H10

Further to the Council's housing mix policy, it is also seeking to direct that Applicants on all sites which comprise major development, as defined by the Framework, provide at least 10% of new homes to meet the optional requirement of the Building Regulations in respect of accessibility – Category M4(2).

The Council expects this to be delivered on all sites unless site specific considerations mean this cannot be provided and in this case the Council expects a viability appraisal to be submitted to justify why the development cannot deliver this.

There are other significant considerations beyond viability which would indicate that this requirement cannot be applied; for example, flood risk and the desire to make development surface or fluvial flood resilient. The Council has had no regard for this in the construction of this policy and no stipulation is provided to remove the requirement in such circumstances.

In the case of an exceptional weather event even those areas which are not subject to any defined surface water or fluvial flood risk may be subject of an element of water ingress due to site specific circumstances such as ground levels. There are clear times when the provision of level access thresholds would not be acceptable, not because of the expense of constructing the buildings, but because it is not in the best interests of future residents and places the developer at additional risk and liability. This is something which should be determined by the Applicant, having regard for site specific circumstances and not something mandated by Local Policy.

With this provided as an option within the building regulations where developers are providing a format of accommodation where this would be desirable or beneficial it is completely superfluous to deal with this at the planning application stage and will only seek to constrain development which is completely acceptable in all respects.

Affordable Housing – Policy H11

The recently adopted National Planning Policy Framework (NPPF) imposes a new threshold for affordable housing. As the most up to date planning policy this supersedes the Ministerial Statement from 2014 which brought in to place

a 10-unit threshold with a gross floorspace limitation. The new threshold is based upon the statutory definition of Major Development; being proposals for 10 or more units or a site area of greater than 0.5ha.

The NPPF makes clear at Paragraph 63 that no affordable housing contributions should thus be required for residential developments that are not major developments; unless in designated rural areas where the LPA has adopted a lower threshold where contributions cannot be sought from developments of 5 units or fewer.

Policy H11 seeks to impose a 2 units threshold on sites where development which is not major is proposed. This is completely contrary to the NPPF and in no manner meets the tests of soundness in being consistent with National Policy.

There is absolutely no justification for this approach in any manner. The policy should be substantially reworded in this respect.

The Council is capable of adopting the lower threshold for affordable housing in designated rural areas where it will be capable of seeking contributions on sites of 6 or more units or where the site is over 0.5ha in area; as a result. The suggestion of a lower threshold however is completely unreasonable and unjustified.

Second Homes - Policy H14

The Council is seeking to follow the direction of Local Authorities such as Cornwall Council which have adopted a policy restricting the provision of second homes. The practicality however of implementing such a policy is however questionable.

The Council, through Policy H14, is seeking to impose planning conditions which will restrict the occupation of properties to only a person's sole or main residence in respect of applications for:

- The erection of new residential properties in the AONB;
- Change of use of existing buildings to residential;
- Replacement homes; and,
- The policy also applies on small sites in accordance with Policy H* and on rural exception sites.

The policy will result in some significantly odd outcomes, for example, where an existing property is occupied as a second home by the owner, they are unable to replace that building with a new dwellinghouse if they will continue to

occupy it. In gaining planning permission it would have a restriction placed upon it which would prevent them from being able to live in it.

In planning terms, they would be replacing one home, which they live in as a second home, with another which they would continue to occupy as a second home; with no material change in the use in any manner and where there would be no change in the availability of local housing stock at all. This makes absolutely no sense in planning terms at all and would not pass the test of reasonableness or necessity.

The purpose of the policy in effect is to ensure that new housing delivered is provided to meet local needs and persons from outside of the area are not buying up the housing stock which does not reduce overall needs and will potentially make affordability worse. The way to tackle this matter is not however through the imposition of an unreasonable and unenforceable condition, but rather to build more housing. The Council would be better served seeking to deliver additional housing development to take account of any issue in respect of second homes to ensure sufficient stock to meet the needs of local persons.

It is unclear why there needs to be a restriction in respect of rural exception sites as the criteria for the acceptability of such development is that there is an established local need which would be met. Persons will not be on the housing register if they already have a home which they would also retain; they may move to a new home which better addresses their needs criteria in terms of property size, or location, but they will then give up their other property. It is unclear why the policy includes this stipulation as a result; this makes little sense.

Chapter 6 – Infrastructure – Policy I1

Policy I1 of the Pre-submission Plan provides the Council's suggested approach to developer contributions.

The approach advocated appears highly irregular and confused with the Council seeking to on the one hand collect CIL contributions, but at the same time to seek contributions towards:

- Local transport;
- Health;
- Open space;
- Extension of GP facilities; and,

- Education.

By way of specific contribution to be secured by way of s106 agreement.

It is recognised that, in accordance with Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, the Council may seek site specific contributions in respect of development where it is necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind to the development. Such contributions should however be seeking to collect additional s106 contributions for matters which are included directly within CIL in respect of pooled infrastructure such as GP surgeries, education contributions, open space contributions and highways improvements which are not directly related to the site.

The Council appear to be seeking to 'double-dip' on contributions for these elements which is completely unjustified.

The policy should be reworded to state that site specific contributions may be sought where they meet the relevant tests of Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, however in all other circumstances will be secured by CIL. There is simply no justification for any other approach if the Council intends to continue to gather CIL.

Overall Soundness of the Local Plan Approach

Determining the soundness of a Local Development Plan is one of the principal roles for the examining Inspector at an EiP. 'Soundness' as a concept is defined within the NPPF by a series of tests, if these tests are met then the plan will be capable of being found sound; dependant on whether it meets the other tests of legal compliance and compliance with other relevant requirements such as the duty to co-operate, both of these aspects however fall within the realms of consideration of whether a plan is sound.

Paragraph 35 of the NPPF 2018 sets out the approach to the examination of Local Plans and whether they meet the legal and procedural requirements as enshrined within the legislation. The tests of soundness are clear, namely that a plan must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with National Policy.

Positively Prepared

To be positively prepared, a plan must be based on a strategy which as a minimum seeks to meet strategic level needs and be consistent with achieving sustainable development.

The fundamental point therefore is that strategic needs, such as for housing, must be met. Where a plan does not demonstrate that assessed needs will be met it will not be sound and will not achieve the aim of ensuring sustainable development.

The Council's proposed housing supply and distribution of development raises significant concerns in this respect; with the Council seeking to deliver a level of development below its needs as calculated by the standard methodology and placing a significant and unjustified reliance on the delivery of windfall development when instead certainty should be provided through the allocation of smaller and medium sites which confirm how and where the needs of the District will be met.

The Council should be seeking to allocate additional sites in order to make up for the shortfall in delivery identified and should, in accordance with the direction of the NPPF seek to allocate at least 10% of its supply on smaller and medium sites in order to ensure delivery in the initial years of the plan period. The Council has proposed a small sites policy which it considers can deliver such development however it would be more appropriate, particularly in Green Belt locations, for the Council to seek to formally allocate these sites to provide certainty for all parties.

The plan is not as a result positively prepared at this time and is in need of review and amendment prior to its submission for examination.

Justified

To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

It is essential to understand that housing delivery is best achieved through development at a range of scales; small, medium and large strategic scale. Placing reliance on only large strategic sites which are likely to have infrastructure requirements or other barriers to their delivery giving rise to significant delays in meeting objectively assessed needs for housing, is likely to guarantee that the needs in the earlier years of a plan period will not be appropriately met. Some development will inevitably come forwards through the vehicle of windfall, however the Council has made what it considers to be an

appropriate allowance for windfall in its housing trajectory and is still deficient on its housing numbers.

Whilst Paragraph 72 of the NPPF 2018 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages or towns, Paragraph 68 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. The new NPPF advocates Councils allocating at least 10% of their housing requirement on smaller sites of no larger than 1ha.

Clearly the Council has the opportunity here to allocate some sites capable of delivering less development which would still be of a significant scale having regard for the Council's housing supply. Leaving significant numbers of housing to speculative windfall provision is not reasonable or justified and does not represent good plan making.

Effective

For a plan to be effective it must be deliverable over the plan period, with appropriate consideration having been given to joint working and the duty to co-operate.

Whilst the plan has given consideration to the duty to co-operate with neighbouring authorities and this has been found not to be an option. It is not considered, for the reasons above that the local plan is effective in its current form. There are significant questions over the Council's housing trajectory in respect of the ability for the amount of development which is required to be delivered at the right time in the plan period, it is anticipated that the Council's strategic allocations will come forwards later than has been projected and will not deliver the quantum of development in the timescales which have been indicated. The Council has also provided insufficient justification for its approach to windfall development which will not ensure that the housing needs of the District are appropriately met.

It is not in this regard considered that the plan meets the tests of effectiveness in its current format, it is in need of alteration.

Consistent with National Policy

To be consistent in this respect the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

There are several overarching conflicts with the policies of the Local Plan Pre-submission Draft, as proposed, and the direction of National Policy.

The Council has not had appropriate regard for the NPPF in determining its approach to affordable housing which is not in any manner justified, it has also not had appropriate regard for the Framework in respect of its approach to securing developer contributions.

To meet the tests of soundness these policies will need to be significantly reworked.

Legal Compliance of the Plan – Sustainability Appraisal (SA)

The Council has provided the necessary evidence by way of a Sustainability Appraisal, with reference to a supporting documents library, to demonstrate that the legal requirements as set out within the Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment) Regulations (2004) have been met in preparing its Local Plan.

The fact that the Council may have undertaken the necessary assessment to demonstrate legal compliance with the SEA Regulations does not however in turn indicate that the plan strategy itself is sound. On the contrary however, failing to meet the necessary tests of legal compliance are sufficient to render a plan not sound and incapable of adoption.

The Council has sought to demonstrate that its proposed strategy is capable of meeting the tests of the SEA Regulations; however, this does not demonstrate this is the only or most appropriate strategy. In undertaking the Sustainability Appraisal (SA) the Council has had regard for opportunities for improvements to economic, social and environmental conditions as it is required to do, however it has not been conclusively demonstrated that these represent the most appropriate option. In this regard therefore whilst the legal tests of the SEA Regulations have been met this does not mean that the strategy is sound.

As discussed, it is not considered that the approach taken by the Council to the delivery of housing within the District results in the achievement of sustainable development at this time as it does not meet District's assessed housing needs in full and opportunities to spur delivery in the earlier years of the plan period instead of providing a shortfall have not been explored where reliance on windfall development could be reduced and more certainty provided.

Conclusion

Whilst there is no objection to the overarching strategy of the Purbeck Local Plan Pre-Submission Draft, there are clear and substantial failings which need to be addressed in respect of elements of the housing delivery strategy and also the wording and approach of specific policies in order to render the plan sound and capable of submission for examination.

Individual representations have been made on behalf of each of the parties whom we represent; having regard for their specific sites.

We have detailed on what grounds we object to the soundness of the plan and its compliance with the duty to co-operate. We have raised no objection in respect of the legal compliance of the plan; this itself is directly and intrinsically linked to its soundness, however we have raised issues in other regards which themselves are sufficient to render the plan unsound.

We ask that the individual representations made are considered by the Council and provided to the Inspector and that we have the opportunity to speak at the hearing sessions in respect of the matters raised.

For the purposes of clarity, we ask to be able to speak in respect of the policies of the Chapter 4 - Housing, as identified within this representation, at the Examination in Public of the Local Plan; should the EiP Inspector call hearing sessions in respect of these points.

Should the Council have any queries in relation to any of our Clients' land, please do not hesitate to contact us directly.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

Direct email:

Website:


www.kenparkeplanning.com

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP730
Response Date	03/12/18 15:49
Consultation Point	Policy 11: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (1)
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 6 - infrastructure

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (1)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP731
Response Date	03/12/18 15:49
Consultation Point	Policy I2: Improving accessibility and transport (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (1)
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 6 - infrastructure

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here.

Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (1)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Adam Bennett (1191052)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Adam Bennett - 1191052)
Comment ID	PLPP423
Response Date	03/12/18 15:50
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (2)
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Whole Local Plan soundness

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement

If you have any supporting documents please upload them here.

Purbeck Local Plan Pre-Submission Consultation Response - Ken Parke Planning Consultants.pdf (2)

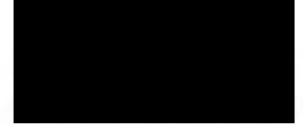
(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement



The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

3rd December 2018

Our ref: AB/4916

Dear Sir

Re: Purbeck Local Plan Review – Pre-Submission Draft Consultation – Ken Parke Planning Consultants

The following letter has been prepared in response to the Council's current consultation in respect of the Purbeck Local Plan Pre-Submission Draft which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery and management of development across Purbeck District from 2018-2034.

The following paragraphs respond to the Purbeck Local Plan Pre-Submission Draft strategy and make comment on the strategic allocations. Having regard for the fundamental determination to be made through the examination of the Local Plan, we also comment on the degree to which the plan which has been prepared is sound; in accordance with Paragraph 35 of the NPPF.

Housing – Chapter 4

Since the Council commenced with the preparation of the new Purbeck Local Plan, the Government has brought in to force the NPPF 2018. The revised NPPF now forms the overarching national policy framework, alongside Planning Practice Guidance (PPG). The Local Plan must be broadly in accordance with the direction of the NPPF in order to be found sound and capable of adoption. With the coming in to force of the NPPF the standard methodology for the calculation of housing needs now applies to all strategic plan making processes where Councils project that their plan will be submitted

for examination post January 2019. Plans submitted before this date will still be able to make use of the most up-to-date Strategic Housing Market Assessment (SHMA) data, in recognition of the fact that they have been in the midst of preparation and to avoid abortive work. Where Councils however propose to submit their plans post January 2019, any calculation of housing need should be based upon the standard methodology.

The Council has confirmed that it intends to formally submit its plan for examination between February and March 2019. Housing delivery within the plan period should thus be based on the standard methodology and any previous SHMA is of no relevance.

Housing Requirements – Policy H1

With reference to Chapter 4 of the Pre-Submission Document; Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take in to consideration the need for affordable housing.

This does not follow the direction of National Planning Policy which indicates that the standard methodology should form the basis for determination of housing need. Paragraph 002 of the Planning Practice Guidance (PPG) relating to 'Housing Needs' confirms that authorities are expected to follow the standard method in assessing local housing need. Paragraph 003 of the PPG confirms however that if Councils consider that circumstances warrant an alternative approach then they can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and any other method should only be used in exceptional circumstances.

It appears that the Council has sought to incorporate the standard methodology in to its SHMA 2018 updated in calculating its housing need, however this has based on a starting year of 2017 – as was the case at the time the Government released draft projections with the announcement of the standard methodology back in 2017 – as opposed to using the correct base year of 2018; being the current year and beginning of the Local Plan period. Planning Practice Guidance (PPG) states at Paragraph 004 of the 'Housing Need' section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Standard Methodology

Section 5 of the NPPF provides the Government's approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of **185 dwelling per annum**. This is the overarching capped figure for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,

- The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for 180 dwellings per annum and not the 168 dwellings per annum it is currently planning for. The result is a shortfall of **192 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

Housing Delivery – Policies H2, H8

Policy H2 provides the Council's delivery strategy for the 2,688 homes which are being planned for. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA 2018 and **1,225 dwellings** when compared with the actual needs for the District as calculated by the standard methodology.

The Council has made an allowance for, including the 100 windfall at Wareham, 1,033 dwellings to be delivered through a small sites policy and general windfall within existing settlements.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocation additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty for housing the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

The Council should seek to review and amend the Pre-Submission Draft Plan prior to its submission for examination.

Housing Trajectory

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly undersupply at the back end of the plan period. The precise delivery figures proposed are not clear however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded.

Housing Mix – Policy H9

The Council's housing mix policy is seeking to deliver mixed and balanced communities and provide the type and format off homes which it is suggested are required in accordance with its recent SHMA documents.

The Council as a result propose, at Policy H9 to place an obligation on all developments which deliver 20 or more homes to deliver; from the market housing provision:

- 5% as self-build plots; and,
- 10% as single storey homes.

This requirement places a significant and unreasonable expectation on all developers where sites would deliver this quantum of development without any regard for the site-specific circumstances, what is appropriate to local character and constraints and scheme viability. The Council state that if applications do not comply with this it will be necessary to demonstrate exceptional circumstances by way of a viability assessment confirming why this is the case; having regard for the viability evidence which has informed the Local Plan.

The Council has sought to justify this on the basis of the findings of the SHMA 2018. The SHMA demonstrated that there is a clear need for a mix of 2, 3 and 4 bedroom homes to meet market housing needs; being weighted more heavily towards three bedroom properties. In comparison for affordable units the mix also comprises some 1 bedroom homes and is weighted heavier towards two bedroom properties with a need for a much lesser number of 4 bedroom homes.

The Council also note from the SHMA evidence that there is a greater number, on average, of older residents within the Eastern Dorset Market Area; 27% when compared with the national average of 21%. Purbeck itself has closer to 30% of residents in the over 65 category. The Council as a result recognise a need for more housing for older persons.

Whilst there is clearly a need for more housing for older people it is not appropriate to mandate that single storey properties be provided on all sites of greater than 20 homes to deliver this aim; this has no regard for the location of the development in particular which is pertinent to whether this will (1) be attractive to this sector of the market and (2) whether it is the most appropriate location for such development having regard for the regular needs of this element of the population. Older persons housing should be directed more towards the principal settlements where there is close access to services and facilities, in particular shops, doctors, pharmacies and other day to day facilities which this section of the population rely more heavily on.

Whilst it is the case that specialist accommodation, delivered by the experienced market leaders in this sector, provides for a large element of the needs for this demographic of the population, it is recognised that more traditional housing in a non-communal environment also has its place in the

market. It is the case however that it should be developed intentionally as part of specific schemes rather than as an afterthought because it is mandated as part of applications by an overly restrictive housing mix policy.

The desire to provide housing for the older generation and lifetime homes is laudable, however there is a significant need for market housing for the wider populace, focussing on two, three and four bedroom homes, and a need to make efficient use of the land which stands to a degree opposite this. Many sites will clearly not be suitable for the delivery of single storey units, because they would be out of character or simply because that is not what would make best use of the site. The implications of single storey homes often being they require a considerably greater footprint compared to two storey dwellings and do not make best and most appropriate use of the land available.

To mandate the provision of self-build plots on schemes of this size where effectively, for a 20 units scheme, the Council would be seeking 1 self-build plot, is completely unworkable. Developers will not be willing to deliver this, and this would lead to piecemeal development within such sites at the risk of comprehensiveness. The provision of single self-build plots on sites which have otherwise been carefully considered to take account of their specific constraints and ensure appropriate amenity for neighbouring uses and proposed residents is not good planning. Effectively these plots would be constrained to a pre-determined outcome in any event and at which point is it simply the case that providing such plots would materially impact upon viability for the developer and deliver no real benefit to the person seeking to buy the self-build plot when what they can construct will not be materially different to what would have been built on the site in any event. It simply does not make any sense.

There is a place for self-build housing and it is on sites where the intention is to deliver solely this format of development; in the form of a site where landscaping and access are managed, and a design code is put in place for the development as a whole which provides a degree of flexibility but also a defined set of constraints. This represents positive and proactive planning. Singular or groups of two or three self-build plots will not provide positive planning outcomes.

It is not considered appropriate for the Council to seek to impose an overly restrictive housing mix policy which mandates certain formats of accommodation. The Council can appropriately suggest where the need for housing lies within the District, but to obligate this does not have represent good planning or the need to consider individual sites based on their own opportunities and constraints. Developers are instead likely to look to deliver 19 units on sites to avoid all of these constraints which defeats precisely the purpose of this policy. If the Council wants to seek the delivery of this format of development, it should direct this solely to its site allocations where greater

control can be had over the outcomes and meaningful numbers of these dwellings can be delivered.

The Council should strongly consider rewording this policy to place the obligation solely on allocated sites or remove this all together.

Building Regulations – Policy H10

Further to the Council's housing mix policy, it is also seeking to direct that Applicants on all sites which comprise major development, as defined by the Framework, provide at least 10% of new homes to meet the optional requirement of the Building Regulations in respect of accessibility – Category M4(2).

The Council expects this to be delivered on all sites unless site specific considerations mean this cannot be provided and in this case the Council expects a viability appraisal to be submitted to justify why the development cannot deliver this.

There are other significant considerations beyond viability which would indicate that this requirement cannot be applied; for example, flood risk and the desire to make development surface or fluvial flood resilient. The Council has had no regard for this in the construction of this policy and no stipulation is provided to remove the requirement in such circumstances.

In the case of an exceptional weather event even those areas which are not subject to any defined surface water or fluvial flood risk may be subject of an element of water ingress due to site specific circumstances such as ground levels. There are clear times when the provision of level access thresholds would not be acceptable, not because of the expense of constructing the buildings, but because it is not in the best interests of future residents and places the developer at additional risk and liability. This is something which should be determined by the Applicant, having regard for site specific circumstances and not something mandated by Local Policy.

With this provided as an option within the building regulations where developers are providing a format of accommodation where this would be desirable or beneficial it is completely superfluous to deal with this at the planning application stage and will only seek to constrain development which is completely acceptable in all respects.

Affordable Housing – Policy H11

The recently adopted National Planning Policy Framework (NPPF) imposes a new threshold for affordable housing. As the most up to date planning policy this supersedes the Ministerial Statement from 2014 which brought in to place

a 10-unit threshold with a gross floorspace limitation. The new threshold is based upon the statutory definition of Major Development; being proposals for 10 or more units or a site area of greater than 0.5ha.

The NPPF makes clear at Paragraph 63 that no affordable housing contributions should thus be required for residential developments that are not major developments; unless in designated rural areas where the LPA has adopted a lower threshold where contributions cannot be sought from developments of 5 units or fewer.

Policy H11 seeks to impose a 2 units threshold on sites where development which is not major is proposed. This is completely contrary to the NPPF and in no manner meets the tests of soundness in being consistent with National Policy.

There is absolutely no justification for this approach in any manner. The policy should be substantially reworded in this respect.

The Council is capable of adopting the lower threshold for affordable housing in designated rural areas where it will be capable of seeking contributions on sites of 6 or more units or where the site is over 0.5ha in area; as a result. The suggestion of a lower threshold however is completely unreasonable and unjustified.

Second Homes - Policy H14

The Council is seeking to follow the direction of Local Authorities such as Cornwall Council which have adopted a policy restricting the provision of second homes. The practicality however of implementing such a policy is however questionable.

The Council, through Policy H14, is seeking to impose planning conditions which will restrict the occupation of properties to only a person's sole or main residence in respect of applications for:

- The erection of new residential properties in the AONB;
- Change of use of existing buildings to residential;
- Replacement homes; and,
- The policy also applies on small sites in accordance with Policy H* and on rural exception sites.

The policy will result in some significantly odd outcomes, for example, where an existing property is occupied as a second home by the owner, they are unable to replace that building with a new dwellinghouse if they will continue to

occupy it. In gaining planning permission it would have a restriction placed upon it which would prevent them from being able to live in it.

In planning terms, they would be replacing one home, which they live in as a second home, with another which they would continue to occupy as a second home; with no material change in the use in any manner and where there would be no change in the availability of local housing stock at all. This makes absolutely no sense in planning terms at all and would not pass the test of reasonableness or necessity.

The purpose of the policy in effect is to ensure that new housing delivered is provided to meet local needs and persons from outside of the area are not buying up the housing stock which does not reduce overall needs and will potentially make affordability worse. The way to tackle this matter is not however through the imposition of an unreasonable and unenforceable condition, but rather to build more housing. The Council would be better served seeking to deliver additional housing development to take account of any issue in respect of second homes to ensure sufficient stock to meet the needs of local persons.

It is unclear why there needs to be a restriction in respect of rural exception sites as the criteria for the acceptability of such development is that there is an established local need which would be met. Persons will not be on the housing register if they already have a home which they would also retain; they may move to a new home which better addresses their needs criteria in terms of property size, or location, but they will then give up their other property. It is unclear why the policy includes this stipulation as a result; this makes little sense.

Chapter 6 – Infrastructure – Policy I1

Policy I1 of the Pre-submission Plan provides the Council's suggested approach to developer contributions.

The approach advocated appears highly irregular and confused with the Council seeking to on the one hand collect CIL contributions, but at the same time to seek contributions towards:

- Local transport;
- Health;
- Open space;
- Extension of GP facilities; and,

- Education.

By way of specific contribution to be secured by way of s106 agreement.

It is recognised that, in accordance with Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, the Council may seek site specific contributions in respect of development where it is necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind to the development. Such contributions should however be seeking to collect additional s106 contributions for matters which are included directly within CIL in respect of pooled infrastructure such as GP surgeries, education contributions, open space contributions and highways improvements which are not directly related to the site.

The Council appear to be seeking to 'double-dip' on contributions for these elements which is completely unjustified.

The policy should be reworded to state that site specific contributions may be sought where they meet the relevant tests of Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, however in all other circumstances will be secured by CIL. There is simply no justification for any other approach if the Council intends to continue to gather CIL.

Overall Soundness of the Local Plan Approach

Determining the soundness of a Local Development Plan is one of the principal roles for the examining Inspector at an EiP. 'Soundness' as a concept is defined within the NPPF by a series of tests, if these tests are met then the plan will be capable of being found sound; dependant on whether it meets the other tests of legal compliance and compliance with other relevant requirements such as the duty to co-operate, both of these aspects however fall within the realms of consideration of whether a plan is sound.

Paragraph 35 of the NPPF 2018 sets out the approach to the examination of Local Plans and whether they meet the legal and procedural requirements as enshrined within the legislation. The tests of soundness are clear, namely that a plan must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with National Policy.

Positively Prepared

To be positively prepared, a plan must be based on a strategy which as a minimum seeks to meet strategic level needs and be consistent with achieving sustainable development.

The fundamental point therefore is that strategic needs, such as for housing, must be met. Where a plan does not demonstrate that assessed needs will be met it will not be sound and will not achieve the aim of ensuring sustainable development.

The Council's proposed housing supply and distribution of development raises significant concerns in this respect; with the Council seeking to deliver a level of development below its needs as calculated by the standard methodology and placing a significant and unjustified reliance on the delivery of windfall development when instead certainty should be provided through the allocation of smaller and medium sites which confirm how and where the needs of the District will be met.

The Council should be seeking to allocate additional sites in order to make up for the shortfall in delivery identified and should, in accordance with the direction of the NPPF seek to allocate at least 10% of its supply on smaller and medium sites in order to ensure delivery in the initial years of the plan period. The Council has proposed a small sites policy which it considers can deliver such development however it would be more appropriate, particularly in Green Belt locations, for the Council to seek to formally allocate these sites to provide certainty for all parties.

The plan is not as a result positively prepared at this time and is in need of review and amendment prior to its submission for examination.

Justified

To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

It is essential to understand that housing delivery is best achieved through development at a range of scales; small, medium and large strategic scale. Placing reliance on only large strategic sites which are likely to have infrastructure requirements or other barriers to their delivery giving rise to significant delays in meeting objectively assessed needs for housing, is likely to guarantee that the needs in the earlier years of a plan period will not be appropriately met. Some development will inevitably come forwards through the vehicle of windfall, however the Council has made what it considers to be an

appropriate allowance for windfall in its housing trajectory and is still deficient on its housing numbers.

Whilst Paragraph 72 of the NPPF 2018 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages or towns, Paragraph 68 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. The new NPPF advocates Councils allocating at least 10% of their housing requirement on smaller sites of no larger than 1ha.

Clearly the Council has the opportunity here to allocate some sites capable of delivering less development which would still be of a significant scale having regard for the Council's housing supply. Leaving significant numbers of housing to speculative windfall provision is not reasonable or justified and does not represent good plan making.

Effective

For a plan to be effective it must be deliverable over the plan period, with appropriate consideration having been given to joint working and the duty to co-operate.

Whilst the plan has given consideration to the duty to co-operate with neighbouring authorities and this has been found not to be an option. It is not considered, for the reasons above that the local plan is effective in its current form. There are significant questions over the Council's housing trajectory in respect of the ability for the amount of development which is required to be delivered at the right time in the plan period, it is anticipated that the Council's strategic allocations will come forwards later than has been projected and will not deliver the quantum of development in the timescales which have been indicated. The Council has also provided insufficient justification for its approach to windfall development which will not ensure that the housing needs of the District are appropriately met.

It is not in this regard considered that the plan meets the tests of effectiveness in its current format, it is in need of alteration.

Consistent with National Policy

To be consistent in this respect the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

There are several overarching conflicts with the policies of the Local Plan Pre-submission Draft, as proposed, and the direction of National Policy.

The Council has not had appropriate regard for the NPPF in determining its approach to affordable housing which is not in any manner justified, it has also not had appropriate regard for the Framework in respect of its approach to securing developer contributions.

To meet the tests of soundness these policies will need to be significantly reworked.

Legal Compliance of the Plan – Sustainability Appraisal (SA)

The Council has provided the necessary evidence by way of a Sustainability Appraisal, with reference to a supporting documents library, to demonstrate that the legal requirements as set out within the Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment) Regulations (2004) have been met in preparing its Local Plan.

The fact that the Council may have undertaken the necessary assessment to demonstrate legal compliance with the SEA Regulations does not however in turn indicate that the plan strategy itself is sound. On the contrary however, failing to meet the necessary tests of legal compliance are sufficient to render a plan not sound and incapable of adoption.

The Council has sought to demonstrate that its proposed strategy is capable of meeting the tests of the SEA Regulations; however, this does not demonstrate this is the only or most appropriate strategy. In undertaking the Sustainability Appraisal (SA) the Council has had regard for opportunities for improvements to economic, social and environmental conditions as it is required to do, however it has not been conclusively demonstrated that these represent the most appropriate option. In this regard therefore whilst the legal tests of the SEA Regulations have been met this does not mean that the strategy is sound.

As discussed, it is not considered that the approach taken by the Council to the delivery of housing within the District results in the achievement of sustainable development at this time as it does not meet District's assessed housing needs in full and opportunities to spur delivery in the earlier years of the plan period instead of providing a shortfall have not been explored where reliance on windfall development could be reduced and more certainty provided.

Conclusion

Whilst there is no objection to the overarching strategy of the Purbeck Local Plan Pre-Submission Draft, there are clear and substantial failings which need to be addressed in respect of elements of the housing delivery strategy and also the wording and approach of specific policies in order to render the plan sound and capable of submission for examination.

Individual representations have been made on behalf of each of the parties whom we represent; having regard for their specific sites.

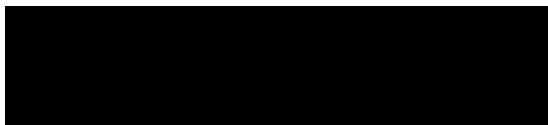
We have detailed on what grounds we object to the soundness of the plan and its compliance with the duty to co-operate. We have raised no objection in respect of the legal compliance of the plan; this itself is directly and intrinsically linked to its soundness, however we have raised issues in other regards which themselves are sufficient to render the plan unsound.

We ask that the individual representations made are considered by the Council and provided to the Inspector and that we have the opportunity to speak at the hearing sessions in respect of the matters raised.

For the purposes of clarity, we ask to be able to speak in respect of the policies of the Chapter 4 - Housing, as identified within this representation, at the Examination in Public of the Local Plan; should the EiP Inspector call hearing sessions in respect of these points.

Should the Council have any queries in relation to any of our Clients' land, please do not hesitate to contact us directly.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

Direct email:



Website:

www.kenparkeplanning.com

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP432
Response Date	03/12/18 16:22
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response - Mr LLOYD - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

3rd December 2018

Our ref: AB/3742

Dear Sir

**Re: Purbeck Local Plan Review – Pre-Submission Draft Consultation –
Land at Maple Lodge, Warmwell Road, Moreton**

The following letter has been prepared in response to the Council's current consultation in respect of the Purbeck Local Plan Pre-Submission Draft which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery and management of development across Purbeck District from 2018-2034.

This letter seeks in the main to promote 'Land at Maple Lodge, Warmwell Road' (SHLAA Ref. 6/11/1337)– 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

The site adjoins the Council's proposed strategic allocation at Moreton Quarry and can reasonably be brought in to the overall area of the allocation; providing a further point of access and opportunity for development or should be brought forwards alongside it.

The following paragraphs respond to the Purbeck Local Plan Pre-Submission Draft strategy and make comment on the strategic allocations, providing justification for why our Client's site should be allocated for housing development.

Having regard for the fundamental determination to be made through the examination of the Local Plan, we also comment on the degree to which the

plan which has been prepared is sound; in accordance with Paragraph 35 of the NPPF.

Housing Needs – Chapter 4

Since the Council commenced with the preparation of the new Purbeck Local Plan, the Government has brought in to force the NPPF 2018. The revised NPPF now forms the overarching national policy framework, alongside Planning Practice Guidance (PPG). The Local Plan must be broadly in accordance with the direction of the NPPF in order to be found sound and capable of adoption. With the coming in to force of the NPPF the standard methodology for the calculation of housing needs now applies to all strategic plan making processes where Councils project that their plan will be submitted for examination post January 2019. Plans submitted before this date will still be able to make use of the most up-to-date Strategic Housing Market Assessment (SHMA) data, in recognition of the fact that they have been in the midst of preparation and to avoid abortive work. Where Councils however propose to submit their plans post January 2019, any calculation of housing need should be based upon the standard methodology.

The Council has confirmed that it intends to formally submit its plan for examination between February and March 2019. Housing delivery within the plan period should thus be based on the standard methodology and any previous SHMA is of no relevance.

Housing Requirements – Policy H1

With reference to Chapter 4 of the Pre-Submission Document; Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take in to consideration the need for affordable housing.

This does not follow the direction of National Planning Policy which indicates that the standard methodology should form the basis for determination of housing need. Paragraph 002 of the Planning Practice Guidance (PPG) relating to 'Housing Needs' confirms that authorities are expected to follow the standard method in assessing local housing need. Paragraph 003 of the PPG confirms however that if Councils consider that circumstances warrant an alternative approach then they can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and any other method should only be used in exceptional circumstances.

It appears that the Council has sought to incorporate the standard methodology in to its SHMA 2018 updated in calculating its housing need, however this has based on a starting year of 2017 – as was the case at the time the Government released draft projections with the announcement of the standard methodology back in 2017 – as opposed to using the correct base year of 2018; being the current year and beginning of the Local Plan period. Planning Practice Guidance (PPG) states at Paragraph 004 of the ‘Housing Need’ section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Standard Methodology

Section 5 of the NPPF provides the Government’s approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of **185 dwellings per annum**. This is the overarching capped figure for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,
 - The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for 180 dwellings per annum and not the 168 dwellings per annum it is currently planning for. The result is a shortfall of **192 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

Housing Delivery – Policies H2, H8

Policy H2 provides the Council's delivery strategy for the 2,688 homes which are being planned for. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA

2018 and **1,225 dwellings** when compared with the actually needs for the District as calculated by the standard methodology.

The Council has made an allowance for, including the 100 windfall at Wareham, 1,033 dwellings to be delivered through a small sites policy and general windfall within existing settlements.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of

housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocation additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty for housing the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

The Council should seek to review and amend the Pre-submission Draft Plan prior to its submission for examination.

Housing Trajectory

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly undersupply at the back end of the plan period. The precise delivery figures proposed are not clear however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across

the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded.

Policy H4 – Moreton Station/Redbridge Pit

Having regard for the allocation at Moreton/Redbridge Pit, it is clear that mineral extraction on that site and the subsequent remediation, will not complete until the start of 2023.

There can be no homes delivered on that allocation therefore until that time. It is also the case that the SANG for the development will need to be in place in advance of the delivery of the homes so that the impacts of the development are mitigated, which will further delay the delivery of this site.

Where opportunities exist to bring forwards some development here in advance of this date, whether through facilitating or other works, these should be explored. The land promoted by our Client immediately adjoins the allocation and is available and can be delivered in the early years of the plan period; not being subject of the current works or remediation stipulations relating to the mineral extraction. There is an opportunity here for this land to form part of the wider development, whether built out for housing or utilised as an appropriate location for access or other early stage development which can assist in the quicker delivery of the allocation.

It would appear sensible to include all of the available land up to Warmwell Road within the allocation where landowners are willing to make this available for development in order to contribute to comprehensiveness. Details relating to this site are enclosed alongside this submission at **AB1**, having been submitted to the Council in March 2018 pursuant to the previous Local Plan consultation; 'New Homes for Purbeck'. The site is available and deliverable, and the landowner is willing to work with the neighbouring landowner in order not to prejudice comprehensiveness. There is no reason why this land should not be included within the wider allocation.

Affordable Housing – Policy H11

The recently adopted National Planning Policy Framework (NPPF) imposes a new threshold for affordable housing. As the most up to date planning policy this supersedes the Ministerial Statement from 2014 which brought in to place a 10-unit threshold with a gross floorspace limitation. The new threshold is

based upon the statutory definition of Major Development; being proposals for 10 or more units or a site area of greater than 0.5ha.

The NPPF makes clear at Paragraph 63 that no affordable housing contributions should thus be required for residential developments that are not major developments; unless in designated rural areas where the LPA has adopted a lower threshold where contributions cannot be sought from developments of 5 units or fewer.

Policy H11 seeks to impose a 2 units threshold on sites where development which is not major is proposed. This is completely contrary to the NPPF and in no manner meets the tests of soundness in being consistent with National Policy.

There is absolutely no justification for this approach in any manner. The policy should be substantially reworded in this respect.

The Council is capable of adopting the lower threshold for affordable housing in designated rural areas where it will be capable of seeking contributions on sites of 6 or more units or where the site is over 0.5ha in area; as a result. The suggestion of a lower threshold however is completely unreasonable and unjustified.

Chapter 6 – Infrastructure – Policy I1

Policy I1 of the Pre-submission Plan provides the Council's suggested approach to developer contributions.

The approach advocated appears highly irregular and confused with the Council seeking to on the one hand collect CIL contributions, but at the same time to seek contributions towards:

- Local transport;
- Health;
- Open space;
- Extension of GP facilities; and,
- Education.

By way of specific contribution to be secured by way of s106 agreement.

It is recognised that, in accordance with Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, the Council may

seek site specific contributions in respect of development where it is necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind to the development. Such contributions should however be seeking to collect additional s106 contributions for matters which are included directly within CIL in respect of pooled infrastructure such as GP surgeries, education contributions, open space contributions and highways improvements which are not directly related to the site.

The Council appear to be seeking to 'double-dip' on contributions for these elements which is completely unjustified.

The policy should be reworded to state that site specific contributions may be sought where they meet the relevant tests of Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, however in all other circumstances will be secured by CIL. There is simply no justification for any other approach if the Council intends to continue to gather CIL.

Overall Soundness of the Local Plan Approach

Determining the soundness of a Local Development Plan is one of the principal roles for the examining Inspector at an EiP. 'Soundness' as a concept is defined within the NPPF by a series of tests, if these tests are met then the plan will be capable of being found sound; dependant on whether it meets the other tests of legal compliance and compliance with other relevant requirements such as the duty to co-operate, both of these aspects however fall within the realms of consideration of whether a plan is sound.

Paragraph 35 of the NPPF 2018 sets out the approach to the examination of Local Plans and whether they meet the legal and procedural requirements as enshrined within the legislation. The tests of soundness are clear, namely that a plan must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with National Policy.

Positively Prepared

To be positively prepared, a plan must be based on a strategy which as a minimum seeks to meet strategic level needs and be consistent with achieving sustainable development.

The fundamental point therefore is that strategic needs, such as for housing, must be met. Where a plan does not demonstrate that assessed needs will be met it will not be sound and will not achieve the aim of ensuring sustainable development.

The Council's proposed housing supply and distribution of development raises significant concerns in this respect; with the Council seeking to deliver a level of development below its needs as calculated by the standard methodology and placing a significant and unjustified reliance on the delivery of windfall development when instead certainty should be provided through the allocation of smaller and medium sites which confirm how and where the needs of the District will be met.

The Council should be seeking to allocate additional sites in order to make up for the shortfall in delivery identified and should, in accordance with the direction of the NPPF seek to allocate at least 10% of its supply on smaller and medium sites in order to ensure delivery in the initial years of the plan period. The Council has proposed a small sites policy which it considers can deliver such development however it would be more appropriate, particularly in Green Belt locations, for the Council to seek to formally allocate these sites to provide certainty for all parties.

The plan is not as a result positively prepared at this time and is in need of review and amendment prior to its submission for examination.

Justified

To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

It is essential to understand that housing delivery is best achieved through development at a range of scales; small, medium and large strategic scale. Placing reliance on only large strategic sites which are likely to have infrastructure requirements or other barriers to their delivery giving rise to significant delays in meeting objectively assessed needs for housing, is likely to guarantee that the needs in the earlier years of a plan period will not be appropriately met. Some development will inevitably come forwards through the vehicle of windfall, however the Council has made what it considers to be an appropriate allowance for windfall in its housing trajectory and is still deficient on its housing numbers.

Whilst Paragraph 72 of the NPPF 2018 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to

existing villages or towns, Paragraph 68 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. The new NPPF advocates Councils allocating at least 10% of their housing requirement on smaller sites of no larger than 1ha.

Clearly the Council has the opportunity here to allocate some sites capable of delivering less development which would still be of a significant scale having regard for the Council's housing supply. Leaving significant numbers of housing to speculative windfall provision is not reasonable or justified and does not represent good plan making.

Effective

For a plan to be effective it must be deliverable over the plan period, with appropriate consideration having been given to joint working and the duty to co-operate.

Whilst the plan has given consideration to the duty to co-operate with neighbouring authorities and this has been found not to be an option. It is not considered, for the reasons above that the local plan is effective in its current form. There are significant questions over the Council's housing trajectory in respect of the ability for the amount of development which is required to be delivered at the right time in the plan period, it is anticipated that the Council's strategic allocations will come forwards later than has been projected and will not deliver the quantum of development in the timescales which have been indicated. The Council has also provided insufficient justification for its approach to windfall development which will not ensure that the housing needs of the District are appropriately met.

It is not in this regard considered that the plan meets the tests of effectiveness in its current format, it is in need of alteration.

Consistent with National Policy

To be consistent in this respect the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

There are several overarching conflicts with the policies of the Local Plan Pre-submission Draft, as proposed, and the direction of National Policy.

The Council has not had appropriate regard for the NPPF in determining its approach to affordable housing which is not in any manner justified, it has also

not had appropriate regard for the Framework in respect of its approach to securing developer contributions.

To meet the tests of soundness these policies will need to be significantly reworked.

Legal Compliance of the Plan – Sustainability Appraisal (SA)

The Council has provided the necessary evidence by way of a Sustainability Appraisal, with reference to a supporting documents library, to demonstrate that the legal requirements as set out within the Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment) Regulations (2004) have been met in preparing its Local Plan.

The fact that the Council may have undertaken the necessary assessment to demonstrate legal compliance with the SEA Regulations does not however in turn indicate that the plan strategy itself is sound. On the contrary however, failing to meet the necessary tests of legal compliance are sufficient to render a plan not sound and incapable of adoption.

The Council has sought to demonstrate that its proposed strategy is capable of meeting the tests of the SEA Regulations; however, this does not demonstrate this is the only or most appropriate strategy. In undertaking the Sustainability Appraisal (SA) the Council has had regard for opportunities for improvements to economic, social and environmental conditions as it is required to do, however it has not been conclusively demonstrated that these represent the most appropriate option. In this regard therefore whilst the legal tests of the SEA Regulations have been met this does not mean that the strategy is sound.

As discussed, it is not considered that the approach taken by the Council to the delivery of housing within the District results in the achievement of sustainable development at this time as it does not meet District's assessed housing needs in full and opportunities to spur delivery in the earlier years of the plan period instead of providing a shortfall have not been explored where reliance on windfall development could be reduced and more certainty provided.

Conclusion

Whilst there is no objection to the overarching strategy of the Purbeck Local Plan Pre-Submission Draft, there are clear and substantial failings which need to be addressed in respect of elements of the housing delivery strategy and

also the wording and approach of specific policies in order to render the plan sound and capable of submission for examination.

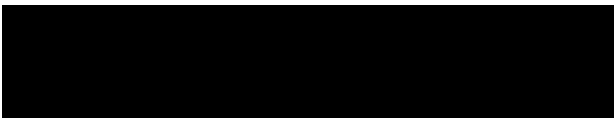
We consider that the promoted site, Land at Maple Lodge, Warmwell Road, should be brought in to and included within the proposed strategic allocation at Moreton/Warmwell Pit as an available and deliverable parcel of land which for would be best served brought forwards as part of the wider strategic allocation for the purposes of comprehensiveness.

Detailed discussion of the constraints and opportunities of the site is enclosed alongside this submission at **AB1**. This was submitted formally to the Council in March 2018 and thus the Council should have this on record in any event. The Landowner is willing to work collaboratively with the neighbouring landowner to ensure that a comprehensive scheme is delivered. There is no merit in leaving modest parcels of land omitted from the allocation, adjoining Warmwell Road, where there is an appetite to also bring these forwards for development.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and wish to take part in the Examination Hearings.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

Direct email:

Website:



www.kenparkeplanning.com

Enc.

AB1 - Letter of Representation - Land at Maple Lodge, Warmwell Road - KPPC

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

20th July 2018

Our ref: AB/3742

Dear Sir

Re: New Homes For Purbeck – Draft Purbeck Local Plan Review – Land at Maple Lodge, Warmwell Road, Moreton

The following letter has been prepared as a late response to the Council's recent 'New Homes for Purbeck' consultation document which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery of housing across Purbeck District from 2016-2033, following informal discussion with the Council's Policy Officers.

It is recognised that the Council has moved on since the consultation response provided to this document and is preparing a draft local plan based on this, we however have provided comment to this in justification of the allocation of our client's land, having regard for emerging planning policy.

This letter seeks in the main to promote 'Land at Maple Lodge, Warmwell Road' – 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

The site adjoins the Council's proposed strategic allocation at Moreton Quarry and can reasonably be brought in to the overall area of the allocation; providing a further point of access and opportunity for development or should be brought forwards alongside it.

Since the release of the Council's consultation document, the Government has released its Draft NPPF March 2018 and several other documents for consultation, including details on the Government's proposed housing needs assessment methodology. These draft documents will impact upon the delivery

of housing within Purbeck District during the plan period and have broad implications for the site selection process and for the delivery of the Local Plan review as a whole

The Draft NPPF 2018 takes a particularly robust position on the release of land within the Green Belt for housing development. Paragraph 135 of the document states that LPAs must demonstrate exceptional circumstances to justify altering Green Belt Boundaries and should ensure that the amended boundary is of a degree of permanence such that it will persist beyond the end of the plan period. The salient point here is that it is not acceptable to make repeated piecemeal changes to the Green Belt boundary and thus that sufficient land should be released at the plan review stage to meet objectively assessed housing needs in the long term.

Further detail is provided by Paragraph 136 of the Draft NPPF on how Councils must go about justifying that exceptional circumstances exist to remove land from the Green Belt. The expectation is that the LPA should have examined all other reasonable options for meeting its identified needs for development taking account of Paragraph 135 and whether the strategy:

- Makes as much use as possible of suitable brownfield sites and underutilised land;
- Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in suitably sustainable locations; and,
- Has been informed by discussions with neighbouring LPAs about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

It is further reiterated at Paragraph 138 that when defining Green Belt Boundaries, the LPA must be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

Fundamentally Councils should be allocating land outside of the Green Belt in preference to altering its defined boundaries, where land which fulfils the definition of sustainable development exists and is available and deliverable within the plan period.

Whilst it is the intention of the Council to look to submit its Local Plan Review for examination moving towards 2019, the Council must be mindful of the fact that the currently Draft NPPF 2018 is likely to be released and come in to force

in the upcoming weeks. The new NPPF will therefore have a fundamental bearing upon development throughout the remainder of the proposed plan period; 2016-2033, and the Council's future strategy for the delivery of housing will need to be developed in accordance with the new Framework and its requirements. It is important that steps are put in place at this stage to embody and react to the policy change.

The Council must expressly justify the release of land from the Green Belt at this stage in favour of the delivery of other available sites which are not located within the designation and meet the definition of sustainable development. It should be recognised that the District is highly rural in its nature with modest sized settlements and a significant dependence upon private vehicles as a result. It is not reasonable therefore to consider the need to travel alone as a determinative factor in assessing the sustainability of a site, particularly when the development would represent the best use of underutilised and previously developed land. This is reflected at Paragraph 34 of the NPPF and further within the PPG where the section on 'supporting sustainable rural communities' states that *different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas*; according with Paragraph 29 of the NPPF.

The Site

The site in question does not lie within the Green Belt and is contiguous to the proposed allocation 'Moreton Quarry' and form the interface between the proposed allocation and Warmwell Road. The site is, for planning purposes, white land, over which there are no environmental or landscape constraints.

The site is identified on the enclosed plan in red, against the wider proposed allocation of Moreton Quarry, in blue, for the purposes of clarity.

With the site not subject to any significant environmental or landscape constraints the only reason why the site cannot be delivered is that it lies outside of a defined settlement boundary. There is no reason why the Council should not seek to bring it forwards for development as part of the strategic planning process; being located outside of the settlement is not a barrier to allocation in this regard.

The existing pattern of development is comprised of a single large dwellinghouse set within a substantial plot, which does not make best and most effective use of the land. There is clearly an opportunity here for this site to be either embodied in to the wider allocation, providing opportunities for access or further development accessed from an internal estate road to the development, or for the site to be redeveloped alongside the wider allocation and infrastructure

improvements in terms of services and facilities which will be delivered as part of the development.

The surrounding pattern of development is residential in its character, local residential development is in the main of a higher suburban density. The promoted site and its neighbour are in the minority as large detached dwellings within very generous plots. The area is clearly capable of accommodating a higher density form of development in accordance with the prevailing character of the area. The other adjoining land use is that of the redundant quarry, which is being considered at this time for allocation for what will be tantamount to creation of a new settlement.

The proposed land parcel is clearly located in a suitably sustainable location where the Council considers that significant further housing growth can be supported. The redevelopment of this site alongside or as part of the allocation, for residential development should thus also be supported.

Physical and Environmental Constraints

The site is considered a strong candidate for re-development; the access from Warmwell Road is at a point where there is good visibility in both directions and the site would be readily capable of taking an upgraded junction to facilitate this.

The site measures approximately 0.9ha. the main body of the site is relatively open and free from constrains with both the eastern and western boundaries tree lined. There is also a grouping of trees at the southern end of the site. None of the trees on site are protected and a number of these are relatively poor specimens.

The topography across the site is relatively level. There are no issues of flooding or contamination on the site. The land is located within the blanket designation Flood Zone 1 and, as such, is subject to a less than 0.1% chance of flooding occurring each calendar year.

Whilst no part of the site falls within a protected designation of the Dorset Heathlands SPA the site does fall within the 5km buffer zone and thus appropriate mitigation would need to be delivered as part of any development. The indicated land lies outside of all other protected designations of National and European importance and/or buffer zones thereof.

The landowner is willing to make the site available for development now.

The New Homes for Purbeck Consultation Document

The Council has adopted the position that it needs to allocate sufficient land to deliver only 1700 additional homes within the plan period 2016-2033. This is on

the basis that it considers that it has already planned to deliver 1200 homes as part of its current strategy, which will also come forwards during the plan period; taking to total to 2900 homes; approximately 161 dwellings per annum over the plan period.

The 1200 homes which the Council suggests will come forwards as an aside to the new allocations comprises;

- 90 homes completed between April 2016 and March 2017;
- 370 homes that have planning permission but have not yet been built;
- 500 homes which could be built under current policies, including on previously developed land;
- 150 homes allocated at Swanage; and,
- 50 homes allocated at Lytchett Matravers within the adopted plan.

The Council is putting a significant reliance of the delivery of 500 homes within the plan period by way of windfall development. At the time of the examination of the 2012 Local Plan the Council did not make any allowance for windfall development in its delivery projections, however the Strategic Housing Land Availability Assessment (SHLAA) January 2018 indicates that since 2006 approximately 77% (1142 dwellings) of the District's supply has been delivered by way of windfall development. The fact that this has been the case to date however is not sufficient indicator that this will continue. The Council did not have any Local Plan in place prior to the current document; adopted in 2012. For the first 6 years of the plan period therefore there was less control on development with applications defaulting to being determined in accordance with National Planning Policy in the absence of any up to date plan. Delivery in the initial 4 years up to 2010 was significant and comprised almost wholesale windfall development whereas, thereafter, delivery fell off considerably from 2010-2015. To anticipate windfall delivery on anything like the same rate would therefore be misguided. The Council should provide appropriate justification for how the 500 homes it is suggesting can be delivered; having particular regard for the low rate of delivery in recent years, with the exception of 2015-16; when the strategic allocation west of Wareham came forwards.

There is no evidence at this time therefore to suggest that this figure is likely to be achievable.

The New Homes for Purbeck consultation document proposes three potential options for the delivery of the 1700 additional homes the Council suggests it needs to plan for across the plan period;

- Option A represents a hybrid approach of Green Belt release at Lytchett Matravers and Upton and development of less constrained land at Wool settlement, 250 homes on unidentified smaller sites across the District and a significant new community development south of Moreton; on the furthest fringe of Purbeck District. The new community proposed at Moreton will be reliant on new infrastructure provision and the services and facilities within Crossways; which sits within West Dorset District. The expectation that 250 homes will be delivered by way of a collection of smaller sites for up to 30 dwellings does not appear to have been appropriately evidenced and there is no confirmation of where these sites will be and whether they are actually available or deliverable. Given that several of the sites proposed for allocation at Wool and Lytchett Matravers would deliver less than 30 units each and are considered of sufficient scale to allocate, it is inconsistent and somewhat unreasonable for the Council to place a significant degree of uncertainty on the delivery of 250 homes – just under 10% of the indicated housing need. This does not provide an adequate degree of certainty that the Council's housing needs can be met which fails the tests of Paragraph 47 of the NPPF (2012) and thus this approach would not meet the tests of 'soundness' set out at Paragraph 182 of the NPPF in that the plan would be neither positively prepared nor effective.
- Option B seeks to direct the housing supply in the main to the settlement of Wool and the new community south of Moreton, with the remaining 250 homes to be again delivered on yet unidentified sites. Taking this approach would put significant strain on the settlement of Wool in terms of its existing infrastructure; moreover, given the number of sites and sheer amount of development it is unlikely that new homes will be delivered at a sufficient rate to meet the Council's housing needs, with developers not wishing to flood the local market and in turn harm sales prices and profitability. Again, the absence of any certainty on where the other 250 homes required will be delivered is not reasonable and will not pass the tests of soundness.
- Option C seeks to direct even more development to Wool – not less than 800 homes and 600 homes within the new community south of Moreton. Delivering the housing in this manner will further exacerbate the strain imposed on Wool and further hamper actual housing completions to the extent that the Council is unlikely to be meeting its projected housing delivery figures. It is not rational to expect that developers will seek to bring forwards several of these sites in tandem and flood the market with new homes; the reality is that only a limited number of units will be delivered per annum.

With all three options there are serious concerns over the ability for Wool settlement to (1) accommodate this level of growth given the need for significant infrastructure improvements and for the delivery of a new school, and (2) due to significant flood risk considerations; both for fluvial and surface water flows, at Wool which have not been appropriately investigated. Several of the sites are subject to high surface water flooding risk in isolation which would need to be managed. It is important however that the Council takes a holistic view to the potential for the cumulative development of all of the identified greenfield sites contiguous to the settlement to put a significant pressure upon and increase the risk of flooding across the settlement in general with a significant increase in the level of built form and hard surfacing and diminishing of the land's capacity for natural infiltration.

The Council's current approach in Options A & B of leaving 250 homes unallocated to be delivered on suitable smaller sites of up to 30 units across the District is not reasonable. The Council has already accounted within its suggested available housing supply of 1200 homes, for the delivery of 500 dwellings in accordance with the policies in the existing Local Plan. In combination with the additional 250 homes to be delivered on yet unallocated sites there is an expectation that 750 homes will be delivered via windfall development within the proposed plan period.

In reality there are not sufficient sites which sit within or on the edge of existing settlements which can be readily brought forwards for development of approximately 30 homes in accordance with suggested small sites policy. Many of the settlements within Purbeck District are constrained by either the Green Belt or protected designations of the Dorset Heathlands, or are located within the protected landscape of the AONB where exceptional circumstances would need to be demonstrated to justify the development. It is not reasonable to expect significant development to come forwards in this manner without a directed planning policy approach.

It would be far more appropriate for the Council to seek to provide more certainty for the general public, landowners, stakeholders and developers, by actually allocating sufficient sites to meet the Council's needs. If additional land comes forwards during the plan period and the Council exceeds its housing needs target, then this is not an issue. Housing need is not a maximum figure, but rather a minimum. The purpose is to ensure that the objectively assessed needs of the District are met by delivering at least the required amount of housing. The Council should not be a barrier to the development of sustainable sites.

The promoted site can reasonably be brought forwards as part of the wider allocation at Moreton and contribute towards addressing the lack of certainty in

respect of the Council's allowance for both windfall housing and additional sites on the edge of settlement for up to 30 dwellings; without these being formally allocated.

It is unrealistic to leave such a degree of uncertainty in respect of the Council's smaller sites policy which will be hampered by the environmental and landscape constraints within the District. In order to be effective, the Council should instead seek to allocate sites now and provide certainty and ensure the approach can be found sound. The recent rates of delivery within the District are indicative of the fact that the current Local Plan policies do not allow for sustainable development to come forwards in this manner, particularly on sites of up to 30 units as is suggested. There is no justification for this policy rationale.

Housing Delivery to Date

The Council has recently published what it considers to be an up to date Five Year Housing Land Supply Report; covering the period April 2017 to March 2022, but also setting out its figures for completions to date and its performance in respect of the overall housing needs for the plan period.

The report confirms the Council's position that it can demonstrate in excess of a 5-year supply of deliverable sites based on its performance to date within the plan period. Unfortunately, the forecasts set out within the document are not correct.

The Council has stuck rigidly to the belief that it needed to deliver only 120 dwellings per annum over the course of the plan period since its adoption in 2012. Unfortunately, the Council has not properly taken in to account the EiP Inspector's Report which, whilst recommending adoption of the Purbeck Local Plan 2012 at that time, made clear that the Council's housing figures were inadequate and needed to be reviewed immediately. The Inspector stated that a partial review would need to be undertaken, commencing in 2013 and to be in place by 2017, based on the Strategic Housing Market Assessment 2012 which projected a requirement for not less than 170 dwellings per annum to be delivered across the plan period.

The EiP Inspector stated clearly that the Purbeck Local Plan Part 1 (2012) was to be found sound as there was no other established policy framework in place due to failings with previous plan documents. Whilst allowing the plan to be made, the Inspector did not consider that it was sound in respect of its approach to housing. He was clear in his report that *policies regarding housing supply would be immediately out of date* and that the Council was only being allowed to proceed on the basis that it agreed to undertake an immediate review commencing in 2013 with the new plan to be adopted by 2017. Failing this its

plan would be out of date and it would not be able to rely on its out of date delivery strategy.

The EiP Inspector was very clear that this figure whilst appropriate for the short term; i.e. the first 5 years of the plan period, it was not appropriate for the medium or long terms and that the Council should instead amend its housing needs figure to 170 dwellings per annum (dpa). The EiP Inspector required specifically that the need to fundamentally review the housing position and adopt a figure of 170 dpa be written in to the Local Plan Part 1.

The Council has not reflected the fact that a more up to date assessment of its housing need was undertaken during the course of the adopted Local Plan preparation and examination and thus should have formed the starting point for its housing needs since 2012, as directed by the Inspector. The Council has not updated its housing need projections as it was required to do and, as a result, the housing requirement figure for the next 5 years is completely inaccurate.

In reality therefore, the Council has underdelivered on its housing needs to date within the current local plan period;

(1)

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 850 dwellings (170 per annum)
Total Need to Date	– 1570 dwellings

Recorded Completions 2006-2017	– 1476 dwellings
Performance Relative to Need	– <u>94 dwellings shortfall</u>

Assuming the Sedgefield method of addressing housing shortfall is employed.

5-year requirement 2017-2022	– 987 dwellings (170 per annum plus shortfall and 5% buffer)
Annual Requirement 2017-2022	- 197.4 dwellings

(2)

Even if we assume that the housing need figure should remain at 120 dwellings per annum until the 2017 deadline set by the inspector for undertaking and adoption of the Local Plan review;

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 600 dwellings (120 per annum)
Total Need to Date	– 1320 dwellings

Recorded Completions 2006-2017	– 1476 dwellings
--------------------------------	------------------

Performance Relative to Need – 156 dwellings surplus

Remaining Need to 2027 – 1622 dwellings
(170 per annum minus oversupply and adding 5%
buffer)

5-year requirement 2017-2022 – **811 dwellings**

Annual Requirement 2017-2022 - **162.2 dwellings**

Taking either projection in to account the Council cannot demonstrate a 5-year supply based on the 618 dwellings which it has projected are available and deliverable. This would amount to **3.1 years** of supply in the worst-case scenario (1) and **3.8 years** of supply in the best-case scenario (2).

The result is that the Council does not have sufficient land to meet its needs in the short terms and should be planning for additional development to ensure that its needs can be adequately met.

This absence of a deliverable 5 year housing land supply puts in jeopardy the figures set out within the New Homes for Purbeck consultation document – particularly that the Council has allowed for 500 dwellings by way of windfall provision; that would comply with current local plan policy, in addition to 250 dwellings which the Council considers a can be brought forwards within the plan period as part of a small sites policy for less than 30 dwellings. There is simply no justification for these figures and no evidence to demonstrate that this is in any manner achievable. A position which is backed up by the Council's recent competition statistics for 2016-2017 which stands at just 89 units. It is also relevant to note that this does not tally with the 90 homes stated by the New Homes for Purbeck Consultation Document.

The Council commissioned as part of its plan review, the preparation of a formal assessment of its objectively assessed needs for the period 2013-2033. The document prepared by GL Hearn states that the annualised housing need for the District during this period amounts to **173 dwellings per annum**. Updating the projections on this basis puts the Council in an equally bleak position of **3.2 years of supply** at present based on the Sedgfield method of addressing any shortfall within the next 5-year period. It is worth noting that even employing the Liverpool method would leave the Council without a deliverable 5-year supply.

Considering the above, the Council should therefore be planning for the delivery of not less than 3460 homes from 2013-2033. The Council's completion figures between 2013 and 2017 amount to 460 dwellings. The result therefore is that the Council should be planning to deliver not less than **3000 additional homes** as part of the Local Plan review.

The Proposals

There are several opportunities presented by the proposed site; whether redeveloped alongside the strategic allocation for housing, providing demonstrable value as an opportunity to provide an additional access in to the wider development site or as an additional parcel of land which could be brought in to the allocation.

In terms of its own development potential the site is of sufficient scale to provide approximately 8-10 dwellinghouses, as per the indicative layout submitted, of which a policy compliant provision could be provided as affordable housing.



The value of the land however may be much greater in contributing to the wider development opportunity in facilitating easier access along the north-western edge of the site and providing additional land for development. At present there is a projecting parcel of land which adjoins the Warmwell Road frontage, forming part of this allocation, but this is heavily timbered and itself is too narrow to provide a substantial level of development within. In combination with our client's land however, there would be a much greater extent of road frontage and in combination this projecting element to the highway provides a meaningful development opportunity which could be positively master planned as part of a wider scheme.

The landowner would be willing to engage positively with the wider landholder in order to achieve a cohesive development in this respect.

Conclusion

The New Homes for Purbeck Consultation Document seeks to allocate land for an additional 1700 homes; supplemental to 1200 which it considers can and will be delivered without any additional allocations. Even if all of the projected housing comes forwards as suggested, the Council will still be short of meeting its housing and this does not account for an appropriate buffer of sites for non-delivery.

The Council should therefore look to allocate additional unconstrained sites which can be delivered in a sustainable manner. The fact that sites lie outside of a defined settlement is not an issue at plan making stage.

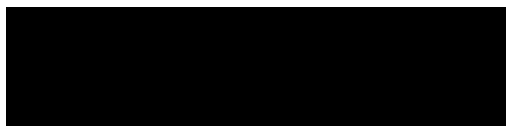
The landowner is willing to make their site available now and thus it can be delivered within the next 5 years in order to assist the Council in meeting its housing needs; whether forming part of the wider allocation or being brought forwards for housing alongside it. The Council must take a pragmatic approach to the allocation of sites to ensure that it is not left in a position without an up to date and adopted plan which will inevitably lead to planning by appeal; having parts of a wider strategic allocation that can be brought forwards in an earlier timeframe will assist this.

The Council should reasonably and justifiably consider the formal allocation of the site for housing development within the Core Strategy Review.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and notified of any further consultation periods.

Yours sincerely



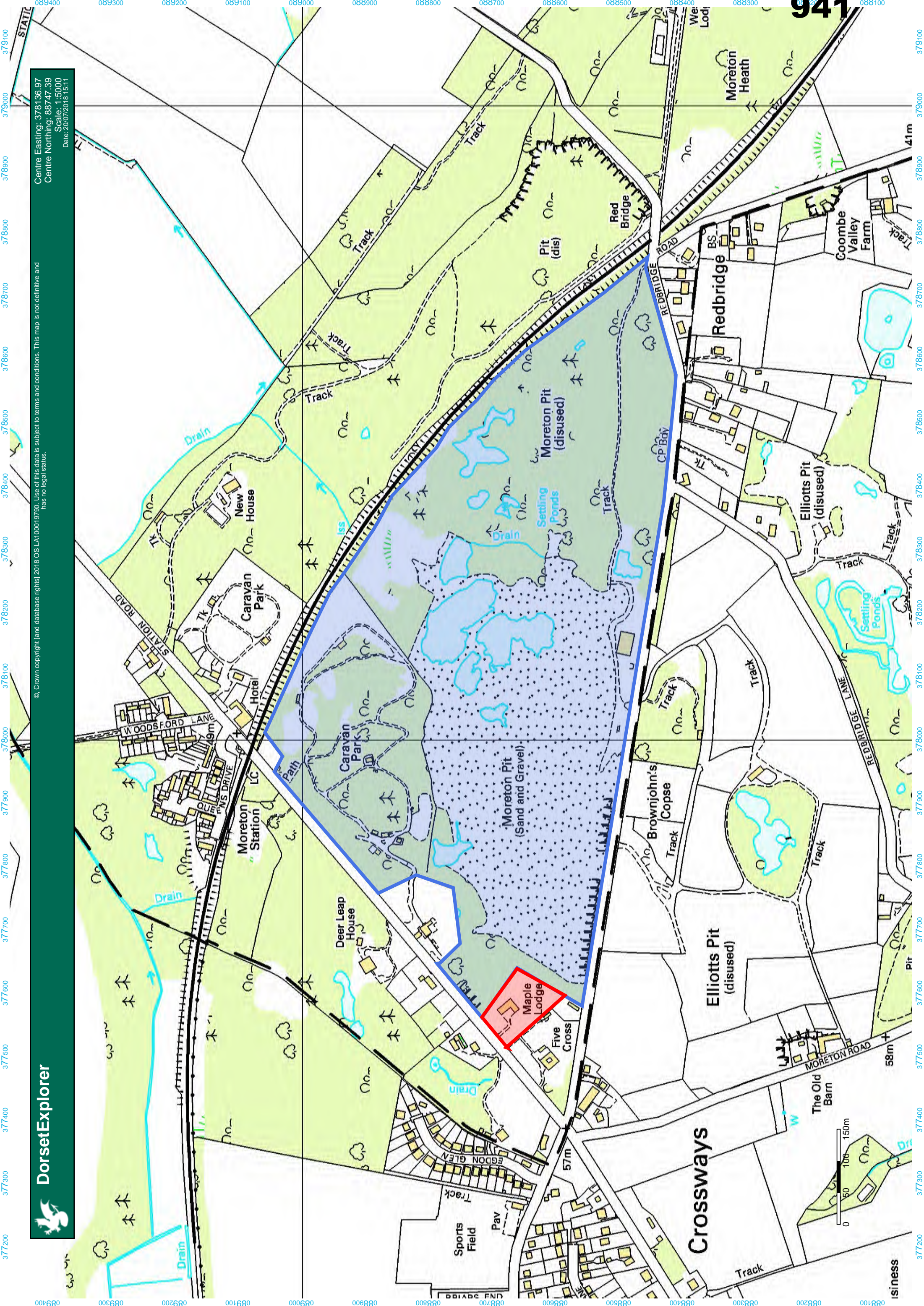
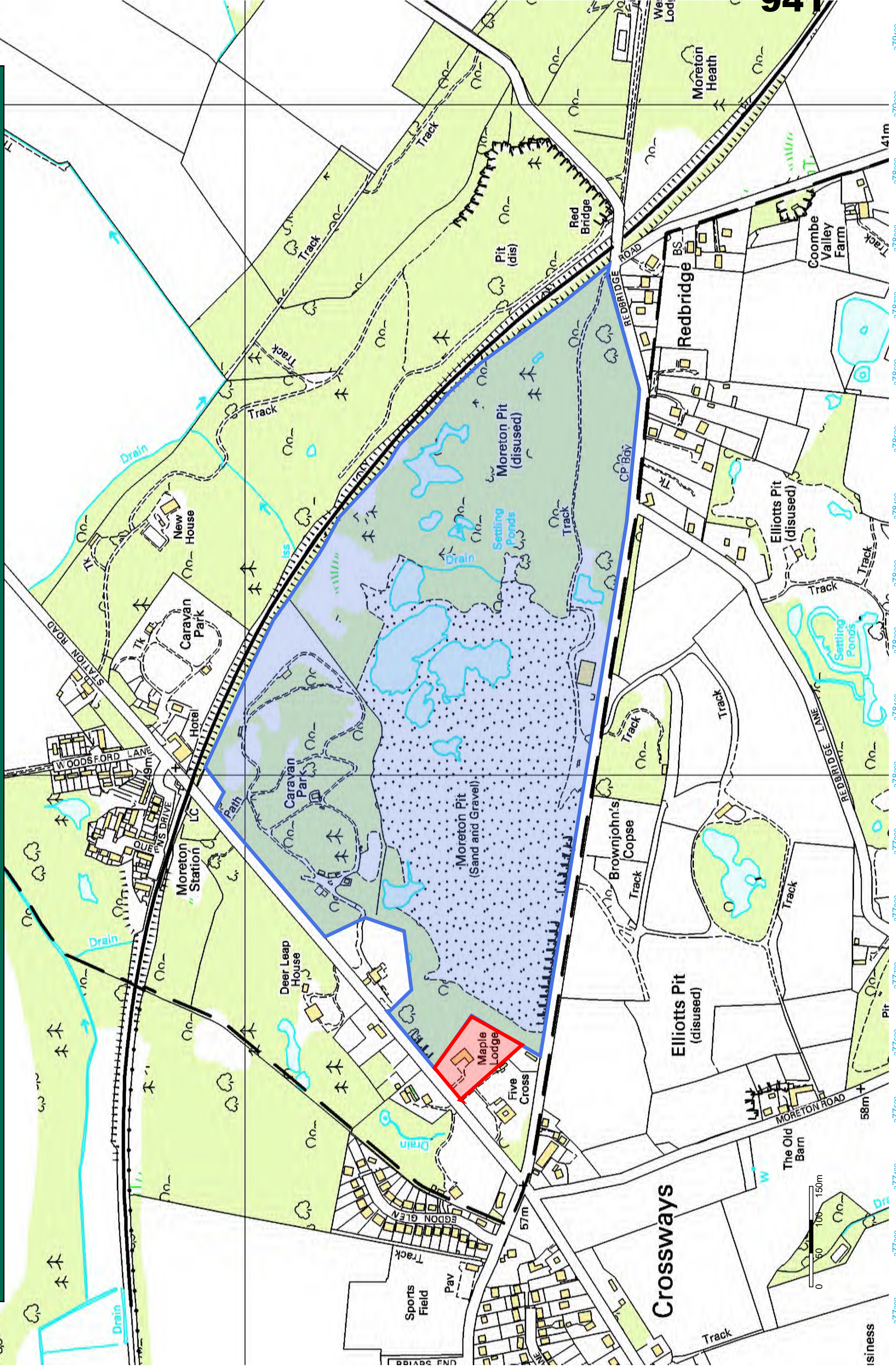
Adam Bennett BA (Hons)
Town Planning Consultant

Enc.
Site Location Plan
Indicative Layout Plan – prepared by LMA Architects.



Centre Easting: 378136.97
Centre Northing: 88747.39
Scale: 1:5000
Date: 20/07/2018 15:11

© Crown copyright [and database rights] 2018 OS LA100019700. Use of this data is subject to terms and conditions. This map is not definitive and has no legal status.





Proposed Site Plan (1:500)

Rev.	Date	Details	Drawn	Checked
Issued for:				
PRELIMINARY				
Project/Client:		Project No:		
Maple Lodge, Dorchester.		LMA.18.001		
Cicero Estates		Dwg No:		
		SK001		
Drawing:		Rev:		
Proposed Sketch Plan		Scale:		
		1:500 @A3		
Drawn By:		Date:		
*		08.02.18		
Checked By:		Date:		
*		*		

3rd Floor
70-74 Norwich Avenue West,
Bournemouth
BH2 6AW

T 01202 375818
info@lmaarchitects.co.uk
www.lmaarchitects.co.uk



Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP732
Response Date	03/12/18 16:22
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP733
Response Date	03/12/18 16:22
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP734
Response Date	03/12/18 16:22
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Mr LLOYD - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP735
Response Date	03/12/18 16:22
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Mr LLOYD - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP736
Response Date	03/12/18 16:22
Consultation Point	Policy H10: Part M of the Building Regulations (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP737
Response Date	03/12/18 16:22
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response - Mr LLOYD - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

Comment

Agent	(1191050)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Mr Lloyd (1191216)
Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Mr Lloyd - 1191216)
Comment ID	PLPP433
Response Date	03/12/18 16:24
Consultation Point	Chapter 6: Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Mr LLOYD - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 6 Infrastructure

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please see attached statement and AB1

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Mr LLoyd - KPPC.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Please see attached statement and AB1

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

3rd December 2018

Our ref: AB/3742

Dear Sir

**Re: Purbeck Local Plan Review – Pre-Submission Draft Consultation –
Land at Maple Lodge, Warmwell Road, Moreton**

The following letter has been prepared in response to the Council's current consultation in respect of the Purbeck Local Plan Pre-Submission Draft which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery and management of development across Purbeck District from 2018-2034.

This letter seeks in the main to promote 'Land at Maple Lodge, Warmwell Road' (SHLAA Ref. 6/11/1337)– 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

The site adjoins the Council's proposed strategic allocation at Moreton Quarry and can reasonably be brought in to the overall area of the allocation; providing a further point of access and opportunity for development or should be brought forwards alongside it.

The following paragraphs respond to the Purbeck Local Plan Pre-Submission Draft strategy and make comment on the strategic allocations, providing justification for why our Client's site should be allocated for housing development.

Having regard for the fundamental determination to be made through the examination of the Local Plan, we also comment on the degree to which the

plan which has been prepared is sound; in accordance with Paragraph 35 of the NPPF.

Housing Needs – Chapter 4

Since the Council commenced with the preparation of the new Purbeck Local Plan, the Government has brought in to force the NPPF 2018. The revised NPPF now forms the overarching national policy framework, alongside Planning Practice Guidance (PPG). The Local Plan must be broadly in accordance with the direction of the NPPF in order to be found sound and capable of adoption. With the coming in to force of the NPPF the standard methodology for the calculation of housing needs now applies to all strategic plan making processes where Councils project that their plan will be submitted for examination post January 2019. Plans submitted before this date will still be able to make use of the most up-to-date Strategic Housing Market Assessment (SHMA) data, in recognition of the fact that they have been in the midst of preparation and to avoid abortive work. Where Councils however propose to submit their plans post January 2019, any calculation of housing need should be based upon the standard methodology.

The Council has confirmed that it intends to formally submit its plan for examination between February and March 2019. Housing delivery within the plan period should thus be based on the standard methodology and any previous SHMA is of no relevance.

Housing Requirements – Policy H1

With reference to Chapter 4 of the Pre-Submission Document; Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take in to consideration the need for affordable housing.

This does not follow the direction of National Planning Policy which indicates that the standard methodology should form the basis for determination of housing need. Paragraph 002 of the Planning Practice Guidance (PPG) relating to 'Housing Needs' confirms that authorities are expected to follow the standard method in assessing local housing need. Paragraph 003 of the PPG confirms however that if Councils consider that circumstances warrant an alternative approach then they can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and any other method should only be used in exceptional circumstances.

It appears that the Council has sought to incorporate the standard methodology in to its SHMA 2018 updated in calculating its housing need, however this has based on a starting year of 2017 – as was the case at the time the Government released draft projections with the announcement of the standard methodology back in 2017 – as opposed to using the correct base year of 2018; being the current year and beginning of the Local Plan period. Planning Practice Guidance (PPG) states at Paragraph 004 of the ‘Housing Need’ section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Standard Methodology

Section 5 of the NPPF provides the Government’s approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of **185 dwellings per annum**. This is the overarching capped figure for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,
 - The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for 180 dwellings per annum and not the 168 dwellings per annum it is currently planning for. The result is a shortfall of **192 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

Housing Delivery – Policies H2, H8

Policy H2 provides the Council's delivery strategy for the 2,688 homes which are being planned for. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA

2018 and **1,225 dwellings** when compared with the actually needs for the District as calculated by the standard methodology.

The Council has made an allowance for, including the 100 windfall at Wareham, 1,033 dwellings to be delivered through a small sites policy and general windfall within existing settlements.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of

housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocation additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty for housing the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

The Council should seek to review and amend the Pre-submission Draft Plan prior to its submission for examination.

Housing Trajectory

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly undersupply at the back end of the plan period. The precise delivery figures proposed are not clear however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across

the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded.

Policy H4 – Moreton Station/Redbridge Pit

Having regard for the allocation at Moreton/Redbridge Pit, it is clear that mineral extraction on that site and the subsequent remediation, will not complete until the start of 2023.

There can be no homes delivered on that allocation therefore until that time. It is also the case that the SANG for the development will need to be in place in advance of the delivery of the homes so that the impacts of the development are mitigated, which will further delay the delivery of this site.

Where opportunities exist to bring forwards some development here in advance of this date, whether through facilitating or other works, these should be explored. The land promoted by our Client immediately adjoins the allocation and is available and can be delivered in the early years of the plan period; not being subject of the current works or remediation stipulations relating to the mineral extraction. There is an opportunity here for this land to form part of the wider development, whether built out for housing or utilised as an appropriate location for access or other early stage development which can assist in the quicker delivery of the allocation.

It would appear sensible to include all of the available land up to Warmwell Road within the allocation where landowners are willing to make this available for development in order to contribute to comprehensiveness. Details relating to this site are enclosed alongside this submission at **AB1**, having been submitted to the Council in March 2018 pursuant to the previous Local Plan consultation; 'New Homes for Purbeck'. The site is available and deliverable, and the landowner is willing to work with the neighbouring landowner in order not to prejudice comprehensiveness. There is no reason why this land should not be included within the wider allocation.

Affordable Housing – Policy H11

The recently adopted National Planning Policy Framework (NPPF) imposes a new threshold for affordable housing. As the most up to date planning policy this supersedes the Ministerial Statement from 2014 which brought in to place a 10-unit threshold with a gross floorspace limitation. The new threshold is

based upon the statutory definition of Major Development; being proposals for 10 or more units or a site area of greater than 0.5ha.

The NPPF makes clear at Paragraph 63 that no affordable housing contributions should thus be required for residential developments that are not major developments; unless in designated rural areas where the LPA has adopted a lower threshold where contributions cannot be sought from developments of 5 units or fewer.

Policy H11 seeks to impose a 2 units threshold on sites where development which is not major is proposed. This is completely contrary to the NPPF and in no manner meets the tests of soundness in being consistent with National Policy.

There is absolutely no justification for this approach in any manner. The policy should be substantially reworded in this respect.

The Council is capable of adopting the lower threshold for affordable housing in designated rural areas where it will be capable of seeking contributions on sites of 6 or more units or where the site is over 0.5ha in area; as a result. The suggestion of a lower threshold however is completely unreasonable and unjustified.

Chapter 6 – Infrastructure – Policy I1

Policy I1 of the Pre-submission Plan provides the Council's suggested approach to developer contributions.

The approach advocated appears highly irregular and confused with the Council seeking to on the one hand collect CIL contributions, but at the same time to seek contributions towards:

- Local transport;
- Health;
- Open space;
- Extension of GP facilities; and,
- Education.

By way of specific contribution to be secured by way of s106 agreement.

It is recognised that, in accordance with Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, the Council may

seek site specific contributions in respect of development where it is necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind to the development. Such contributions should however be seeking to collect additional s106 contributions for matters which are included directly within CIL in respect of pooled infrastructure such as GP surgeries, education contributions, open space contributions and highways improvements which are not directly related to the site.

The Council appear to be seeking to 'double-dip' on contributions for these elements which is completely unjustified.

The policy should be reworded to state that site specific contributions may be sought where they meet the relevant tests of Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, however in all other circumstances will be secured by CIL. There is simply no justification for any other approach if the Council intends to continue to gather CIL.

Overall Soundness of the Local Plan Approach

Determining the soundness of a Local Development Plan is one of the principal roles for the examining Inspector at an EiP. 'Soundness' as a concept is defined within the NPPF by a series of tests, if these tests are met then the plan will be capable of being found sound; dependant on whether it meets the other tests of legal compliance and compliance with other relevant requirements such as the duty to co-operate, both of these aspects however fall within the realms of consideration of whether a plan is sound.

Paragraph 35 of the NPPF 2018 sets out the approach to the examination of Local Plans and whether they meet the legal and procedural requirements as enshrined within the legislation. The tests of soundness are clear, namely that a plan must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with National Policy.

Positively Prepared

To be positively prepared, a plan must be based on a strategy which as a minimum seeks to meet strategic level needs and be consistent with achieving sustainable development.

The fundamental point therefore is that strategic needs, such as for housing, must be met. Where a plan does not demonstrate that assessed needs will be met it will not be sound and will not achieve the aim of ensuring sustainable development.

The Council's proposed housing supply and distribution of development raises significant concerns in this respect; with the Council seeking to deliver a level of development below its needs as calculated by the standard methodology and placing a significant and unjustified reliance on the delivery of windfall development when instead certainty should be provided through the allocation of smaller and medium sites which confirm how and where the needs of the District will be met.

The Council should be seeking to allocate additional sites in order to make up for the shortfall in delivery identified and should, in accordance with the direction of the NPPF seek to allocate at least 10% of its supply on smaller and medium sites in order to ensure delivery in the initial years of the plan period. The Council has proposed a small sites policy which it considers can deliver such development however it would be more appropriate, particularly in Green Belt locations, for the Council to seek to formally allocate these sites to provide certainty for all parties.

The plan is not as a result positively prepared at this time and is in need of review and amendment prior to its submission for examination.

Justified

To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

It is essential to understand that housing delivery is best achieved through development at a range of scales; small, medium and large strategic scale. Placing reliance on only large strategic sites which are likely to have infrastructure requirements or other barriers to their delivery giving rise to significant delays in meeting objectively assessed needs for housing, is likely to guarantee that the needs in the earlier years of a plan period will not be appropriately met. Some development will inevitably come forwards through the vehicle of windfall, however the Council has made what it considers to be an appropriate allowance for windfall in its housing trajectory and is still deficient on its housing numbers.

Whilst Paragraph 72 of the NPPF 2018 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to

existing villages or towns, Paragraph 68 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. The new NPPF advocates Councils allocating at least 10% of their housing requirement on smaller sites of no larger than 1ha.

Clearly the Council has the opportunity here to allocate some sites capable of delivering less development which would still be of a significant scale having regard for the Council's housing supply. Leaving significant numbers of housing to speculative windfall provision is not reasonable or justified and does not represent good plan making.

Effective

For a plan to be effective it must be deliverable over the plan period, with appropriate consideration having been given to joint working and the duty to co-operate.

Whilst the plan has given consideration to the duty to co-operate with neighbouring authorities and this has been found not to be an option. It is not considered, for the reasons above that the local plan is effective in its current form. There are significant questions over the Council's housing trajectory in respect of the ability for the amount of development which is required to be delivered at the right time in the plan period, it is anticipated that the Council's strategic allocations will come forwards later than has been projected and will not deliver the quantum of development in the timescales which have been indicated. The Council has also provided insufficient justification for its approach to windfall development which will not ensure that the housing needs of the District are appropriately met.

It is not in this regard considered that the plan meets the tests of effectiveness in its current format, it is in need of alteration.

Consistent with National Policy

To be consistent in this respect the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

There are several overarching conflicts with the policies of the Local Plan Pre-submission Draft, as proposed, and the direction of National Policy.

The Council has not had appropriate regard for the NPPF in determining its approach to affordable housing which is not in any manner justified, it has also

not had appropriate regard for the Framework in respect of its approach to securing developer contributions.

To meet the tests of soundness these policies will need to be significantly reworked.

Legal Compliance of the Plan – Sustainability Appraisal (SA)

The Council has provided the necessary evidence by way of a Sustainability Appraisal, with reference to a supporting documents library, to demonstrate that the legal requirements as set out within the Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment) Regulations (2004) have been met in preparing its Local Plan.

The fact that the Council may have undertaken the necessary assessment to demonstrate legal compliance with the SEA Regulations does not however in turn indicate that the plan strategy itself is sound. On the contrary however, failing to meet the necessary tests of legal compliance are sufficient to render a plan not sound and incapable of adoption.

The Council has sought to demonstrate that its proposed strategy is capable of meeting the tests of the SEA Regulations; however, this does not demonstrate this is the only or most appropriate strategy. In undertaking the Sustainability Appraisal (SA) the Council has had regard for opportunities for improvements to economic, social and environmental conditions as it is required to do, however it has not been conclusively demonstrated that these represent the most appropriate option. In this regard therefore whilst the legal tests of the SEA Regulations have been met this does not mean that the strategy is sound.

As discussed, it is not considered that the approach taken by the Council to the delivery of housing within the District results in the achievement of sustainable development at this time as it does not meet District's assessed housing needs in full and opportunities to spur delivery in the earlier years of the plan period instead of providing a shortfall have not been explored where reliance on windfall development could be reduced and more certainty provided.

Conclusion

Whilst there is no objection to the overarching strategy of the Purbeck Local Plan Pre-Submission Draft, there are clear and substantial failings which need to be addressed in respect of elements of the housing delivery strategy and

also the wording and approach of specific policies in order to render the plan sound and capable of submission for examination.

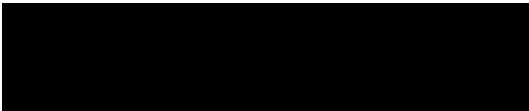
We consider that the promoted site, Land at Maple Lodge, Warmwell Road, should be brought in to and included within the proposed strategic allocation at Moreton/Warmwell Pit as an available and deliverable parcel of land which for would be best served brought forwards as part of the wider strategic allocation for the purposes of comprehensiveness.

Detailed discussion of the constraints and opportunities of the site is enclosed alongside this submission at **AB1**. This was submitted formally to the Council in March 2018 and thus the Council should have this on record in any event. The Landowner is willing to work collaboratively with the neighbouring landowner to ensure that a comprehensive scheme is delivered. There is no merit in leaving modest parcels of land omitted from the allocation, adjoining Warmwell Road, where there is an appetite to also bring these forwards for development.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and wish to take part in the Examination Hearings.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

Direct email:



Website:

www.kenparkeplanning.com

Enc.

AB1 - Letter of Representation - Land at Maple Lodge, Warmwell Road - KPPC

AB1

970


KenParke
PLANNING CONSULTANTS

Anniversary House
23 Abbott Road
Bournemouth BH9 1EU

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

20th July 2018

Our ref: AB/3742

Dear Sir

Re: New Homes For Purbeck – Draft Purbeck Local Plan Review – Land at Maple Lodge, Warmwell Road, Moreton

The following letter has been prepared as a late response to the Council's recent 'New Homes for Purbeck' consultation document which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery of housing across Purbeck District from 2016-2033, following informal discussion with the Council's Policy Officers.

It is recognised that the Council has moved on since the consultation response provided to this document and is preparing a draft local plan based on this, we however have provided comment to this in justification of the allocation of our client's land, having regard for emerging planning policy.

This letter seeks in the main to promote 'Land at Maple Lodge, Warmwell Road' – 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

The site adjoins the Council's proposed strategic allocation at Moreton Quarry and can reasonably be brought in to the overall area of the allocation; providing a further point of access and opportunity for development or should be brought forwards alongside it.

Since the release of the Council's consultation document, the Government has released its Draft NPPF March 2018 and several other documents for consultation, including details on the Government's proposed housing needs assessment methodology. These draft documents will impact upon the delivery

of housing within Purbeck District during the plan period and have broad implications for the site selection process and for the delivery of the Local Plan review as a whole

The Draft NPPF 2018 takes a particularly robust position on the release of land within the Green Belt for housing development. Paragraph 135 of the document states that LPAs must demonstrate exceptional circumstances to justify altering Green Belt Boundaries and should ensure that the amended boundary is of a degree of permanence such that it will persist beyond the end of the plan period. The salient point here is that it is not acceptable to make repeated piecemeal changes to the Green Belt boundary and thus that sufficient land should be released at the plan review stage to meet objectively assessed housing needs in the long term.

Further detail is provided by Paragraph 136 of the Draft NPPF on how Councils must go about justifying that exceptional circumstances exist to remove land from the Green Belt. The expectation is that the LPA should have examined all other reasonable options for meeting its identified needs for development taking account of Paragraph 135 and whether the strategy:

- Makes as much use as possible of suitable brownfield sites and underutilised land;
- Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in suitably sustainable locations; and,
- Has been informed by discussions with neighbouring LPAs about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

It is further reiterated at Paragraph 138 that when defining Green Belt Boundaries, the LPA must be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

Fundamentally Councils should be allocating land outside of the Green Belt in preference to altering its defined boundaries, where land which fulfils the definition of sustainable development exists and is available and deliverable within the plan period.

Whilst it is the intention of the Council to look to submit its Local Plan Review for examination moving towards 2019, the Council must be mindful of the fact that the currently Draft NPPF 2018 is likely to be released and come in to force

in the upcoming weeks. The new NPPF will therefore have a fundamental bearing upon development throughout the remainder of the proposed plan period; 2016-2033, and the Council's future strategy for the delivery of housing will need to be developed in accordance with the new Framework and its requirements. It is important that steps are put in place at this stage to embody and react to the policy change.

The Council must expressly justify the release of land from the Green Belt at this stage in favour of the delivery of other available sites which are not located within the designation and meet the definition of sustainable development. It should be recognised that the District is highly rural in its nature with modest sized settlements and a significant dependence upon private vehicles as a result. It is not reasonable therefore to consider the need to travel alone as a determinative factor in assessing the sustainability of a site, particularly when the development would represent the best use of underutilised and previously developed land. This is reflected at Paragraph 34 of the NPPF and further within the PPG where the section on 'supporting sustainable rural communities' states that *different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas*; according with Paragraph 29 of the NPPF.

The Site

The site in question does not lie within the Green Belt and is contiguous to the proposed allocation 'Moreton Quarry' and form the interface between the proposed allocation and Warmwell Road. The site is, for planning purposes, white land, over which there are no environmental or landscape constraints.

The site is identified on the enclosed plan in red, against the wider proposed allocation of Moreton Quarry, in blue, for the purposes of clarity.

With the site not subject to any significant environmental or landscape constraints the only reason why the site cannot be delivered is that it lies outside of a defined settlement boundary. There is no reason why the Council should not seek to bring it forwards for development as part of the strategic planning process; being located outside of the settlement is not a barrier to allocation in this regard.

The existing pattern of development is comprised of a single large dwellinghouse set within a substantial plot, which does not make best and most effective use of the land. There is clearly an opportunity here for this site to be either embodied in to the wider allocation, providing opportunities for access or further development accessed from an internal estate road to the development, or for the site to redeveloped alongside the wider allocation and infrastructure

improvements in terms of services and facilities which will be delivered as part of the development.

The surrounding pattern of development is residential in its character, local residential development is in the main of a higher suburban density. The promoted site and its neighbour are in the minority as large detached dwellings within very generous plots. The area is clearly capable of accommodating a higher density form of development in accordance with the prevailing character of the area. The other adjoining land use is that of the redundant quarry, which is being considered at this time for allocation for what will be tantamount to creation of a new settlement.

The proposed land parcel is clearly located in a suitably sustainable location where the Council considers that significant further housing growth can be supported. The redevelopment of this site alongside or as part of the allocation, for residential development should thus also be supported.

Physical and Environmental Constraints

The site is considered a strong candidate for re-development; the access from Warmwell Road is at a point where there is good visibility in both directions and the site would be readily capable of taking an upgraded junction to facilitate this.

The site measures approximately 0.9ha. the main body of the site is relatively open and free from constrains with both the eastern and western boundaries tree lined. There is also a grouping of trees at the southern end of the site. None of the trees on site are protected and a number of these are relatively poor specimens.

The topography across the site is relatively level. There are no issues of flooding or contamination on the site. The land is located within the blanket designation Flood Zone 1 and, as such, is subject to a less than 0.1% chance of flooding occurring each calendar year.

Whilst no part of the site falls within a protected designation of the Dorset Heathlands SPA the site does fall within the 5km buffer zone and thus appropriate mitigation would need to be delivered as part of any development. The indicated land lies outside of all other protected designations of National and European importance and/or buffer zones thereof.

The landowner is willing to make the site available for development now.

The New Homes for Purbeck Consultation Document

The Council has adopted the position that it needs to allocate sufficient land to deliver only 1700 additional homes within the plan period 2016-2033. This is on

the basis that it considers that it has already planned to deliver 1200 homes as part of its current strategy, which will also come forwards during the plan period; taking to total to 2900 homes; approximately 161 dwellings per annum over the plan period.

The 1200 homes which the Council suggests will come forwards as an aside to the new allocations comprises;

- 90 homes completed between April 2016 and March 2017;
- 370 homes that have planning permission but have not yet been built;
- 500 homes which could be built under current policies, including on previously developed land;
- 150 homes allocated at Swanage; and,
- 50 homes allocated at Lytchett Matravers within the adopted plan.

The Council is putting a significant reliance of the delivery of 500 homes within the plan period by way of windfall development. At the time of the examination of the 2012 Local Plan the Council did not make any allowance for windfall development in its delivery projections, however the Strategic Housing Land Availability Assessment (SHLAA) January 2018 indicates that since 2006 approximately 77% (1142 dwellings) of the District's supply has been delivered by way of windfall development. The fact that this has been the case to date however is not sufficient indicator that this will continue. The Council did not have any Local Plan in place prior to the current document; adopted in 2012. For the first 6 years of the plan period therefore there was less control on development with applications defaulting to being determined in accordance with National Planning Policy in the absence of any up to date plan. Delivery in the initial 4 years up to 2010 was significant and comprised almost wholesale windfall development whereas, thereafter, delivery fell off considerably from 2010-2015. To anticipate windfall delivery on anything like the same rate would therefore be misguided. The Council should provide appropriate justification for how the 500 homes it is suggesting can be delivered; having particular regard for the low rate of delivery in recent years, with the exception of 2015-16; when the strategic allocation west of Wareham came forwards.

There is no evidence at this time therefore to suggest that this figure is likely to be achievable.

The New Homes for Purbeck consultation document proposes three potential options for the delivery of the 1700 additional homes the Council suggests it needs to plan for across the plan period;

- Option A represents a hybrid approach of Green Belt release at Lytchett Matravers and Upton and development of less constrained land at Wool settlement, 250 homes on unidentified smaller sites across the District and a significant new community development south of Moreton; on the furthest fringe of Purbeck District. The new community proposed at Moreton will be reliant on new infrastructure provision and the services and facilities within Crossways; which sits within West Dorset District. The expectation that 250 homes will be delivered by way of a collection of smaller sites for up to 30 dwellings does not appear to have been appropriately evidenced and there is no confirmation of where these sites will be and whether they are actually available or deliverable. Given that several of the sites proposed for allocation at Wool and Lytchett Matravers would deliver less than 30 units each and are considered of sufficient scale to allocate, it is inconsistent and somewhat unreasonable for the Council to place a significant degree of uncertainty on the delivery of 250 homes – just under 10% of the indicated housing need. This does not provide an adequate degree of certainty that the Council's housing needs can be met which fails the tests of Paragraph 47 of the NPPF (2012) and thus this approach would not meet the tests of 'soundness' set out at Paragraph 182 of the NPPF in that the plan would be neither positively prepared nor effective.
- Option B seeks to direct the housing supply in the main to the settlement of Wool and the new community south of Moreton, with the remaining 250 homes to be again delivered on yet unidentified sites. Taking this approach would put significant strain on the settlement of Wool in terms of its existing infrastructure; moreover, given the number of sites and sheer amount of development it is unlikely that new homes will be delivered at a sufficient rate to meet the Council's housing needs, with developers not wishing to flood the local market and in turn harm sales prices and profitability. Again, the absence of any certainty on where the other 250 homes required will be delivered is not reasonable and will not pass the tests of soundness.
- Option C seeks to direct even more development to Wool – not less than 800 homes and 600 homes within the new community south of Moreton. Delivering the housing in this manner will further exacerbate the strain imposed on Wool and further hamper actual housing completions to the extent that the Council is unlikely to be meeting its projected housing delivery figures. It is not rational to expect that developers will seek to bring forwards several of these sites in tandem and flood the market with new homes; the reality is that only a limited number of units will be delivered per annum.

With all three options there are serious concerns over the ability for Wool settlement to (1) accommodate this level of growth given the need for significant infrastructure improvements and for the delivery of a new school, and (2) due to significant flood risk considerations; both for fluvial and surface water flows, at Wool which have not been appropriately investigated. Several of the sites are subject to high surface water flooding risk in isolation which would need to be managed. It is important however that the Council takes a holistic view to the potential for the cumulative development of all of the identified greenfield sites contiguous to the settlement to put a significant pressure upon and increase the risk of flooding across the settlement in general with a significant increase in the level of built form and hard surfacing and diminishing of the land's capacity for natural infiltration.

The Council's current approach in Options A & B of leaving 250 homes unallocated to be delivered on suitable smaller sites of up to 30 units across the District is not reasonable. The Council has already accounted within its suggested available housing supply of 1200 homes, for the delivery of 500 dwellings in accordance with the policies in the existing Local Plan. In combination with the additional 250 homes to be delivered on yet unallocated sites there is an expectation that 750 homes will be delivered via windfall development within the proposed plan period.

In reality there are not sufficient sites which sit within or on the edge of existing settlements which can be readily brought forwards for development of approximately 30 homes in accordance with suggested small sites policy. Many of the settlements within Purbeck District are constrained by either the Green Belt or protected designations of the Dorset Heathlands, or are located within the protected landscape of the AONB where exceptional circumstances would need to be demonstrated to justify the development. It is not reasonable to expect significant development to come forwards in this manner without a directed planning policy approach.

It would be far more appropriate for the Council to seek to provide more certainty for the general public, landowners, stakeholders and developers, by actually allocating sufficient sites to meet the Council's needs. If additional land comes forwards during the plan period and the Council exceeds its housing needs target, then this is not an issue. Housing need is not a maximum figure, but rather a minimum. The purpose is to ensure that the objectively assessed needs of the District are met by delivering at least the required amount of housing. The Council should not be a barrier to the development of sustainable sites.

The promoted site can reasonably be brought forwards as part of the wider allocation at Moreton and contribute towards addressing the lack of certainty in

respect of the Council's allowance for both windfall housing and additional sites on the edge of settlement for up to 30 dwellings; without these being formally allocated.

It is unrealistic to leave such a degree of uncertainty in respect of the Council's smaller sites policy which will be hampered by the environmental and landscape constraints within the District. In order to be effective, the Council should instead seek to allocate sites now and provide certainty and ensure the approach can be found sound. The recent rates of delivery within the District are indicative of the fact that the current Local Plan policies do not allow for sustainable development to come forwards in this manner, particularly on sites of up to 30 units as is suggested. There is no justification for this policy rationale.

Housing Delivery to Date

The Council has recently published what it considers to be an up to date Five Year Housing Land Supply Report; covering the period April 2017 to March 2022, but also setting out its figures for completions to date and its performance in respect of the overall housing needs for the plan period.

The report confirms the Council's position that it can demonstrate in excess of a 5-year supply of deliverable sites based on its performance to date within the plan period. Unfortunately, the forecasts set out within the document are not correct.

The Council has stuck rigidly to the belief that it needed to deliver only 120 dwellings per annum over the course of the plan period since its adoption in 2012. Unfortunately, the Council has not properly taken in to account the EiP Inspector's Report which, whilst recommending adoption of the Purbeck Local Plan 2012 at that time, made clear that the Council's housing figures were inadequate and needed to be reviewed immediately. The Inspector stated that a partial review would need to be undertaken, commencing in 2013 and to be in place by 2017, based on the Strategic Housing Market Assessment 2012 which projected a requirement for not less than 170 dwellings per annum to be delivered across the plan period.

The EiP Inspector stated clearly that the Purbeck Local Plan Part 1 (2012) was to be found sound as there was no other established policy framework in place due to failings with previous plan documents. Whilst allowing the plan to be made, the Inspector did not consider that it was sound in respect of its approach to housing. He was clear in his report that *policies regarding housing supply would be immediately out of date* and that the Council was only being allowed to proceed on the basis that it agreed to undertake an immediate review commencing in 2013 with the new plan to be adopted by 2017. Failing this its

plan would be out of date and it would not be able to rely on its out of date delivery strategy.

The EiP Inspector was very clear that this figure whilst appropriate for the short term; i.e. the first 5 years of the plan period, it was not appropriate for the medium or long terms and that the Council should instead amend its housing needs figure to 170 dwellings per annum (dpa). The EiP Inspector required specifically that the need to fundamentally review the housing position and adopt a figure of 170 dpa be written in to the Local Plan Part 1.

The Council has not reflected the fact that a more up to date assessment of its housing need was undertaken during the course of the adopted Local Plan preparation and examination and thus should have formed the starting point for its housing needs since 2012, as directed by the Inspector. The Council has not updated its housing need projections as it was required to do and, as a result, the housing requirement figure for the next 5 years is completely inaccurate.

In reality therefore, the Council has underdelivered on its housing needs to date within the current local plan period;

(1)

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 850 dwellings (170 per annum)
Total Need to Date	– 1570 dwellings

Recorded Completions 2006-2017	– 1476 dwellings
Performance Relative to Need	– <u>94 dwellings shortfall</u>

Assuming the Sedgefield method of addressing housing shortfall is employed.

5-year requirement 2017-2022	– 987 dwellings (170 per annum plus shortfall and 5% buffer)
Annual Requirement 2017-2022	- 197.4 dwellings

(2)

Even if we assume that the housing need figure should remain at 120 dwellings per annum until the 2017 deadline set by the inspector for undertaking and adoption of the Local Plan review;

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 600 dwellings (120 per annum)
Total Need to Date	– 1320 dwellings

Recorded Completions 2006-2017	– 1476 dwellings
--------------------------------	------------------

Performance Relative to Need – 156 dwellings surplus

Remaining Need to 2027 – 1622 dwellings
(170 per annum minus oversupply and adding 5%
buffer)

5-year requirement 2017-2022 – **811 dwellings**

Annual Requirement 2017-2022 - **162.2 dwellings**

Taking either projection in to account the Council cannot demonstrate a 5-year supply based on the 618 dwellings which it has projected are available and deliverable. This would amount to **3.1 years** of supply in the worst-case scenario (1) and **3.8 years** of supply in the best-case scenario (2).

The result is that the Council does not have sufficient land to meet its needs in the short terms and should be planning for additional development to ensure that its needs can be adequately met.

This absence of a deliverable 5 year housing land supply puts in jeopardy the figures set out within the New Homes for Purbeck consultation document – particularly that the Council has allowed for 500 dwellings by way of windfall provision; that would comply with current local plan policy, in addition to 250 dwellings which the Council considers a can be brought forwards within the plan period as part of a small sites policy for less than 30 dwellings. There is simply no justification for these figures and no evidence to demonstrate that this is in any manner achievable. A position which is backed up by the Council's recent competition statistics for 2016-2017 which stands at just 89 units. It is also relevant to note that this does not tally with the 90 homes stated by the New Homes for Purbeck Consultation Document.

The Council commissioned as part of its plan review, the preparation of a formal assessment of its objectively assessed needs for the period 2013-2033. The document prepared by GL Hearn states that the annualised housing need for the District during this period amounts to **173 dwellings per annum**. Updating the projections on this basis puts the Council in an equally bleak position of **3.2 years of supply** at present based on the Sedgfield method of addressing any shortfall within the next 5-year period. It is worth noting that even employing the Liverpool method would leave the Council without a deliverable 5-year supply.

Considering the above, the Council should therefore be planning for the delivery of not less than 3460 homes from 2013-2033. The Council's completion figures between 2013 and 2017 amount to 460 dwellings. The result therefore is that the Council should be planning to deliver not less than **3000 additional homes** as part of the Local Plan review.

The Proposals

There are several opportunities presented by the proposed site; whether redeveloped alongside the strategic allocation for housing, providing demonstrable value as an opportunity to provide an additional access in to the wider development site or as an additional parcel of land which could be brought in to the allocation.

In terms of its own development potential the site is of sufficient scale to provide approximately 8-10 dwellinghouses, as per the indicative layout submitted, of which a policy compliant provision could be provided as affordable housing.



The value of the land however may be much greater in contributing to the wider development opportunity in facilitating easier access along the north-western edge of the site and providing additional land for development. At present there is a projecting parcel of land which adjoins the Warmwell Road frontage, forming part of this allocation, but this is heavily timbered and itself is too narrow to provide a substantial level of development within. In combination with our client's land however, there would be a much greater extent of road frontage and in combination this projecting element to the highway provides a meaningful development opportunity which could be positively master planned as part of a wider scheme.

The landowner would be willing to engage positively with the wider landholder in order to achieve a cohesive development in this respect.

Conclusion

The New Homes for Purbeck Consultation Document seeks to allocate land for an additional 1700 homes; supplemental to 1200 which it considers can and will be delivered without any additional allocations. Even if all of the projected housing comes forwards as suggested, the Council will still be short of meeting its housing and this does not account for an appropriate buffer of sites for non-delivery.

The Council should therefore look to allocate additional unconstrained sites which can be delivered in a sustainable manner. The fact that sites lie outside of a defined settlement is not an issue at plan making stage.

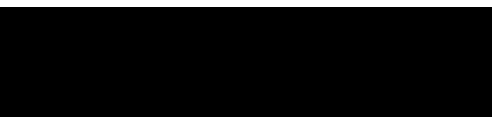
The landowner is willing to make their site available now and thus it can be delivered within the next 5 years in order to assist the Council in meeting its housing needs; whether forming part of the wider allocation or being brought forwards for housing alongside it. The Council must take a pragmatic approach to the allocation of sites to ensure that it is not left in a position without an up to date and adopted plan which will inevitably lead to planning by appeal; having parts of a wider strategic allocation that can be brought forwards in an earlier timeframe will assist this.

The Council should reasonably and justifiably consider the formal allocation of the site for housing development within the Core Strategy Review.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and notified of any further consultation periods.

Yours sincerely

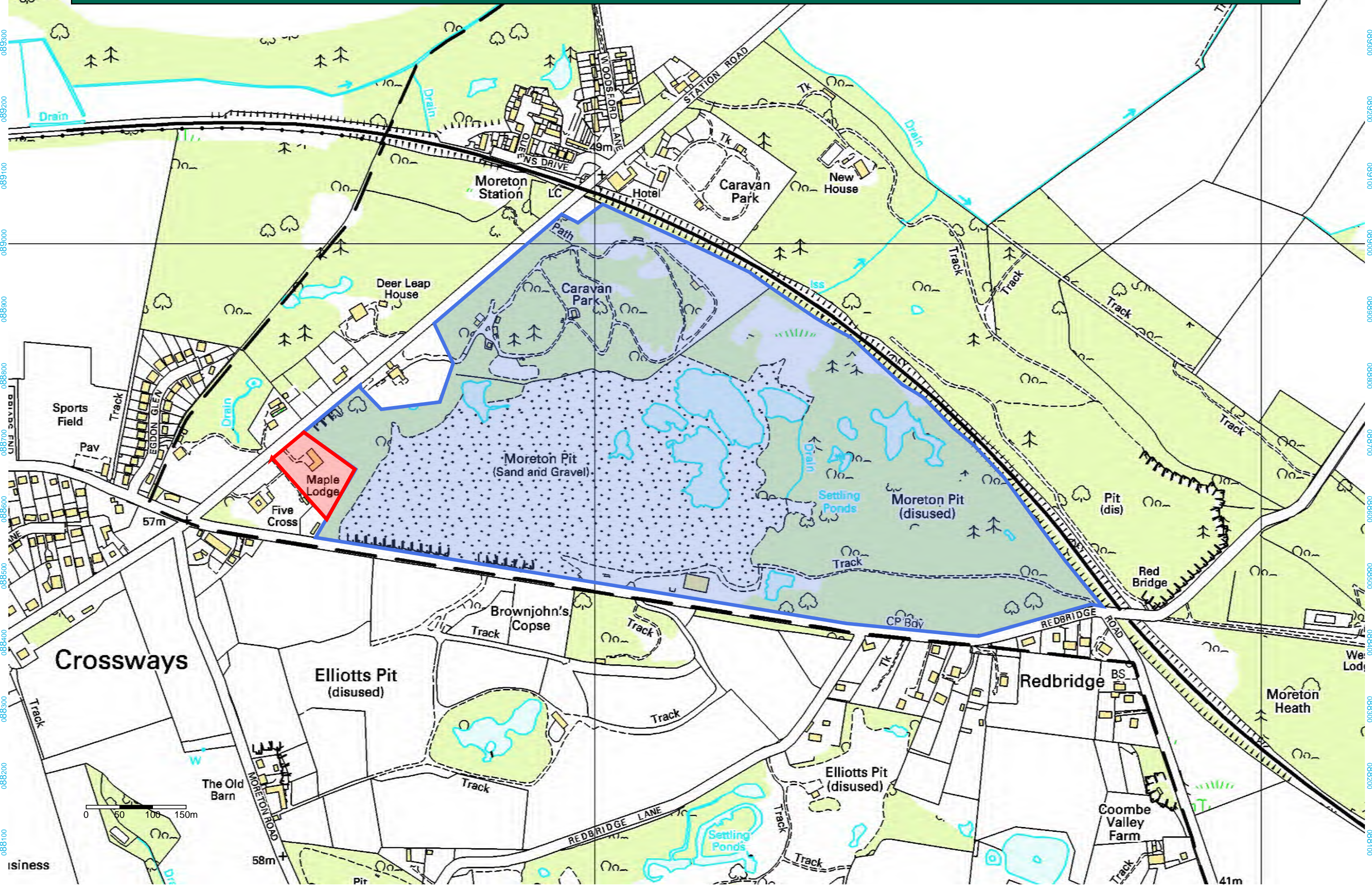


Adam Bennett BA (Hons)
Town Planning Consultant

Enc.

Site Location Plan

Indicative Layout Plan – prepared by LMA Architects.





0 50m

Proposed Site Plan (1:500)

Rev.	Date	Details	Drawn	Checked
Issued for:				
PRELIMINARY				
Project/Client:		Project No:		
Maple Lodge, Dorchester.		LMA.18.001		
Cicero Estates		Dwg No:		
		SK001		
Drawing:		Rev:		
Proposed Sketch Plan		Scale:		
		1:500 @A3		
Drawn By:		Date:		
*		08.02.18		
Checked By:		Date:		
*		*		

3rd Floor
70-74 Norwich Avenue West,
Bournemouth,
BH2 6AW

T 01202 375818
info@lmaarchitects.co.uk
www.lmaarchitects.co.uk



Comment

Consultee	Ms Jane Keogh (1190934)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Jane Keogh (1190934)
Comment ID	PLPP276
Response Date	02/12/18 22:41
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H8 West Lulworth

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The Purbeck Plan must justify the need for increased housing in West Lulworth if it is to be considered sound. Any increase in housing needs to be supported by a suitable infrastructure- education, transport, healthcare, amenities and sanitation. Local public transport is woefully inadequate for present needs, (this is not a situation unique to West Lulworth), with no regular service to shopping areas, train station

or healthcare facilities. Those living in the village are forced to rely on cars for transport; any increase in housing would mean a parallel large increase in local traffic volume in the village and an equal increase in parking needs. This is already an impossible situation in the summer months with the tourist influx. The nearest healthcare facility is 5 miles away in Wool and is overwhelmed by patient demand. This does not seem to have been taken into account in the Purbeck Plan. The local shop closes during the winter months and although smaller shops remain open throughout the year, they cannot supply more than very basic supplies to those living in the village. With the previously mentioned public transport situation the village does not have the infrastructure to support the proposed level of development. The local sewage system could not cope with the increased number of households suggested- it is barely coping with the demands of the present population. The sites proposed at Bindon Road/Sunnyside road do not have adequate highway facilities for any level of increased development. Both roads are unmade tracks and Sunnyside Road in particular has housing on both sides, so no way of increasing access to any new build. Both these roads are totally unsuitable for an increase in traffic flow.

The 8 sites proposed for the village of West Lulworth represent a potentially massive increase in the total population of the village, this is a major development plan not a small scheme.

The Government requirement for increased housing within the country is in response to the lack of homes crisis that has developed in the last few years as the population has increased. It is not a crisis of holiday home or second home supply. The reality is that most homes built in West Lulworth will be bought as either a second home or a holiday home. Estate agents are specifically recommending the village for this type of purchase. This does not seem to comply with the concept of delivering homes for local people.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

A realistic study of the infrastructure of the village of West Lulworth needs to be undertaken before numbers of new build are allotted to any sites under consideration.

A statement as to how the proposed development plan would improve the quality of life of the local community should be made.

The information as presented is not easily understood- a map showing proposed developments would be very helpful.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Ms Jane Keogh (1190934)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Jane Keogh (1190934)
Comment ID	PLPP279
Response Date	02/12/18 23:45
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Environment Small sites West Lulworth

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The Purbeck plan as it relates to proposed development in West Lulworth does not seem to take into account the unique biodiversity, history and geology of this area as referred to in paragraph 49. The small sites as outlined in the plan do not seem to have been analysed in depth with reference to the AONB, SSSI and Conservation Areas that would be affected or compromised. Development in West

Lulworth on the scale suggested by the Purbeck plan would potentially have a major impact on the biodiversity of this immediate area, in particular the allotment area in Bindon road that backs onto Bindon hill and is an almost undisturbed haven for many species of flora and fauna.

Paragraph 50c refers to the aim to improve the resilience to climate change and mitigate against flood risk. The construction of over 100 properties within the environs of the village with associated access facilities would dramatically increase the risk of water run off, soil erosion and flooding. This is already a problem with increased cultivation of surrounding fields and a lack of contour ploughing. As severe storms and increased rainfall in the winter month is predicted as an inevitable consequence of climate change, the effect of building on even small areas of land within the village, which occupies a catchment area, will seriously increase the risk of flooding.

West Lulworth has a clear skies policy that is an important attraction for tourists. The building of the volume of housing proposed in the Purbeck Plan is likely to require a level of lighting that would threaten this status.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Consultation with relevant bodies (RSPB, Butterfly Conservation, Dorset Wildlife Trust etc) should take place before any proposals are made as to building on the 8 sites proposed in West Lulworth. Surveys should be undertaken to assess the specific geological situation of the village and the relevant flooding and possible erosion risks that apply.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Mr Ben Read (1190999)
Email Address	[REDACTED]
Company / Organisation	Black Box Planning
Address	PO Box3366 Bristol BS6 9PB
Consultee	(1191005)
Email Address	[REDACTED]
Company / Organisation	Kingfisher Resorts
Address	Black Box Planning PO Box 3366 Bristol BS6 9PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Kingfisher Resorts (- 1191005)
Comment ID	PLPP310
Response Date	03/12/18 10:59
Consultation Point	Policy E8: Dorset heathlands (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	E8
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Kingfisher Resorts recognises the importance of protecting national, European and internationally protected nature conservation sites, as set out in Policy E7. The underlying assessment test in such cases is the impact of the proposed development on the identified sites i.e whether they have an adverse impact on the designated site.

However, Policy E8 is inconsistent with this test and is not justified in accordance with the provisions of paragraph 35 of the NPPF. The first paragraph, as currently worded, sets out a statement which is consistent with Policy E7 and establishes the core objective test in only allowing development that would not have an adverse effect upon the integrity of the Dorset Heathlands. However, the second paragraph goes on to require refusal of all residential and tourist accommodation within 400m of heathland. Whilst it does acknowledge one exception to this in the provision of nursing homes, it does not recognise any other exceptions. The second paragraph is unsound as currently worded.

There are a number of circumstances where development may be acceptable and does result in the net increase in dwellings or holiday accommodation units. For example, where proposals may include redevelopment of existing facilities, such as a hotel, to make provision for an alternative form of accommodation comprising individual units that will not have any greater impact on the designated area. The core test remains the impact on the designated area, not the number of units. Accordingly, Policy E8 requires further explanation and recognition of alternative scenarios.

Tourism accommodation can be provided in a number of formats and it is necessary for tourism businesses to be able to respond to changing market requirements, including in the provision of accommodation formats. As currently worded, Policy E8 is unnecessarily restrictive.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Policy E8 requires additional wording which does not preclude development which may increase the number of dwellings/units of tourist accommodation but does not have an adverse impact on the designated area. For example, where proposals seek to redevelop an existing tourist facility.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

The issue has potentially significant economic implications and whilst the change proposed is relatively minor, if the LPA are resistant to such a modification it will be necessary to discuss matters in more detail.

Comment

Consultee	Mrs Louisa Kingman (1190862)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Louisa Kingman (1190862)
Comment ID	PLPP200
Response Date	01/12/18 16:03
Consultation Point	Wool - 470 homes, 65 bed care home, SANG, community hub and recreational space (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H5
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

First of all i dispute that 470 homes are required for Wool. first we were asked to consider 1000 homes and this has now been reduced to 470. No reason has been given for the reduction or how this lower number has been arrived at. The number is out of proportion to the number of households already in Wool and East Burton ie 1200. With no regard to corresponding infrastructure being put in place Wool will become an overcrowded dormer town. Traffic will be greatly increased overloading an already difficult situation with traffic queuing at the train station.

No extra doctors are promised to an already overstretched surgery. No extra places are proposed in the schools.

We now have a plan for a care home with no previous mention of this and no idea whether this is required. It would be the largest building in Wool. Where would the staff come from as it is unlikely they would be able to afford prices in Wool.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Any housing would need to be truly affordable, taking into account local wages 20% reduction would still not be affordable by local working people. Employment would need to be local or infrastructure put in place for extra traffic travelling to Poole or Dorchester for employment. Schools would need extra places and more doctors would be required though recruitment for doctors is already a problem.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Christopher Kirk (1190152)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Christopher Kirk (1190152)
Comment ID	PLPP266
Response Date	02/12/18 21:11
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 149

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The plan is for a council which will cease to exist before it can be implemented.

It is unsound because, with regard to scale:

There are 107 new houses proposed for West Lulworth. This is greatly in excess of the 30 homes suggested as a maximum (and is more than the 100 proposed for Bere Regis), and certainly cumulatively harms character and value of the village.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Define a real upper limit to the total number of new homes, as a percentage of the existing size of the settlement, that be granted planning consent.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Christopher Kirk (1190152)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Christopher Kirk (1190152)
Comment ID	PLPP268
Response Date	02/12/18 21:17
Consultation Point	Policy I2: Improving accessibility and transport (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	Policy I2: Improving accessibility and transport
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The Local Plan is being produced for a body which will cease to exist within a year.

Policy I2, while it contains laudable aims, is unsound in regard of the proposed developments in West Lulworth. These fail to meet the standards laid out in this policy, especially b, d, e and h. There is one DCT bus to Dorchester a week, and the tourist-oriented X54 bus between Poole and Weymouth. They do not comprise adequate public transport provision. The only viable means of travel to work or local health and education services is by car, and West Lulworth is already suffering severe congestion for much of the year.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

New developments should be in communities already served by public transport, or within 20 minutes easy cycle of work/services. Proposed developments in villages without such links should fund the provision of a new or extended bus route that will allow residents to access work and services.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Christopher Kirk (1190152)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Christopher Kirk (1190152)
Comment ID	PLPP270
Response Date	02/12/18 21:28
Consultation Point	Rural and entry level exception sites (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 176

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

This is a good policy (although it should be stronger - there are sufficient market rate properties and no more need be built).

It is important these rules apply to the proposed West Lulworth sites. The total need for the area is unlikely to reach the high level of building that all sites would generate.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The presumption should be that any new homes should be affordable to rent or buy by someone earning the average local wage (not the laughably out of reach "affordable" standard of 20% below market rate).

Comment

Consultee	Mr Christopher Kirk (1190152)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Christopher Kirk (1190152)
Comment ID	PLPP525
Response Date	03/12/18 19:15
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H8
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The Plan is being produced by and for a council which will cease to exist before any of the proposed developments can happen.

These proposals are unsound on the basis of the following local concerns:

The proposed “small sites” in West Lulworth add up to a substantial increase in the size of the village, adding a great deal of traffic to a village that already suffers from too many cars for its roads. This is entirely out of proportion to the needs of the village.

Of the proposed “small sites” in West Lulworth only two - Land adjacent to Hillside House, School Lane and Adjacent to the Hall, Church Road, West Lulworth – are not within the West Lulworth Conservation Area.

Three of the proposed sites - Land adjacent to 1 Church Road, Adjacent Cove House, Bindon Road and Allotment Gardens, Bindon Road - form a ribbon of development and should be regarded as one site.

The pattern of development outlined in the plots earmarked for West Lulworth would radically alter the character of the village, transforming an area of green fields with open views into a strip of closely packed housing, suburbanising a rural zone. As tourism is so vital to the regional economy it seems a poor idea to alter the image of the approach to the Cove in such a dramatic way.

The proposal to develop the Allotment Gardens on Bindon Road is particularly egregious as it removes a valuable resource for the village and reduces the sustainability of the community which the Plan seeks to promote.

Instead of “ only limited infilling, on sites positioned in-between existing buildings” half of the proposed sites link up to form a new ribbon of development.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

"the scale of proposed development is proportionate to the size and character of the existing settlement, up to a maximum of 30 homes;"

This needs rigid definition. What percentage increase is considered proportionate? Is 30 the maximum for the settlement's expansion? At present it seems that 6 sites, all under 30 houses each but over 100 in aggregate, is allowable. The Parish Council should decide what it regards as proportionate, and in character.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Christopher Kirk (1190152)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Christopher Kirk (1190152)
Comment ID	PLPP531
Response Date	03/12/18 19:39
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 146

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

This aspiration, in a plan being developed for a council that will not exist to oversee it, sounds nice.

However it seems hollow given the proposals - not included in this document but commonly available - for West Lulworth:

Of the proposed "small sites" in West Lulworth only two - Land adjacent to Hillside House, School Lane and Adjacent to the Hall, Church Road, West Lulworth – are not within the West Lulworth Conservation Area.

Three of the proposed sites - Land adjacent to 1 Church Road, Adjacent Cove House, Bindon Road and Allotment Gardens, Bindon Road - form a ribbon of development and should be regarded as one site.

The pattern of development outlined in the plots earmarked for West Lulworth would radically alter the character of the village, transforming an area of green fields with open views into a strip of closely packed housing, suburbanising a rural zone. As tourism is so vital to the regional economy it seems a poor idea to alter the image of the approach to the Cove in such a dramatic way.

The proposal to develop the Allotment Gardens on Bindon Road is particularly egregious as it removes a valuable resource for the village and reduces the sustainability of the community which the Plan seeks to promote.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Parish Councils should have a real, enforceable, say in what constitutes the "special and distinctive character" of their community. The views of residents should count for something.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Christopher Kirk (1190152)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Christopher Kirk (1190152)
Comment ID	PLPP532
Response Date	03/12/18 19:44
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 145

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Lulworth is unsuitable for development on the scale envisioned by the proposed combination of "small sites" as it exceeds the needs of the local community.

Access to services is not easy in the Lulworths - there is almost no public transport (the tourist-oriented X54 and one DCT bus a week to Dorchester) and any journeys to health, education, work or shopping facilities must be by car. The nearest GP is in Wool, over 4 miles away over a steep hill, for example.

I would not be surprised if other villages had the same problem as the general thrust of the proposals seems to be to build as much as possible.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Define "good access to services and facilities", "sustainability" and "small scale development" robustly. Without exact terms these are mere aspirations.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Christopher Kirk (1190152)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Christopher Kirk (1190152)
Comment ID	PLPP534
Response Date	03/12/18 19:53
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 147

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

West Lulworth has more than its share of second homes and – worse – homes bought to become holiday lets (usually owned by companies from outside the area). It is poorly suited to the infirm and elderly. Homes sold at market rates in West Lulworth will either become holiday lets or be bought be

people near or past retirement age, as the young cannot afford the "AONB Premium", and the distance from work and essential services.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Serious policies to prevent any properties built as affordable housing being sold as either second homes or commercial holiday lets should be a prerequisite of any Plan or planning application.

There should be a prohibition on building market rate housing in villages where more than 10-20% of existing properties are second homes or holiday lets.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Sarah Kirk (1190119)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Sarah Kirk (1190119)
Comment ID	PLPP377
Response Date	03/12/18 14:50
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Showing the overcrowding any development of the centre of the Conservation Area of W Lulworth would cause.
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

This online process is not easy for everyone, nor accessible for everyone. Especially for older members of the community.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Though I'm aware that these West Lulworth 'small sites' have been put on the back burner for the time being, I think it worth taking the time to make a note of why these sites are inappropriate for development. The mooted 108 new builds will come with possibly over 200 cars that will need parking, and when there are visitors to the new homes there will be even more cars. Access for the present dwellings are narrow.

Almost all the sites are within the Conservation Area in an AONB within a World Heritage Site which is surrounded by SSSIs. That alone should be enough to rule these sites out.

The only type of homes needed in the village are affordable ones. The small sites will not deliver enough of these, and it is unlikely that they will be truly affordable to local young people. Additional summer lets or holiday homes will not add to the year round vibrancy of the community.

During peak tourist season the roads of W Lulworth become gridlocked due to unmanageable numbers of tourists and local residents are either trapped at home, or have to be prepared to sit in traffic for 40 minutes to get in/out of the village. Access for vital services: ambulance, fire, coastguard and Police should be a prime consideration in a small village that is forced to host circa a million visitors per annum.

Our local GP surgery in Wool struggles to care for the present population. Before we add more people to their lists it would be responsible to ensure there was proper healthcare provision in place. Being shunted off to A&E is not proper GP care.

West Lulworth's transport links are woefully inadequate. It is not possible for a resident to get to and from work using what passes as a bus service here.

West Lulworth/Lulworth Cove used to be one of the small jewels in Purbeck's crown. It was quaint, pretty - the perfect destination for low key bucket and spade holidays, and largely unspoiled by too many modern developments. Sadly this has not been the case of the last 2 or 3 decades. So many inappropriate and insensitive new builds have been permitted. It is a great shame.

If you have any supporting documents please upload them here.

Showing the overcrowding any development of the centre of the Conservation Area of W Lulworth would cause.

Showing the overcrowding any development of the centre of the Conservation Area of W Lulworth would cause.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Sarah Kirk (1190119)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Sarah Kirk (1190119)
Comment ID	PLPP381
Response Date	03/12/18 14:55
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Forward to the Purbeck Local Plan

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The complexity of the process for ordinary locals to comment on this seems to be designed to discourage their involvement in decisions that will make a huge difference to the quality of their lives in their villages and towns. It disenfranchises the many locals who don't have computers. The time we have been given to read all this info and try and get to grips with terms like 'legally compliant' and what it means

in this context seems set in favour of the developers and landowners, not on a level playing field (they'll be built on next I guess). The locals will have to live with the consequences of the plans. Purbeck Council as it is now will not have to answer to anyone because it will be gone. We will have no redress.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The Local Plan can only be sound if it complies with its own statements / declarations of protection for the AONB, the Conservation Area, World Heritage Site, and SSSIs

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Sarah Kirk (1190119)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Sarah Kirk (1190119)
Comment ID	PLPP382
Response Date	03/12/18 14:57
Consultation Point	Support sustainable community growth to provide for the needs of local residents (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H11
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Claims as to the % of affordable housing that these new developments will deliver is presented in a misleading fashion. 30%? or is it 20%? Or is it at the discretion of the Council in the end? The use

of 'small sites', the possibility that developers may persuade the Council to change the numbers if the profit margins look a bit off....I'm not filled with confidence in the process.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Housing developments should consist of properly affordable rental homes provided (preferably) by the Council - not for sale - but part of social housing stock - for the housing of genuinely local families. The second home market is already adequately supplied and, as the plan states: buoyant. It would be appropriate for councils to provide a bit of buoyancy for locals who need to live and work in their home villages so they can remain near family. I'm concerned that the present PDCouncil will be dissolved by the time these plans come around again. There is no accountability.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Sarah Kirk (1190119)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Sarah Kirk (1190119)
Comment ID	PLPP385
Response Date	03/12/18 14:59
Consultation Point	Assessing flood risk (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy E4

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

This online process is not easy for everyone, nor accessible for everyone. Especially for older members of the community.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Building on small or large pockets of green - allotments, pasture etc. will increase flood risk as there will be nothing to slow down the run off, nor to soak it up. Purbeck already has poor farmland drainage that floods the roads now. With climate change making its presence increasingly felt this will only get worse. Every tree, hedgerow, pasture, green space that's concreted over by developers will contribute to flooding in this area.

Comment

Consultee Mrs Elaine Knight (1189990)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Mrs Elaine Knight (1189990)
Comment ID PLPP328
Response Date 03/12/18 13:09
Consultation Point Policy H2: The housing land supply ([View](#))
Status Processed
Submission Type Web
Version 0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H2

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

This plan shows that 933 homes will be built on Small Sites. However, in the Purbeck Plan that was submitted for consultation in Spring 2018, (Options A and B) only 250 homes were allocated to Small Sites. This, I feel is a valid reason for stating that the Plan is unsound.

95% of respondents (Fig 3) in the Spring 2018 consultation stated that development should respect the character and distinctiveness of towns, villages and countryside. 94% stated that adequate parking should be ensured. Neither of these points could be achieved with over 2000 homes being built in Purbeck.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Elaine Knight (1189990)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Elaine Knight (1189990)
Comment ID	PLPP346
Response Date	03/12/18 13:43
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The plan states (para 145) that housing growth should be directed to settlements with good access to services and facilities. The services and facilities in West Lulworth are minimal. The whole infrastructure

of - public transport, sewage, and the gridlock of traffic in the summer months needs to be addressed before it could be considered that West Lulworth has good access to services and facilities.

The plan also states that "individually and cumulatively" the proposed homes must not harm the character and value of any landscape or settlements affected. Eight small sites comprising 108 houses in West Lulworth would, cumulatively, seriously affect the character of the village. Tourists come here because it is quaint. They will not come if the village becomes a housing estate.

The plan states that "small scale development is to support rural communities". Increasing housing stock, with out addressing the infrastructure does not support, it harms, rural communities.

Road traffic and parking is a huge problem in the village. None of the Small sites identified, appear to have taken into account that the occupants of each house will come with at least 2 cars. On this point alone, I consider the plan to be unsound.

All the sites outlined for West Lulworth should all have been discounted due to their development having an adverse impact on the special character of the village within the AONB. Therefore they should have been classified as unsuitable for development in the SHLAA

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The eight small sites in West Lulworth should be shown on ONE map. This would indicate more clearly the scale of the proposals, and that they are not proportionate to the size of the existing village.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Andrew Lance (1190631)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Andrew Lance (1190631)
Comment ID	PLPP226
Response Date	02/12/18 11:09
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H14

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Whilst the policy appears to address the issue of second homes, it does not go far enough to protect us against the impact of holiday lets on our communities. Indeed, the council telling us that we 'need new homes' is contradicted by their unwillingness to ensure that new houses are not taken out of full residency because they become empty due to being used as holiday lets. I have seen a second homes

evidence paper 2017 which promoted a full residency policy but unfortunately the council have ignored this evidence.

The council have stated that holiday lets offer some economic benefit to our local area, however, there is no evidence to support that in any of the evidence papers. In fact, the anecdotal evidence from residents supports a full residency policy and the benefits of this far outweighs the councils claim of any economic benefit. In contradiction to item 5, [bullet point 3, second home evidence paper], small businesses currently qualify to receive full small business rate relief meaning that many don't contribute in any way to our local taxes and services and therefore don't contribute to the police, ambulance and fire brigade etc even though they have full use of the facilities.

All holiday lets are someone's second home but run as a business by individuals, who live outside of our area and predominantly out of county. This means that the majority of money earned leaves our area to be spent elsewhere or even, in some cases, abroad. I see, in our village, supermarkets delivering food sometimes more than once a week so that money isn't being spent here. There is no proof that holiday lets provide more than a marginal benefit to any community. I have heard it said that they are of equal benefit to other holiday makers. This is not true. As I've already said with all the supermarket deliveries holiday let patrons are not dependant on local pubs and restaurants as is the case with holiday makers staying in hotels and B&Bs.

Holiday lets and second homes do NOT contribute in any way to the sustainability of smaller communities as they damage social fabric and community cohesion of our settlements, including their contribution to a changing population profile. They are not here to contribute to the upkeep of the churches and graveyards, help with other jobs like cutting grass, war memorial maintenance, running the village hall, taking part in fetes, community events, support the school, shop or pub. The owners are not here to support the parish council or more importantly stand for election! Their absence means that an ever dwindling number of people are responsible for a lot of work and this is set to increase with forthcoming devolution plans!

It is ridiculous for the council to exclude holiday lets from this policy as per item 3.9 in the evidence background paper. 2nd homes and holiday lets 'behave' in the same way. Both are empty for significant and unpredictable periods during the year, both have absent owners, both cause the cost of housing to inflate because of potential earning possibilities and both have an impact on social cohesion. Not addressing the effect of holiday lets by making a full residency policy across Purbeck [not just the AONB areas], contributes to making our villages even more unsustainable than they already are and, of course, contributes further to an affordability issue because of potential earning capacity regardless of whether they're within or out of the AONB.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The council needs to make the current second homes policy a full residency policy to ensure that the plan doesn't become a joke and housing is not lost to holiday lets as well as second homes.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee Mr Andrew Lance (1190631)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Mr Andrew Lance (1190631)
Comment ID PLPP227
Response Date 02/12/18 11:32
Consultation Point Policies List ([View](#))
Status Processed
Submission Type Web
Version 0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H11

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The real housing crisis is for genuinely affordable housing for rent and to buy. Item 164 [plan pre submission] indicates that 'almost 90% of the identified housing requirement' is for affordable housing. Unfortunately, that item goes on to say that the maximum proportion of affordable housing that's achievable is only 40%. This means that a huge number of people will not be served by this plan, and

a significant amount of development in our district will be inaccessible to local people and therefore pointless so who is it being built for.

The government definition of affordable housing is 80% of market value but there is general agreement that the government's definition of what's affordable is not affordable to the people that need it. The council knows [and have admitted] that the 'affordable' housing provision throughout Purbeck is for the most part unaffordable to the relevant demographic.

As the average income in Purbeck is £22,500.00 pa. Even with a deposit, an applicant would require a mortgage of approx. 12 times their income for a two bed AFFORDABLE dwelling. As mortgage providers generally only offer 3.5 times a household income, the demographic most in need will gain nothing from the plan.

The affordable rental market is just as unaffordable. At 80% of market value, significant numbers of people find the alleged 'affordable' rental market is sufficiently out of reach as to make it impossible for them to consider moving to their own home.

The LEP published a document in 2017 [5.22, Dorset-Future Housing Provision] which stated that '*In terms of absolute affordability, the standard measure is the income required for an 80% mortgage to a maximum of 3.5 times annual wage. By this measure none of the median priced new build dwellings are affordable even in the least expensive parts of Dorset*'. With a median income of £30,727 pa ALL new build housing in Purbeck is unaffordable! In order to afford an 'affordable' flat there would need to be an income of approx. £59,886pa.

I understand the issue of affordability is a country wide problem and one being ignored by central government, Purbeck has many designations, awards and world wide recognition. It is, therefore, very important that all developments ACTUALLY meet the needs of local people in real terms to ensure the sustainability of vibrant communities within our villages and towns without destroying our precious and economically important environment. This plan cannot deliver what is actually needed.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

We need all the affordable provision to be social housing. The council need to change this from 10% to the full 40%.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee Dr Andrew Langley (1191908)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Andrew Langley (1191908)
Comment ID PLPP587
Response Date 03/12/18 11:51
Consultation Point Policies List ([View](#))
Status Processed
Submission Type Letter
Version 0.3
Files [Langley-1191908.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Dr Andrew Langley (1191908)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Andrew Langley (1191908)
Comment ID	PLPP754
Response Date	03/12/18 11:51
Consultation Point	Policy H4: Moreton Station / Redbridge Pit (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	Langley-1191908.pdf

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Dr Andrew Langley (1191908)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Andrew Langley (1191908)
Comment ID	PLPP755
Response Date	03/12/18 11:51
Consultation Point	Policy I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	Langley-1191908.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination
Which policy / paragraph number / policies map does your comment relate to?	Many
<p>(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)</p> <p>Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.</p>	
If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?	Yes

Comment

Consultee	Dr Andrew Langley (1191908)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Andrew Langley (1191908)
Comment ID	PLPP756
Response Date	03/12/18 11:51
Consultation Point	Policy IM1: Tools for delivery - the Purbeck Local Plan implementation strategy (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	Langley-1191908.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	The submission of Local Plan to the Secretary of State for Public Examination
Which policy / paragraph number / policies map does your comment relate to?	Many
<p>(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)</p> <p>Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.</p>	
If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?	Yes

Comment

Consultee Dr Andrew Langley (1191908)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Andrew Langley (1191908)
Comment ID PLPP757
Response Date 03/12/18 11:51
Consultation Point Policy H12: Rural exceptions sites ([View](#))
Status Processed
Submission Type Letter
Version 0.1
Files [Langley-1191908.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Dr Andrew Langley (1191908)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Andrew Langley (1191908)
Comment ID	PLPP758
Response Date	03/12/18 11:51
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	Langley-1191908.pdf

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee Dr Andrew Langley (1191908)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Andrew Langley (1191908)
Comment ID PLPP759
Response Date 03/12/18 11:51
Consultation Point Policy H5: Wool ([View](#))
Status Processed
Submission Type Letter
Version 0.1
Files [Langley-1191908.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee Dr Andrew Langley (1191908)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Andrew Langley (1191908)
Comment ID PLPP760
Response Date 03/12/18 11:51
Consultation Point Policy H6: Lytchett Matravers ([View](#))
Status Processed
Submission Type Letter
Version 0.1
Files [Langley-1191908.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee	Dr Andrew Langley (1191908)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Andrew Langley (1191908)
Comment ID	PLPP761
Response Date	03/12/18 11:51
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	Langley-1191908.pdf

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee Dr Andrew Langley (1191908)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Andrew Langley (1191908)
Comment ID PLPP762
Response Date 03/12/18 11:51
Consultation Point Policy H7: Upton ([View](#))
Status Processed
Submission Type Letter
Version 0.1
Files [Langley-1191908.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee Dr Andrew Langley (1191908)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Andrew Langley (1191908)
Comment ID PLPP763
Response Date 03/12/18 11:51
Consultation Point Policy E3: Renewable energy ([View](#))
Status Processed
Submission Type Letter
Version 0.1
Files [Langley-1191908.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Comment

Consultee Dr Andrew Langley (1191908)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Andrew Langley (1191908)
Comment ID PLPP764
Response Date 03/12/18 11:51
Consultation Point Policy V2: Green belt ([View](#))
Status Processed
Submission Type Letter
Version 0.1
Files [Langley-1191908.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following: The submission of Local Plan to the Secretary of State for Public Examination

Which policy / paragraph number / policies map does your comment relate to? Many

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

Dr A Langley

██████████

██████████

████████████████████

Representations on the Purbeck Local Plan pre-submission draft and examination documents.

I request notification when the Purbeck Local Plan is submitted for examination.

I request the opportunity to appear before and be heard by the person carrying out the examination in order to clarify my representations and address any changes or responses to the examination documents following this consultation.

1 Habitats Regulations Assessment (HRA)

The HRA is not legally compliant.

1. It has not recorded in-combination effects with other plans or projects.
2. The screening stage does not record why a decision of "no LSE" for the Plan was reached against the conservation objectives of each of the screened sites.
3. It has omitted at the screening stage potential likely significant effects (LSE) on European sites.
4. Where LSEs have been identified, the appropriate assessments (AAs) are brief and incomplete.

1.1 In-combination Effects

The HRA does not list the other plans and projects that have been considered in-combination with Purbeck's local plan. For example, the West Dorset Local Plan would be relevant given the intensification of planned development around Moreton and Crossways in both authorities. Other plans and projects that are not part of Local Plans may also be relevant (e.g, discharge consents and water abstraction licensing, minerals extraction).

1.2 Omission of LSE

The water catchment area for the Frome (SSSI) and Piddle rivers is important for North Atlantic Salmon which are found there. This species is in critical decline¹² and the populations of the southern chalk-stream rivers has recently been identified as a genetically distinct sub-species

1 https://www.exeter.ac.uk/news/featurednews/title_636110_en.html

2 R Lauridsen et al "Fisheries research report 2017". Game and Wildlife Conservation Trust 2017.

which elevates its conservation importance³. Furthermore, the evidence supports the intermingling of populations in the Frome, Piddle, Avon, Test and Itchen. Therefore, any LSE on the Frome and Piddle populations would be relevant to the conservation objectives of the River Avon SAC and the River Itchen SAC.

The HRA identifies a LSE on the waters of the Frome. However, the LSE should be extended to include chemical change to the entire Frome/Piddle water catchment area and also the effects of water abstraction & waste water discharge on river levels, flow rates and temperatures. Phosphorus levels are known to be important⁴, and nitrogen levels in the Frome and Piddle are several times higher than those in Poole Harbour itself⁵.

Other LSEs might include disturbance by humans and pets, fishing, and other pollution.

LSEs on the Frome/Piddle catchment would be concluded for most of the Plan's main housing allocations, including Bere Regis.

1.3 Limitations of the AAs

The AAs are brief and do not systematically address each LSE and in-combination effects relative to the conservation objectives of each relevant European site.

Avoidance, rather than mitigation, is not explored.

The LSEs are defined too broadly. For example, "urban effects" covers a multitude of impact pathways each with a different effect⁶. Existing Supplementary Planning Documents (SPD) such as the The Dorset Heathlands Planning Framework 2015–2020 SPD and Nitrogen Reduction in Poole Harbour SPD cover a *subset* of these aggregated effects, but the AA should consider each effect to ensure that all of them have been either avoided or mitigated.

The Heathlands SPD relies heavily on SANGs to mitigate impacts even though some impacts are clearly not affected by a SANG. There is also doubt that SANGs are always effective mitigation (see e.g. 4.14–4.19 of the HRA), so do they remove "all reasonable scientific doubt" of LSE on the Heathlands?

As examples, abstraction of water and waste-water discharge are "urban effects" but they are not assessed; dog-walkers may be partly diverted to SANGs, but it is unlikely that horse-riders or off-road cyclists would be as SANGs are usually too small; residents may use nearby SANGs, but tourists may not, so Local Plans' tourism ambitions need to be included in any assessment of effect, especially as tourists tend to be most present during the bird breeding season. Urban

3 C. Ikediashi et al, "Atlantic salmon *Salmo salar* in the chalk streams of England are genetically unique" *Journal of Fish Biology* 92 (3) pp. 621–641, 2018.

4 C. Chapman "River Avon SAC Nutrient Management Plan for Phosphorus" Wiltshire Council 2017

5 G Bryan, D Kite, "Strategy for Managing Nitrogen in the Poole Harbour Catchment to 2035." The Environment Agency 2013.

6 Liley et al "Evidence to support Appropriate Assessment of development plans and projects in south-east Dorset" 2007 contains a fairly comprehensive list of potential impacts.

effects can even include targetted exploitation, like fungus collecting.

Mitigation is not clearly evidenced as being necessary and sufficient to ensure legal compliance of the Plan, nor clearly defined enough to be carried forward unambiguously into policies. As an example, if SANGs are necessary to make the Plan (as a whole) legally deliverable, how many are needed, where should they be, when should they be delivered, and what determines their size & characteristics? The Dorset Heathlands Planning Framework 2015–2020 SPD offers *guidance* on some of these matters, but it alone cannot guarantee that no LSE can be concluded. There are 933 houses on "small sites" in the Plan, none of which would in isolation require a SANG under the Heathlands SPD. Where does the Plan ensure that these sites are adequately mitigated?

Monitoring of SANGs for use is the wrong place to focus attention. It should be on the use of the heathlands. How could monitoring of the SANGs be judged "successful" when one could not know how many visits constituted a neutral or decreasing number of visits to the heathlands? Monitoring both would obviously supply the best evidence.

The HRA (sections 5.27 to 5.30) raises concerns about the lack of certainty about SANG provision. SANGs themselves are large developments and need to comply with HRA and other environmental legislation and should have been subject to public consultation as an integral part of the proposed housing, since the AA concludes that one cannot be delivered without the other.

2 List of Proposed Policy Changes and Additions

The following changes and additions are requested to make the Local Plan policies sound and legally compliant.

V2 Removal of Green Belt status at Lytchett Matravers and Wareham should be made conditional on delivery of the proposed SANGs there.

E3 (d) All development must comply fully with Birds and Habitats Directives.

E7 & E8 & E9 The test of adverse effect should be against the conservation objectives of a site, not its "integrity".

An **additional policy** may be needed to deal with the LSE on the Avon and Itchen SACs as identified in section 1.2 above. In any case, the LSEs need to be avoided or mitigated somehow.

H3. Change "The Council also expects all proposals for new housing development on allocated sites to " to "All proposals for new housing development on allocated sites shall".

H3 (c) Change " the adverse effects from the new homes " to " some of the adverse effects from the new homes".

This is necessary because SANGs do not necessarily address **all** adverse effects.

H4 The *requirement* to deliver a suitable SANG should be added to the policy as it is essential under HRA & AA.

H5 The *requirement* to deliver suitable SANGs should be added to the policy as they are essential under HRA & AA. The policy needs more detail to explain which of the four sites is

responsible for what SANG contribution and how the timing of SANG delivery shall be determined by development progress.

H6 The *requirement* to deliver suitable SANGs should be added to the policy as they are essential under HRA & AA and a supporting reason for removing Green Belt status. The policy needs more detail to explain which of the three sites is responsible for what SANG contribution and how the timing of SANG delivery shall be determined by development progress.

H8 This policy (or a separate one) needs to identify how LSE on European sites will be avoided or mitigated for these small sites as they fall outside the default threshold for SANG provision in the Dorset Heaths SPD. SANGs must relate more closely to the location of developments than European sites or they will be ineffective. Suitable SANGs must be in place before LSEs begin to occur. The Dorset Heaths SPD does not cover all of the issues.

H12 Change "On rural exception sites a small amount of market housing may be permitted, provided it is demonstrated as being necessary to enable the provision of significant additional affordable housing to meet local needs. At least 70% of the homes will be affordable homes, unless the applicant can demonstrate through a financial appraisal that it would not be viable to deliver the required number of affordable homes, and provided that the scheme would still predominantly be an affordable housing scheme, in accordance with the definition of a rural exception site. "

to

"On rural exception sites a small amount of market housing may be permitted, provided it is demonstrated as being necessary to enable the provision of significant additional affordable housing to meet local needs. At least 70% of the homes will be affordable homes in accordance with the definition of a rural exception site. "

because "predominantly" means more than 50% and a housing scheme with 51% market-housing is not an exception.

I5 This policy is unsound and would result in avoidable LSE on Dorset Heaths for the following reasons:

1. The site is abuts the Heath near Morden Bog, which is an important environmental feature in itself and already a popular area to visit.
2. Tourist development here would inevitably bring more people onto the heath, as that is the main natural local attraction.
3. The site adds nothing to local housing needs but imports people in a very sensitive location.
4. Any SANG would be small in comparison with the directly abutting heath and inherently less attractive than the heath itself.
5. Horse riders and cyclists would not use the SANG (exclusively) because it is too small.
6. The SANG is not more closely associated with any planned residential development than

the heath itself, and most local people, who generally know Wareham Forest well, will choose the vastly larger heath over the SANG most of the time. SANGs are unlikely to work when they directly compete for visitors with immediately adjacent, wild heath.

7. The net result would be LSE on the Dorset Heath that is not sufficiently mitigated, and a false conclusion that the SANG has solved the mitigation problem of other housing developments in the North of Purbeck.

Chapter 7

Monitoring should include visitor numbers to the Dorset Heaths, not just to SANGs, otherwise there is no way of knowing if mitigation is being successful in keeping "urban pressures" on the heath constant as the population and visitor numbers grow (which is the aim of the Dorset Heaths SPD). This monitoring requires a credible level of resource.

The **Infrastructure Delivery Plan** must ensure that strategic SANGs are in place before the development they are mitigating is completed. Currently, these SANGs are shown as "Essential" but there is no delivery timetable for them. Their delivery should be linked to progress on associated developments.

Comment

Agent	Dr Mary Sparks (1186855)
Email Address	[REDACTED]
Company / Organisation	Langton Matravers Parish Council
Address	1a High Street Langton Matravers Swanage Bh193EU
Consultee	Dr Mary Sparks (1187733)
Email Address	[REDACTED]
Company / Organisation	Langton Matravers Parish Council
Address	1a High Street Langton Matravers Swanage Bh193EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Langton Matravers Parish Council (Dr Mary Sparks - 1187733)
Comment ID	PLPP3
Response Date	09/11/18 12:29
Consultation Point	Support sustainable community growth to provide for the needs of local residents (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	9
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 4, Housing

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

At its meeting on 8th November 2018 Langton Matravers Parish Council resolved to

'Record its concern that PDC have not followed due process in preparation of the plan for final consultation, in that although key policies were in place, several significant evidence documents giving supporting detail which enabled proper understanding of the impact of these policies were not made available to the public until the actual start of the consultation.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Mary Sparks (1187733)
Email Address	<div style="background-color: black; width: 100%; height: 1em;"></div>
Company / Organisation	Langton Matravers Parish Council
Address	1a High Street Langton Matravers Swanage Bh193EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Langton Matravers Parish Council (Dr Mary Sparks - 1187733)
Comment ID	PLPP636
Response Date	03/12/18 10:46
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Letter
Version	0.3
Files	H14-langton-matravers-parish-council-PLPP636.pdf

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H14

Do you consider that the Local Plan is sound? No



For Office Use Only

Requester ID: 015
 Consultee ID: 1187733
 Comment ID's: PLPP636

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	H14
Policies map	
Paragraph number	

Second Home Policy.

2. Do you consider that the Local Plan is:

- Legally compliant Yes No
- Sound Yes No
- Complies with the duty to co-operate. Yes No

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

(Please continue on a separate sheet if necessary)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:

Date:

The Purbeck Local Plan:

I am responding to the Second Home Policy (H14) of the Plan.

- I/It is considered that the Purbeck Local Plan is unsound in terms of its Second Home Policy (H14). To support sustainable development in this area it is required that this policy be strengthened to a Full Time Principal Residency Policy. To be consistent with St Ives (H2) policy and other areas.
- The existing draft H14 second home policy does not fulfil the requirements of the community of Purbeck, in that it continues to allow that new builds be used as holiday lets. The 2017 (Steve Tapscott) provides evidence to support a Principal residency policy. However the 2018 Second Home Evidence document, whilst providing evidence from St Ives and other areas does not support a full time principal residency policy, and instead focuses on a second home policy.
- The Purbeck second home policy lacks clarity and is not designed to sustain the communities of Purbeck. The term second home can be defined in different ways. Throughout the public consultation it was made clear that second homes include holiday lets and it is both types of second home that have reached a 'tipping point' and that a full time residency policy such as St Ives is required to balance the loss of existing market housing to this holiday market.
- A strengthened policy such as St Ives policy (H2) should be made Purbeck wide so as not to have an unintended impact on other areas of Purbeck. i.e. That all new builds should be used as HOMES for full time principal residency.

Previous Purbeck Plan consultations, media handouts and the Purbeck Local Plan highlight the requirements of the NEED for new HOMES. However the Purbeck plan, whilst citing evidence from eg St Ives and other areas, has chosen not to include a strong policy to ensure that all new builds be for full time principal residence i.e. HOMES.

The premise and focus of the Purbeck Plan and its consultation has been to provide HOMES. It has consistently maintained that it is about 'planning for the right HOMES in the right places'. The plan is therefore inconsistent with government policy. (<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>).

The evidence used for the Plan realises and attempts to address the problem of the second home/holiday let market, and highlights that there is a problem however then does not provide a strong policy, that would protect the ongoing sustainability of this area.

The premise of all the documentation sent out by Purbeck District Council, to the community of Purbeck is that the reason that housing is needed is to provide HOMES for people. If this is the case then the right type of HOMES should be built in Purbeck to address the issue of lack of HOMES. HOMES are needed that are affordable for people working locally. As with London, there is a huge difference in incomes and house prices. A strong policy is required that does not allow further new build HOMES to be used as holiday homes/holiday lets. This area is highlighted as a destination for its beauty, AONB, exceptional environmental diversity. It is important that the AONB is valued and protected, and therefore it is important that every build makes good use of land and is for a genuine needed sustainable purpose.

Purbeck has an opportunity to include a St Ives (H2) type policy that supports HOMES for people. People in this area struggle, even those on reasonable incomes to buy market housing. The second home/holiday

let impacts on working people's ability to afford housing. If a H2 full time residency policy was applied to all new builds there would be more opportunity for people to make Purbeck their HOME rather than the housing be lost to the second home/holiday let market.

Purbeck is similar to St Ives and other areas along the South West in that we have a very high % of existing second homes and holiday lets. So much so, that it has been allocated government Community led affordable Housing funds to counter the problem.

The Purbeck Local Plan second home evidence paper supports that second homes/holiday lets provide economic benefit. Whilst it cannot be argued that they do have economic benefit, however where is the evidence that second homes and holiday lets are more beneficial, in terms of economic, social, environmental, than full time residency. Whilst there may be some economic benefit from second homes and holiday lets, a substantial amount is lost to the community and does not necessarily support the local economy more than someone living in a HOME as a full time principal residence? It can be argued that this evidence is not available and so it cannot be claimed to be a reason to continue to allow new builds to be for second home/holiday lets.

In addition to evidence provided in the Second Homes evidence paper 2018, further evidence to strengthen the H14 policy to a full time principal residency policy:

- **The High Court judgement in the case of St Ives offers support for the H2 Full time principal residency policy.** <https://cornerstonebarristers.com/cmsAdmin/uploads/final-rlt-v-cornwall.pdf> ...'excessive levels of second homes and holiday lets can be harmful to the social fabric of the community which will continue unabated if no such restriction is imposed to prevent the use and occupation of new homes by the second home and holiday let market and that therefore is contrary to sustainable development.' Case No: CO/2241/2016 IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION PLANNING COURT IN BRISTOL: Bristol Civil Justice Centre 2 Redcliff Street Bristol Date: 10/11/16
- **The St Ives Neighbourhood Plan also offers support that a Full time principal residency policy is vital for the ongoing sustainability of that area. Comparatively Purbeck also has a similar % of second homes/holiday lets and requires a similar policy.**
The St Ives NP offers support offers further support for a full time principal residency policy. 101. However: i) Having a coherent planning system is a matter of national public interest. The overarching national planning policy is the achievement of sustainable development (paragraph 6 of the NPPF), i.e. it is in the national interest that development is sustainable. The NPPF defines "sustainable development" as comprising three dimensions: economic, social and environmental. As for the economic role, paragraph 7 of the NPPF provides that it includes: "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements...". Where a development makes such a contribution, it thus contributes to "the economic well-being of the country". The justification for Policy H2, as set out in the supporting text of the policy (see paragraph 26 above), is as follows: "... to meet the housing needs of local people, bring greater balance and mixture to the local housing market and create new opportunities for people to live and work here, to strengthen our community and the local economy...". [St Ives Area Neighbourhood Development Plan](#)

- Cllr Rita Lait (chairman of St Ives Neighbourhood Plan.) Additional evidence and clarification for H2 full time residency policy has been provided by Cllr Rita Lait. She has clarified that the reason that their policy is titled 'a full time principal residency policy' is to make it clear that all new builds be intended for that purpose only.

- The examiner of the St Ives plan offers support for the full time principal residency policy:

... On the basis of that justification, the Examiner expressly found that **"the restriction of further second homes does in fact contribute to delivering sustainable development"**, a conclusion which the Claimant does not seek to challenge – nor could it. In making that "economic" contribution to Judgment Approved by the court for handing down *R (RLT Environment Ltd) v Cornwall Council* sustainable development, Policy H2 thus promotes the interests of "the economic well-being of the country".

The Inspector notes that *'as second and holiday homes are not a category of NEED for which the NPPF advises that provision should be made, the policy (H2) involves no specific conflict with national policy.'*

- Note: In the context of St Ives and the South West the definition of second homes includes private second homes and holiday lets. Whereas The Purbeck Local Plan second homes evidence paper differentiates between second homes and holiday lets, rather than focussing on a full time principal residency policy. The evidence of St Ives has been used in the paper, however Purbeck has chosen not to use a full residency policy. This is not consistent with the evidence provided by other areas that are impacted in a similar way to Purbeck in terms of housing being used as holiday/second home/holiday lets. The outcome of the weakened policy is that it is not protecting future housing to be used as HOMES.
- Evidence in the form of local knowledge has been provided by residents and Parish Councils and NGO groups that whilst it is recognised that second homes/holiday lets are to some extent of economic benefit to this area in terms of tourism, that a tipping point has been reached. The continued increase of Second home/holiday market are influencing house prices and negatively impacting on the ability of key workers and other working people to be able to buy a home in this area. This is consistent with other areas along the South West and in other 'honey pot' areas.
- Purbeck is similar to St Ives and other areas along the South West in that there is a high % of existing second homes and holiday lets. This has been recognised by the allocation of government Community led affordable Housing funds to counter the problem.
<https://news.dorsetforyou.gov.uk/2017/08/25/purbeck-village-community-groups-receive-funding-to-kick-start-housing-projects/>

Earlier in 2017, the Council received a grant from the Government of £910,456 from the **Community Housing Fund** to help address the effects of second homes in the district by kick-starting affordable housing projects.

- A St Ives (H2) policy was discussed by Parish Councillors, PDC councillors, officers, members of the public at a Purbeck (affordable) Housing Forum meeting. It was actioned that PDC communicate with St Ives/Cornwall to explore a similar (H2) policy for Purbeck. There was support from residents, Councillors and some officers for such a policy.

- A response to the above meetings was that a second home policy written by Steve Tapscott – senior planning officer, in 2017 provided evidence to support a full time principal residence policy. Unfortunately the second home evidence paper (2018) does not go as far and is therefore weaker and therefore does not support sustainable development. Page 67 of 71 Recommendations for the Local Plan Review: 254. This report recommends that the local plan review incorporates proposed Policy PRH: Principal Residence Housing and that it be monitored over time.
- In response to an earlier consultation, PDC paused to gather further information from the community. The 2017 second home evidence paper (Steve Tapscott) provided evidence and support for a Principal Residency Housing Policy. (This paper appears to have subsequently withdrawn from the current supportive PLP evidence documents previously included on the Dorset For You website. Paper copies are available and PDC may have a link to the document. However there are supportive comments in the link to the document below, from the public that offer evidence from a range of sources that supports a full time principal residence policy.
<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/consultations/options/partial-review-options-consultation-report.pdf> pages 22 – 24 Purbeck Plan Partial Review January 2017.
- As mentioned above the more recent 2018 second home evidence document, whilst including much of the same text evidence as the 2017 it did not come to the same conclusion and did not suggest a PRH policy. It focusses on a partial second home policy, whilst giving many reasons to support a PRH policy. The document in some ways seems at odds with its own findings and evidence base.
- The supportive evidence documents and the final copy of the Purbeck Local Plan were not available until the 22nd October, however the public were invited to input at a prior policy group meeting and following full council meeting, where these documents were not available. This to some extent limited full public participation, as they did not have these documents available to them at the policy group or full council meeting. (ref: About Purbeck Issue 39 – November 2018).
- Lack of evidence in the second home evidence paper that supports that second homes and holiday lets compared with full time residency are more or less sustainable than full time residency. It is accepted that second homes and holiday lets do have some economic benefit, however is there any evidence to prove that they have more benefit overall than full time residents? This is where St Ives and others have 'realised' and argued that full time residents have an overall benefit when considering all aspects of 'Sustainable Development' (NPPF) ie. Benefits from living as full time residents should be considered not only the economic factors but also the social and environmental factors, which I believe that the NPPF considers should be taken into account. It is a high priority that our communities continue to exist into the future, and local knowledge supports that many of the existing market houses are being sold to the second home/holiday let market. To allow this to continue should be questioned as to whether it does in fact meet sustainable development. The benefit of having a healthy full time resident community should be seriously be taken into account particularly when considering schools, churches, village halls, volunteers including coastguards, lifeboat, police support, local clubs, neighbourly support for the elderly, allotments, all the year round support for local shops, pubs, pub teams etc.

- The ongoing increase of housing being lost in the centre of villages is meaning that to sustain communities housing is required to be built further away from the centres of villages/towns, to continue to do this is unsustainable.

Conclusion:

To meet the aspirations of a Purbeck Plan that supports and sustains the communities of Purbeck into the future and is consistent with sustainable development (NPPF – Brundtland definition) to be sound the second home H14 policy requires strengthening, to ensure that new builds are used as HOMES.

To make a difference and to be effective and genuinely sustainable the H14 second home policy needs to be strengthened to be consistent with Policy H2 St Ives Policy. The background evidence that has been researched in the case of St Ives and other evidence to support strengthening this policy is available. I have included references in this response, however this is not exhaustive. There is supportive evidence provided by Cornwall other areas in the South West etc that also offer support for a stronger policy. The situation in Purbeck is similar to many other areas along the South West. As was determined by the High Court Judge, to do nothing could lead to unsustainable development, which would be contrary to the Governments aims of Sustainable development.

References: to evidence documents that argue in support of strengthening the (H14) policy. To: support a sound policy in terms of ensuring that Purbeck is sustainable/viable/vibrant/strong community into the future. The evidence highlights the reasoning for (H14) being unsound in the context of meeting the governments aims of Sustainable Development in Purbeck.

- St Ives High Court Case: <https://cornerstonebarristers.com/cmsAdmin/uploads/final-rlt-v-cornwall.pdf>
- St Ives Neighbourhood Plan [St Ives Area Neighbourhood Development Plan](#)
- Examiner/Inspector report in response to St Ives:
- Cllr Rita Lait:
- St Ives Council:
- Cornwall Council:
- Study by Exeter University:
- Evidence provided within the councils own second homes evidence papers 2017/2018
- Responses throughout the 'long' and paused Purbeck Plan consultation: from residents, Parish Councils, groups such as The Purbeck Society, Pan Purbeck Action Campaign, CPRE- Purbeck and Poole branch.
- Government Community Housing Fund – specific to the geographical area of Purbeck: Funds made available specifically because of the high % of second homes (and holiday let) in the area.

Comment

Consultee	Mr Colin Leach (1191237)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Colin Leach (1191237)
Comment ID	PLPP468
Response Date	03/12/18 16:49
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy H14

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Please note I have ticked the boxes above to ensure my comment was included - would have preferred a "Not sure" option!

I was born and brought up in Bournemouth - I now live in Texas - I visit Dorset quite often (last time was 4 weeks ago) - I am very aware of the affordable housing issue for local residents and the distortion that occurs because of 2nd home ownership.

Here we have different property taxes - they are higher than the Dorset Council tax, but come with significant "exemptions" for "homesteaders", i.e. someone who is a Principal Owner/Occupier.

Here in Texas we have much higher property taxes (council tax). This amounts to about 2.5% of the CURRENT appraised value of the house per year. For example, if a house is appraised at \$500,000 then the taxes for a year would be \$12,500 per year. We have 2 "exemptions". 1st, we have a 20% "homestead exemption" and if the property is your principal residence, then the exemption on this case would be \$100,000 and the total taxes would be \$10,000 per year. 2nd we have an over 65 exemption of \$200,000 and in this case a retiree living in the property would have an appraised value of \$500,000 - \$100,000 (20%) - \$200,000 (over 65) = \$200,000 and pay only \$5,000 per year. The property appraisal also includes 2 components = (a) land and (b) house improvement. You can own some very valuable land with a shack on it alternatively you can own a miniscule plot with a very expensive house on it there are generous allowances for land used for agriculture (some people RENT cows to get these benefits!).

Applying some of this different approach to local housing tax might help the problem.

At the least, those who can afford a 2nd home would be subsidizing local services for those local residents. If the right level of taxes were applied (with exemptions) it may help to restore some balance.

Thank you

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Lawrence Legg (1190836)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Lawrence Legg (1190836)
Comment ID	PLPP269
Response Date	02/12/18 21:20
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	8
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H5:Wool, 127 _133 Housing
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I believe that the local plan has missed a huge swathe of people who can not attend meetings or have access to a computer to give their views.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Traffic safety in East Burton. As it is proposed to build 30 houses in a corner of a field just off the main Wool-Dorchester road with a further 30 houses also proposed in a field at the end of Sandhills Crescent, East Burton. I am very concerned about the access and egress of the site in Sandhills Crescent. Already due to a lack of parking there are more residents parking on the roads in general. The Sandhills Crescent development would only add to these problems. The village hall is used more and we note when events are held the Crescent and surrounding roads become congested. The extra traffic can only make things worse. When the rail barriers at the station are down East Burton is used as a cut through to get to the main roundabout and Winfrith sites. This is noted particularly in the mornings and evenings and can be inconsiderate and positively dangerous. Surely before it is even considered building extra houses the pavements or lack of them should be considered. Currently residents cannot walk safely in an area where none exist. To push a child in a pushchair or use a walker or any other mobility device is frightening. What little pavement there is cannot be used safely as it is uneven, narrow and on a slant. People who need to take their time find it easier to walk on the road. People with pushchairs cannot use the path by the bridge crossing as it is too narrow, uneven and overgrown with nettles in the summer consequently they still have to walk in the road. Perhaps we should look at these current problems before we add to the problem which the additional dwellings and cars would surely cause.

I recognise that housing is a problem for everyone but do we know how many houses are genuinely needed for this area? Also you say that some will be affordable housing for young people to buy. I have 2 daughters who have moved away from the area only because they cannot buy or even rent at the prices of the new builds already built. Please can someone tell me what is AFFORDABLE on the average wages of the area.

It is also noted that at present the Wellbridge Surgery is working hard to look after current patients. Any new houses would also surely break the current infrastructure of schools and currently there are no large employers in the vicinity which surely mean even more traffic through Wool.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Current residents are surely entitled to be heard.

Comment

Consultee	Edward Alun Lewis (1192353)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Edward Alun Lewis (1192353)
Comment ID	PLPP616
Response Date	03/12/18 10:56

Files	H2-EALewis-PLPP616.pdf
--------------	--



For Office Use Only
Requester ID: 24
Consultee ID: 1192353
Comment ID's: PLPP616; 617, 618,

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	H2
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- Legally compliant Yes No
- Sound Yes No
- Complies with the duty to co-operate. Yes No

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

POLICY H2 - The Housing Land Supply.

The chart contained in the plan states that 933 homes will be provided through Small Sites next to existing settlements and windfall.

The Strategic Housing Land Availability Assessment (SHLAA) states that "suitable" sites will only provide 446 homes. Within that figure of 446 homes some sites are within AONB or in villages without the infrastructure to support the volume of houses proposed. (eg. West Hulworth).

The Plan is therefore not sound in terms of not being able to reach its stated housing volume increase.

(Please continue on a separate sheet if necessary)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

To make the local Plan Sound there is a need to revisit larger potential sites in larger settlements to identify opportunities to develop where infrastructure allows.

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

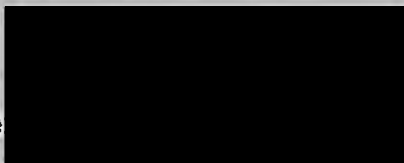
No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature



Date:

29/11/18.

Comment

Consultee Edward Alun Lewis (1192353)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Edward Alun Lewis (1192353)
Comment ID PLPP617
Response Date 03/12/18 10:56
Consultation Point Policy H8: Small sites next to existing settlements
[\(View\)](#)
Status Processed
Submission Type Letter
Version 0.4
Files [H8-EALewis-PLPP617.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

The submission of Local Plan to the Secretary of State for Public Examination
 The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)
 The adoption of the Purbeck Local Plan

Which policy / paragraph number / policies map does your comment relate to? H8

Do you consider that the Local Plan is sound? No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No



For Office Use Only
Requester ID: 24
Consultee ID: 1192353
Comment ID's: PLPP617

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	H8
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- Legally compliant Yes No
- Sound Yes No
- Complies with the duty to co-operate. Yes No

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Policy H8 - provisor b).

This provisor states:

b) " individually and cumulatively the size, appearance and layout of proposed homes must not harm the character and value of any landscape or settlements potentially affected by the proposals."

In terms of the above it is noted that a number of sites judged suitable in the SHHAA in West hulworth fall within the current West hulworth Conservation Area which was updated as late as 2015. The sites concerned are: Adjacent to Love House (9 units), Allotment Gardens (17 units) and 1 Church Road (9 units). Elsewhere in the Plan sites have been judged unsuitable for this reason. There is no doubt that these sites when developed would have an adverse effect on the special character of the village. Thus these sites should have been classified as unsuitable in line with b) above and also on the basis of AONB. It is noted that no "constraints" are listed in the SHHAA which indicates it has not been completed in line with the Councils own policy (H8) and SHHAA methodology. The Plan is therefore not sound on the basis that it does not follow stated Policy.

(Please continue on a separate sheet if necessary)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

As stated in section 3 the formulation of the Plan in terms of the Small Sites next to existing settlements has not followed the councils own policy (H8) and SHLAS methodology.

In the first instance the sites quoted in West hulworth that fall within the recently amended West hulworth Conservation Area should be re-assessed and removed from further consideration.

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

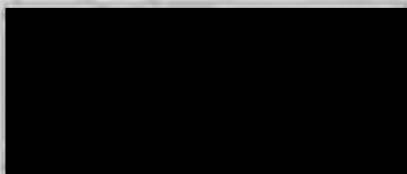
No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:



Date: 29/11/18.

Comment

Consultee Edward Alun Lewis (1192353)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Edward Alun Lewis (1192353)
Comment ID PLPP618
Response Date 03/12/18 10:56
Consultation Point Chapter 4: Housing ([View](#))
Status Processed
Submission Type Letter
Version 0.6
Files [Housing-EALewis-PLPP618.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

The submission of Local Plan to the Secretary of State for Public Examination
 The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)
 The adoption of the Purbeck Local Plan

Which policy / paragraph number / policies map does your comment relate to? Housing Paragraph 145

Do you consider that the Local Plan is sound? No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Chapter 4 - Housing.

Paragraph 145 of the above states:

"Housing growth should be directed to settlements that have good access to services and facilities consistent with wider aims of sustainability within the rural context of the District.

It is important that there is a balance in meeting the needs of the community and local economy, whilst recognising the need for small scale developments in rural areas to support rural communities and appropriate services."

By including West Hulworth as a location for what could be a massive increase in houses (30% approx) there has been no consideration given to the local infrastructure and services.

For example the inclusion of "suitable" development sites up Bindon Rd and at the top of Sunnyside do not consider that access to these sites is via a single dirt track private road maintained primarily by the residents. Services do not include gas and SSE have difficulty maintaining an electricity supply that is not vulnerable to trip-out.

In terms of "needs of the community" the Allotment Gardens provide a valuable amenity to the residents of Bindon Road and the wider village. Homes also utilise their "own road" for the parking of their vehicles though these need to be moved to allow access to refuse and delivery vehicles.

The Plan is not sound in terms of considering the needs of the

(Please continue on a separate sheet if necessary)

community and the available infrastructure so does not meet the council's own criteria.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

As mentioned in Section 3 the Plan is unsound because the inclusion in the plan of the sites discussed has not taken account of the councils own criteria for selection. They should therefore be removed from consideration. ~~which~~
~~to~~

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

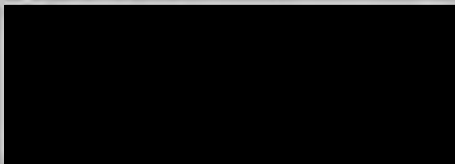
No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:



Date:

29/11/18.

Comment

Consultee Edward Alun Lewis (1192353)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Edward Alun Lewis (1192353)
Comment ID PLPP619
Response Date 03/12/18 10:56
Consultation Point Chapter 6: Infrastructure ([View](#))
Status Processed
Submission Type Letter
Version 0.4
Files [infrastructure-EALewis-PLPP619.pdf](#)

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

The submission of Local Plan to the Secretary of State for Public Examination
 The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)
 The adoption of the Purbeck Local Plan

Which policy / paragraph number / policies map does your comment relate to? Infrastructure Paragraph 243

Do you consider that the Local Plan is sound? No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No



For Office Use Only
Requester ID: 24
Consultee ID: 1192353
Comment ID's: PLPP619

PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	
Policies map	
Paragraph number	Chapter 6 - Infrastructure Para 243

2. Do you consider that the Local Plan is:

- Legally compliant Yes No
- Sound Yes No
- Complies with the duty to co-operate. Yes No

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Chapter 6 - Infrastructure

Para 243 states "The impact of increasing traffic volumes associated with new homes and rise in home delivery services are important factors that the Council has taken into consideration through preparation of the Purbeck Local Plan."

In the case of West hulworth this is patently untrue. The village is a popular tourist destination with exceptionally narrow streets, ~~has~~ an attractive feature (AONB) that determines the nature of the village. As a result of tourism the access through the village to hulworth Cove can be literally grid-locked for 3-4 months of the year. The idea that 107 homes (30% increase) can be added with potentially an extra 200 cars requiring access is ludicrous. The result would be catastrophic for residents and holiday makers alike. A classic example of this is the junction of Church Rd, Bindon Rd and the main road which is often grid-locked during the holiday season. The "suitable" sites identified in the SHMA (the basis for small-site totals) alone in this location could add a further 70 vehicles using the junction on a daily basis.

Access to sites along single track dirt roads up Bindon Rd and Sunny side is totally unachievable.

(Please continue on a separate sheet if necessary)

The Planning Process has not been followed in line with

the need to assess the impact of traffic volumes and the Plan is therefore not sound.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

The Local Plan is not sound on the basis that in the case of West Hulworth no account whatsoever has been taken of the effect of increased traffic volume.

As a result a number of sites should be removed where it is obvious that the effect of increased traffic volume has either not been assessed or not thoroughly assessed.

The SHLAA needs to be amended to reduce the sites in West Hulworth and the overall Plan Figures adjusted downwards or alternatives found in other locations in Purbeck in line with the need to "spread development across the District".

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:



Date:

29/11/18.

Comment

Consultee	Mrs Jane Lewis (1190905)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Jane Lewis (1190905)
Comment ID	PLPP243
Response Date	02/12/18 14:32
Consultation Point	Conserve and enhance Purbeck's natural habitat, biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	80
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I'm not sure at all how so much development can be assured to conserve and enhance Purbeck's wildlife and biodiversity with the rather large scale development on so many sites that currently already conserve and enhance our biodiversity.

I'm cynical that a SANG can ever make up for loss of habitat of some of our already struggling wildlife.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

I want to see all new development assessed openly - what will be lost (including some sort of survey by an objective, expert organisation) and how exactly the loss will be mitigated - in real terms, perhaps with examples from elsewhere.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Jane Lewis (1190905)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Jane Lewis (1190905)
Comment ID	PLPP244
Response Date	02/12/18 14:48
Consultation Point	Policy I2: Improving accessibility and transport (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 244

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

There is no mention of preserving the current status of the railway crossing at Wareham station, as it is suitable for all pedestrians, including wheelchairs, motability scooters, pushchairs etc. The formerly raised plans for a very unattractive and unsuitable footbridge must be forever shelved. The current

situation works. We don't have to spend vast amounts of money coming up with something that will split Wareham in half, add to isolation in North Wareham, and inevitably create more traffic.

In addition, in paragraph 244, it is mentioned that the additional housing's impact on road usage will not be 'severe' with mitigation - I'd very much like to know (a) how this conclusion was reached - what does severe actually mean when roads (specifically the A351) are already highly congested at many times of the day (and naturally even worse in holiday periods) and (b) what is the intended mitigation and how will it help?

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

a) include keeping the pedestrian crossing at Wareham station in the plan.

b) provide more clarity as to the impact of so many additional homes across the area on our roads and how the mitigation will help.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Jane Lewis (1190905)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Jane Lewis (1190905)
Comment ID	PLPP245
Response Date	02/12/18 14:55
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H8

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I don't consider that the numbers of homes needed for our area is accurate and based on our needs. I'm not convinced that the actual homes we'll get built are going to meet the needs we do have in Purbeck - ie, for homes that are affordable for local people to buy as well as for renting. It is in my view vital to provide housing for young people, couples and families to purchase at a rate that is viable.

We don't want more housing available to be bought by private landlords or for holiday lets/second homes.

We want attractive developments with good quality houses, that are eco and wildlife friendly - homes that reflect our rural nature and heritage.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Select developers with eco credentials and commitment.

Be creative in planning, not just accepting urban sprawl.

Have a real commitment to providing homes that we need.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mrs Samantha Lewis (1191260)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Samantha Lewis (1191260)
Comment ID	PLPP536
Response Date	03/12/18 19:54
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy H6

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

This Plan is unsustainable and will create social problems within Lytchett Matravers unless there is huge investment in infrastructure and amenities.

The plan for 150 extra houses without any supporting infrastructure does not deal with the extra c.590 houses already in the |Plan nor the 84 houses that have been built/are being built in the village since 2012.

The plan does not provide adequate schooling and medical facilities, and also does not address increased traffic levels - given that there are no additional jobs people will have to travel to work. The village has a minimum public transport system - which does not currently offer any villagers an option to get to Poole at 9.00am. There are no alternative travel options beyond using cars.

The additional housing since 2012 has meant that the exits onto the A35 and A350 at peak hours is already difficult. The Plan does not acknowledge these problems nor choose sites with better public transport options over the ones in Lytchett Matravers. The traffic impact has not been considered in light of the public transport provisions in the area and this is a serious lack of consideration of an important aspect of housing need and provision.

The housing options for this village are unsustainable and will increase a reliance on car travel making traffic problems for the entire local area. These sites are unsuitable for that reason.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Remove these sites from the Plan - they do not offer sustainable transport options and increase a reliance on car travel across the District.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Currently many residents feel that they are not being informed when important decisions are being made.

Comment

Consultee	Mr John Loader (1184944)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr John Loader (1184944)
Comment ID	PLPP232
Response Date	02/12/18 13:57
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy E4 Assessing Flood Risk

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

It is good to see the Purbeck District Council (PDC) have taken into account in their Local Plan the huge amount of work carried out by the Environment Agency, with local resident's input, that produced the Jacobs Report-Lytchett Minster Flood Risk Study. This study concluded that "it is unfortunate that the village [Lytchett Minster] lies at a location that is at risk from more than one source of flooding and

which is particularly sensitive to a range of combined events where the consequences of different sources of flooding overlap." It is therefore very hard to see how any developer could overcome the topography and geology that contribute to Lytchett Minster's flood issues. It is also widely recognised that water flows during peak periods of rainfall are effectively managed by the 'sponge' effect that the green belt land of grassland pasture with mature trees and hedgerows, currently surrounding the village, has.

The Environment Agency and Dorset County Council are continuing with work to understand such threats and carrying out considerable modelling to fully understand how the rising sea levels associated with climate change will additionally contribute to these threats in the future. PDC appear to have taken this important work into account when deciding on inappropriate developer led proposed sites.

This particular element in the proposed local plan should be supported for its soundness.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	██████████
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP494
Response Date	03/12/18 17:33
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	Covering letter-report-vision plans wool-letter-report-vision-plans-revised.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Evidence Base/para 8-9
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is that the viability evidence base to the Purbeck Local Plan is currently not fully justified and therefore potentially not fully consistent with National Policy.

Whilst supportive of the overall approach to assessing viability adopted in the emerging Purbeck Local Plan (emerging PLP) our clients have some concerns that the current evidence base is not fully justified owing to inconsistencies and a lack of detail and transparency in the viability evidence base. As a result it is potentially not consistent with National Policy and the emerging PLP policies are not sufficiently effective. With some further clarifications and amendments (as set out below) it is considered likely that the emerging PLP can be found sound. We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

In terms of viability the key element of the emerging PLP evidence base is the '*Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy* Final Report (October 2018) by Dixon Searle Partnership (hereafter the 'DSP viability appraisal').

As an 'allocated residential site of over 200 units' it is stated that the Wool allocation (Policy H5) will be 'nil rated' for CIL, and that appropriate and proportionate developer contributions to infrastructure will be secured from Section 106 (s106) contributions. Infrastructure requirements are set out in both emerging PLP site specific and topic specific policies (including the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and, I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the PDC 'Infrastructure Delivery Plan' (October 2018) (IDP), with Appendix 4 setting out an IDP schedule specific to the site allocations, including Wool.

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table (please note this table also been attached owing to some apparent editing issues with the consultation portal) :

IDP Appendix 4:

Essential Infrastructure type

IDP Appendix 4:

Wool – 'developer contributions' and 'cost' columns

Costs appearing in DSP Viability Appraisal for Wool*

Heathland mitigation

S106 – cost N/A provided as part of the development

SANGS

£1,500 / unit @ 466 units = £699,000

Nitrogen neutrality

S106 – cost N/A provided as part of the development

Nitrogen

£300,000

Fields in trust play requirements

TBC

Play equipment

£100,000

Contribution to educational costs

TBC phased

S106 - £6161 per qualifying dwelling

Education

£6161/unit @331 units = £2,039,291

Travel plan for new residential development

S106 - £10,000 (with a ?)

Travel Plan - £10,000

Improvements to transport hub, e.g. additional secure cycle parking.

S106 - TBC

Transport

£200,000

Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.

S106 – TBC

Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)

S106 and DLEP- £5000 each plus installation

£500/unit @ 466 units = £233,000

No entry

No entry

GP surgery

£80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, 'Construction Costs' heading

Government guidance on viability is set out in the latest NPPF, with more detailed guidance set out in the updated PPG and associated Viability Guidance. NPPF (para 57) states that: '*Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available*'. As a Local

Plan scheduled for submission for Examination after 24 January 2019, the guidance set out in the latest NPPF and NPPG is applicable.

In essence there is now a greater focus on viability at the plan making stage (PPG, Para 002 – Ref ID 10-002-20180724) with the aim that viability assessment ‘*should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine the deliverability of the plan*’ (PPG, (Para 002 – Ref ID 10-002-20180724). In terms of affordable housing in particular, but also for other policy requirements, the PPG states these should be ‘*set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage*’ (PPG, Para 002 – Ref ID 10-002-20180724).

Other relevant guidance from the NPPG includes the need to consider the specific circumstances of strategic sites (PPG, Para 005 – Ref ID 10-002-20180724) and for any viability assessment to be ‘*supported by appropriate available evidence informed by engagement with developers, landowners and infrastructure and housing providers*’ (PPG, Para 010 Ref ID 10-002-20180724).

Whilst supportive of the overall approach to assessing viability adopted in the ‘DSP viability appraisal’, which itself is described as ‘*a high level review*’ (para 2.10.1 and 3.3.9) our client have some concerns. These relate to the assumptions used to determine costs, and include some apparent uncertainties and specific discrepancies (see below). Our clients also particularly note the conclusion that the 40% affordable housing target for Wool is ‘*challenging*’ under some scenarios (para 3.3.8 and 3.3.5). Our client’s high level analysis supports this conclusion, but identifies that between 30% - 40% affordable housing might be a more realistic expectation for this site, depending on the precise cost and section 106 assumptions used, and assuming a housing tenure mix based on 10% social rent, 20% affordable rent and 70% shared ownership.

In terms of uncertainties, our clients particularly note those acknowledged within the PDC viability appraisal including the following:

- 1 *‘with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations’* (para 3.3.6);
- 2 *the outcomes could vary considerably with timing, scheme details, further national policy developments and so on’* (para 3.3.8); and,
- 3 *changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcome from other development or any necessary land value flex – can have an impact on the overall results’* (para 3.3.10).

However, our clients also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as ‘essential’ by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table above/attached). There is also some inconsistency in wording between the site specific Policy H5 requirements and the wording used in the IDP, with a need for the Policy H5 requirements to more closely reflect the IDP wording, which sets more specific and focussed requirements (please refer to our clients’ H5 representations). Whilst our clients note that some largely appropriate figures have been adopted by DSP for S106 costs in their high level viability assessment (see summary table above/attached) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment, and in order to more fully meet the soundness test of ‘justified’. In particular, the assumptions behind the site specific costs attributed to Habitat Regulations mitigation (i.e. SANGS and Nitrogen Neutrality – see DSP viability appraisal para 2.9.7 and 2.9.8), transport and electric vehicle charging points (see DSP viability appraisal para 2.9.9 and Appendix I: Assumptions summary appendix I) need to be more fully understood.

In terms of the cost assumptions used, the Government guidance on costs is set out in the PPG at para: 012 Reference ID: 10-012 20180724 and states:

'As far as possible costs should be identified at the plan-making stage. Plan makers should identify where costs are unknown and identify where further viability assessment may support a planning application. Costs include:

- 1 *build costs based on appropriate data, for example that of the Building Cost Information Service.*
- 2 *abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value.*
- 3 *site-specific infrastructure costs, which might include access roads, sustainable drainage systems, green infrastructure, connection to utilities and decentralised energy. These costs should be taken into account when defining benchmark land value.*
- 4 *the total cost of all relevant policy requirements including contributions towards affordable housing and infrastructure, Community Infrastructure Levy charges, and any other relevant policies or standards. These costs should be taken into account when defining benchmark land value.*
- 5 *general finance costs including those incurred through loans*
- 6 *professional, project management, sales, marketing and legal costs incorporating organisational overheads associated with the site. Any professional site fees should also be taken into account when defining benchmark land value.*
- 7 *explicit reference to project contingency costs should be included in circumstances where scheme specific assessment is deemed necessary, with a justification for contingency relative to project risk and developers return*

Other guidance relates to establishing gross development value and land value (paras 010 and 011).

Although our clients have had some (limited) correspondence with DSP and Purbeck DC in the production of the DSP Viability Appraisal, we look forward to assisting PDC further in this regard. To assist this process our clients therefore provide as part of these representations the separate Savills Report 'Representations on the Viability Evidence Base' relating to some of the key matters to be considered and resolved.

Overall, given the current caveats/acknowledged limitations of the DSP viability appraisal, the apparent s106 uncertainties specified within the IDP Schedule, and the cost, s106, GDV and land value uncertainties raised in the attached Savills report, it is considered necessary and appropriate for the relevant policies relating to providing housing at Wool (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for deviation from the policy requirements.

In order for this element of the policy to be effective and also in order to comply with national policy, it is necessary for further confirmation and detail as to the key assumptions used in the DSP viability appraisal to be unequivocally and transparently set out. This is required so that in the event that it is necessary for an applicant to submit a further viability assessment at the planning application stage, a clear and accurate comparison between the key assumptions of the Local Plan viability assessment and any changes in circumstances that have arisen in the intervening period are easily identifiable, in accordance with PPG. It is also necessary to satisfy the PPG requirement for '*an iterative and collaborative process*'.

With the resolution of the issues outlined above the precise level of affordable housing that can be supported at Wool can be better understood, with the initial assessment confirming that this could lie within a range of 30% - 40% (depending on the precise cost and section 106 assumptions used, and assuming a tenure mix based on 10% social rent, 20% affordable rent and 70% shared ownership).

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The DSP viability assessment which forms a key part of the emerging PLP evidence base requires some further amendments and clarifications in order to more fully comply with National Policy as follows:

- 1 Provide further confirmation and detail as to the key assumptions used (including on those specific items raised in the attached report and in terms of the anticipated section 106 requirements), and for these to be unequivocally and transparently set out in the viability assessment and IDP, and for that detail to be subject to sufficient consultation with the relevant interested parties.
- 2 The apparent inconsistencies between the site specific policies and IDP need to be resolved.

Whilst it is already considered that the Wool allocation is deliverable, with the benefit of these clarifications it will be possible to better confirm the likely level of affordable housing that can be provided at Wool, with the initial assessment confirming that this could lie within a range of 30% - 40% (depending on the precise cost and section 106 assumptions used, and assuming a tenure mix based on 10% social rent, 20% affordable rent and 70% shared ownership).

It is also considered essential that the relevant policies relating to providing housing at Wool (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure) retain wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any (not just exceptional) justification for deviation from the policy requirements.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of the above matters in time for the Examination.

If you have any supporting documents please upload them here. Covering letter-report-vision plans

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters.

3 December 2018
 WOOL R19 -COVERING LETTER-FINAL-03.12.18



Purbeck Local Plan Consultation
 Purbeck District Council Offices
 Worgret Road
 Wareham
 Dorset
 BH20 4PP

Andrew Fido

By email to: localplan@purbeck-dc.gov.uk

Wessex House
 Wimborne BH21 1PB
 T: +44 (0) 1202 856 800
 F: +44 (0) 1202 856 801
 savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered



that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham & Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' is further clarified to ensure that there are no references to infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



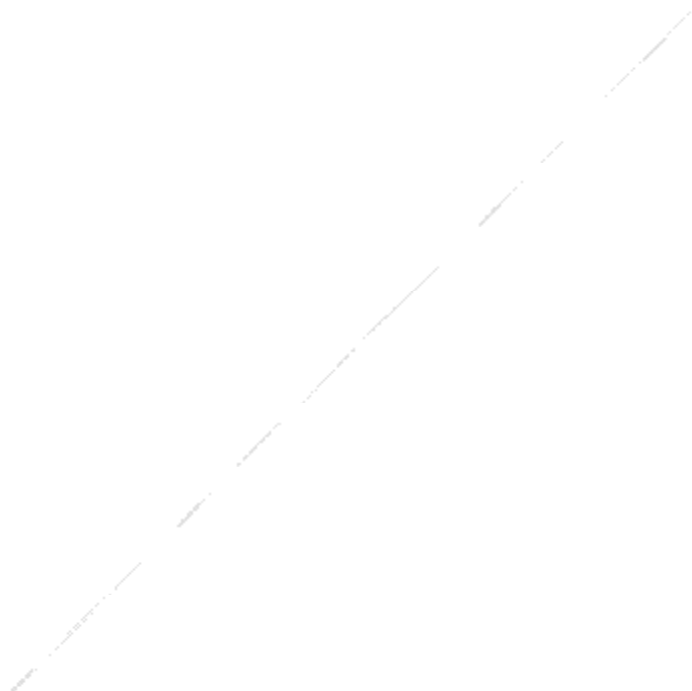
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Viability Assumptions

Introduction

Dixon Searle Partnership (DSP) were commissioned by Purbeck District Council ('the Council') to produce a Local Plan Viability Study (the DSP Viability Appraisal) to support the Purbeck Local Plan 2018 – 2034 Pre Submission Draft and Revised CIL. The consultation closes on 3rd December 2018.

The DSP Viability Appraisal is a desk based study based on information provided by the Council and a number of viability assumptions made by DSP. The viability assessments are based on a series of residual valuation scenarios that model the gross development value achievable from different uses, in different areas within the Borough, and discounts development costs, including the cost of policy compliance and section 106 contributions, interest costs and developer's profit. The residual sum that is left is then compared on a price per Ha basis with varying Benchmark Land Values (BLV's).

The subject site falls within the Purbeck sub market and as an allocated residential Site of over 200 units would be nil rated under the proposed levy. A map showing a visual representation of the proposed Charging Zones can be seen below:



Area Wide Map of the CIL Charging Zones

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that “*where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer*” (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision 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 Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 425429
 drawing no MP001
 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision Plan - 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title Wool Vision Plan - 650 homes
 project Wool Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

3 December 2018
WOOL R19 -COVERING LETTER-FINAL-03.12.18-revised



Purbeck Local Plan Consultation
Purbeck District Council Offices
Worgret Road
Wareham
Dorset
BH20 4PP

Andrew Fido



By email to: localplan@purbeck-dc.gov.uk

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered

that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham and Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' (the Regulation 123 list) is further clarified to ensure that there are appropriate references of infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations. The Regulation 123 list should therefore require that certain infrastructure projects relevant to the development of Wool (emerging PLP Policy H5) (and the other zero CIL rated sites) will be funded by Section 106 contributions.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



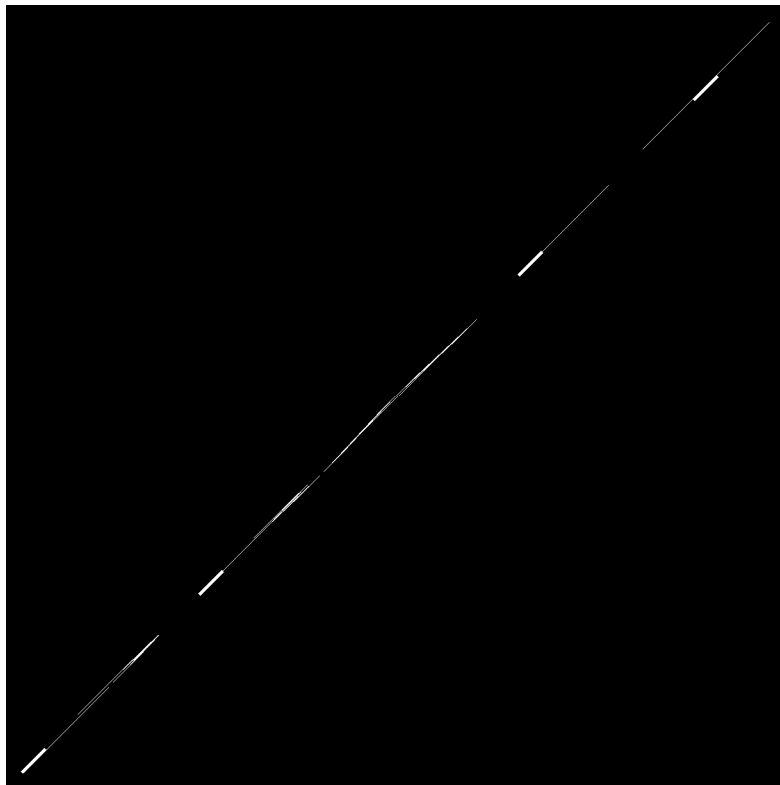
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, 'Construction Costs' heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that *“where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer”* (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – 'developer contributions' and 'cost' columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, 'Construction Costs' heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd.
Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.



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

title: Wool Vision Plan - 470 homes

project: Wool Masterplan revision: -

client: Weld Estate/Redwood Partnership date: 03 December 2018

job no: WIPL 425429 drawn by: SM

drawing no: MP001 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

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title: Wool Vision Plan - 650 homes

project: Wool Masterplan revision: -

client: Weld Estate/Redwood Partnership date: 03 December 2018

job no: WIPL 425429 drawn by: SM

drawing no: MP002 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

urban design studio

Southampton
Birmingham
Cambridge
London
Oxford

savills

savills.com/urbandesign

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	████████████████████
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP495
Response Date	03/12/18 17:36
Consultation Point	Policy E12: Design (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	letter-report-vision plans
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy E12 -supporting para 104
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is that the SPD documents referenced at para 104 and the wording of policy E12 are not sufficiently justified and not consistent with National Policy owing to their outdate nature.

Whilst our clients support the objectives of Policy E12 and recognise the importance of high quality design they consider that the reference at criterion (e) to avoiding and mitigating any harmful impacts is unduly onerous and would be better qualified in terms of 'significant' unacceptable impacts.

With respect to the supporting text at paragraph 104, our clients are concerned at the reference to the applicability of various supplementary planning documents alongside policy E12, including the District Design Guide 2014, the DCC residential car parking strategy 2012 and, in particular, the Wool Townscape Character SPD 2012. Our clients are concerned that the use of these documents which pre-date the NPPF is neither justified nor consistent with National Policy, and that the reference that they should be 'read alongside' policy E12 is ambiguous and gives insufficient clarity as to the degree of weight to be attached to their contents.

In particular our clients' concerns regarding the Wool Townscape Character SPD 2012 are :

- 1 it is over six years old and thus does not consider or reflect the context of the new housing allocations at Wool under policy H5 of the emerging PLP; and,
- 2 whilst providing a detailed description of the existing context of the settlement, the appraisal makes no recommendations for how future development should be designed or where it should be located;
- 3 it describes a 'strategic gap' at East Burton which is not accurately plotted nor reflects recent planning permissions granted in the area and related recommendations for retention are anomalous to the rest of the document which provides no design guidance.

Overall it provides no useful or robust guidance, is significantly out of date and it is not considered to be an appropriate material consideration to be referenced within the Pre-Submission Local Plan.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Our clients propose that para 104 is amended as follows:

*"When developing proposals for development, applicants should have regard to the criteria set out in the policy below alongside **other relevant material considerations such as up to date Supplementary Planning Documents.**" (proposed amendments underlined)*

Our clients propose that criterion (E) to policy E12 is amended as follows:

The Council will expect proposals for all development and other works to demonstrate a high quality of design that:

- 1 *avoids and mitigates any **significant** harmful impacts from overshadowing, overlooking, noise and any other **significant** adverse impacts including light pollution from artificial light on local amenity.*

These proposed changes will help to ensure that the Draft Plan meets the "justified" test of soundness.

If you have any supporting documents please upload them here.

letter-report-vision plans

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

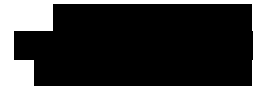
Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters.

3 December 2018
WOOL R19 -COVERING LETTER-FINAL-03.12.18



Purbeck Local Plan Consultation
Purbeck District Council Offices
Worgret Road
Wareham
Dorset
BH20 4PP

Andrew Fido



By email to: localplan@purbeck-dc.gov.uk

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered



that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham & Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' is further clarified to ensure that there are no references to infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



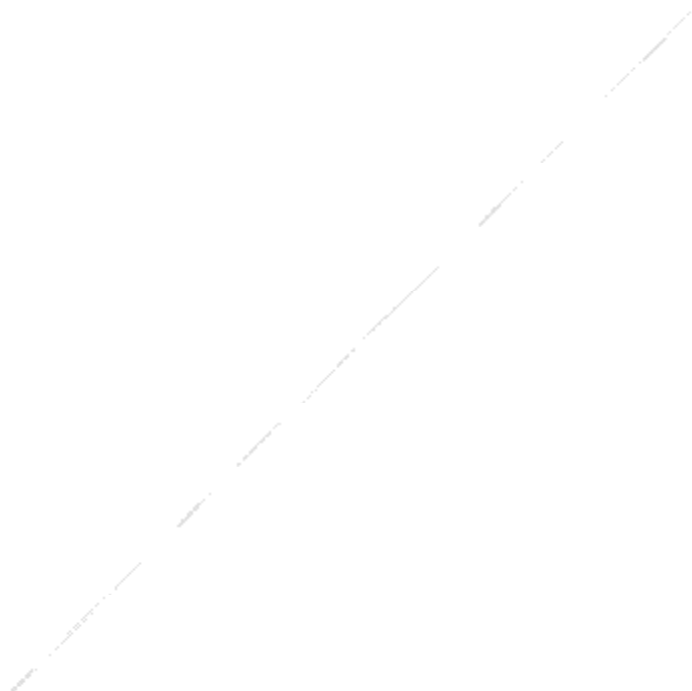
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Viability Assumptions

Introduction

Dixon Searle Partnership (DSP) were commissioned by Purbeck District Council ('the Council') to produce a Local Plan Viability Study (the DSP Viability Appraisal) to support the Purbeck Local Plan 2018 – 2034 Pre Submission Draft and Revised CIL. The consultation closes on 3rd December 2018.

The DSP Viability Appraisal is a desk based study based on information provided by the Council and a number of viability assumptions made by DSP. The viability assessments are based on a series of residual valuation scenarios that model the gross development value achievable from different uses, in different areas within the Borough, and discounts development costs, including the cost of policy compliance and section 106 contributions, interest costs and developer's profit. The residual sum that is left is then compared on a price per Ha basis with varying Benchmark Land Values (BLV's).

The subject site falls within the Purbeck sub market and as an allocated residential Site of over 200 units would be nil rated under the proposed levy. A map showing a visual representation of the proposed Charging Zones can be seen below:



Area Wide Map of the CIL Charging Zones

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that “*where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer*” (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision 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 Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 425429
 drawing no MP001
 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision Plan - 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title Wool Vision Plan - 650 homes
 project Wool Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	██████████
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP497
Response Date	03/12/18 17:40
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Letter-report-vision-plans
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H2 - Housing land supply
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is that some elements of Policy H2 – Housing land supply are potentially not sufficiently justified.

Our clients support the emerging Purbeck Local Plan (emerging PLP) in applying the indicative standard housing need figure (168 dpa) as the housing requirement for Purbeck, which was proposed by the Government in September 2017 as part of its “*Planning for the right homes in the right places consultation*” and subsequent more recent Government clarifications. With regard to the distribution of housing development across Purbeck, they strongly support a minimum of 470 homes at Wool as set out in Policy H2.

However Policy H2 places a potentially inappropriate over reliance on the delivery of 933 homes (over the plan period) through currently unidentified ‘small sites next to existing settlements’ (270 dpa) and ‘windfall within existing settlements’ (663 dpa). It is considered that a reduced homes target from these sources, and an increased housing target for the Wool allocation, could be more appropriate.

Our clients’ concern is that whilst some comfort may be drawn from the site specific work set out in the SHLAA and the housing background paper, it is uncertain as to how many candidate sites are deliverable – i.e. available now, offer a suitable location for development and are achievable with a realistic prospect that housing will be delivered on the site within 5 years and/or developable – i.e. in a suitable location for housing development with a reasonable prospect that they would be available and could be viably developed at the point envisaged.

Common factors constraining potential windfall and settlement edge sites include fractured ownerships and limited access to the public highway. A key shortcoming is that where such sites provide less than 10 units they will fail to provide affordable housing.

Conversely there is an acknowledged capacity at Wool for more housing, with PDC’s recent ‘Homes for Purbeck’ consultation referring specifically to sustainable options for both 650 and 800 homes at Wool (i.e. beyond the 470 unit allocation currently set out in policy H2 and H5), with the sustainability credentials also confirmed by the PDC Housing Background Paper as follows: *‘Each of the options consulted upon offered an opportunity to achieve sustainable development, was consistent with national policy and does not have significant impact that outweighs the benefits of development (guided by the EICS and SA)’*. One key component of Wool’s sustainability credentials is the employment opportunity at the nearby Dorset Innovation Park (strategic employment site and Enterprise Zone) which has the potential for generating more sustainable commuting patterns, which differentiates it from the Moreton Station/Redbridge Pit option.

To assist further consideration our clients enclose an indicative Wool vision plan which has been informed by the requirements of the emerging PLP Draft Policies and demonstrates how either 470 or 650 homes (plus a 65 bed care home and the other required elements, including large areas of public open space and the required sustainable drainage measures), can be delivered on the Site.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Consider reducing the target for the number of homes to be provided on small sites next to existing settlements and windfall, and increase the target for the number of homes to be provided at Wool from 470 to 650 homes.

If you have any supporting documents please upload them here.

Letter-report-vision-plans
Letter-report-vision-plans

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters.

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	██████████
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP498
Response Date	03/12/18 17:43
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	letter-report-vision plans (1)
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H3
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is that some elements of Policy H3: New Housing are potentially not sufficiently justified or effective.

Our clients are in broad support of policy H3 and the requirements it sets out for new housing development.

However some of the wording is insufficiently precise and therefore is not effective, leading to a risk of being unsound. Our clients believe this can be addressed through simple changes to the existing wording.

Policy criterion (g) requires details of charging points for electrical vehicles and the infrastructure needed for superfast broadband connectivity for the new homes.

Whilst these objectives are supported the policy wording would benefit from a clarification as to how many electric vehicle charging points are required and their preferred location, or at least set relevant criteria as to how this may be determined.

Our clients' representations to the emerging PLP viability evidence base are also relevant to this policy, as they have requested clarifications as to the assumptions used in the evidence base (the DSP viability appraisal) as to the likely costs for providing electric vehicle charging points in accordance with this policy.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Amend criterion g as follows:

- 1 ~~include details of~~ set out a strategy for the provision of both on-plot and publically available charging points for electrical vehicles across a proportion of the homes and the infrastructure needed to achieve superfast broadband connectivity for the new homes;

Provide clarifications as to the anticipated cost of the electric vehicle charging points.

If you have any supporting documents please upload them here. letter-report-vision plans (1)
letter-report-vision plans

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

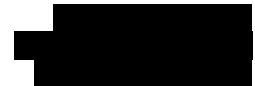
Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters

3 December 2018
WOOL R19 -COVERING LETTER-FINAL-03.12.18



Purbeck Local Plan Consultation
Purbeck District Council Offices
Worgret Road
Wareham
Dorset
BH20 4PP

Andrew Fido



By email to: localplan@purbeck-dc.gov.uk

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered



that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham & Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' is further clarified to ensure that there are no references to infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Viability Assumptions

Introduction

Dixon Searle Partnership (DSP) were commissioned by Purbeck District Council ('the Council') to produce a Local Plan Viability Study (the DSP Viability Appraisal) to support the Purbeck Local Plan 2018 – 2034 Pre Submission Draft and Revised CIL. The consultation closes on 3rd December 2018.

The DSP Viability Appraisal is a desk based study based on information provided by the Council and a number of viability assumptions made by DSP. The viability assessments are based on a series of residual valuation scenarios that model the gross development value achievable from different uses, in different areas within the Borough, and discounts development costs, including the cost of policy compliance and section 106 contributions, interest costs and developer's profit. The residual sum that is left is then compared on a price per Ha basis with varying Benchmark Land Values (BLV's).

The subject site falls within the Purbeck sub market and as an allocated residential Site of over 200 units would be nil rated under the proposed levy. A map showing a visual representation of the proposed Charging Zones can be seen below:



Area Wide Map of the CIL Charging Zones

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that “*where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer*” (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision 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 Masterplan revision | -

client | Weld Estate/Redwood Partnership date | 03 December 2018

job no | WPL 425429 drawn by | SM

drawing no | MP001 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

urban design studio

Southampton
Birmingham
Cambridge
London
Oxford

savills.com/urbandesign

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision Plan - 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title Wool Vision Plan - 650 homes
 project Wool Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	[REDACTED]
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP500
Response Date	03/12/18 17:50
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	wool-letter-report-vision-plans-revised.pdf letter-report-vision-plans (1)
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H5 Wool
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is that some limited elements of Policy H5: Wool are potentially not sufficiently justified or consistent with National Policy.

Our clients support the allocation of their land at Wool, and recognise and support the Local Plan evidence base which confirms this as an appropriate strategic housing allocation on account of it being:

- 1 A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- 2 Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).
- 3 Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients' control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

The Wool housing allocation therefore represents a unique opportunity for an inherently sustainable development.

However, our clients have concerns about some elements of the detailed wording of policy H5 which they believe can be addressed through simple changes to the existing wording.

In order to be considered more 'positively prepared' it is considered that the number of homes sought to be delivered at Wool should be expressed in the policy wording as a minimum of 470 rather than the current stated maximum (up to). The requisite changes should also be made to policy relating to the sub-component land parcels.

It is accepted that development at Wool will make proportionate contributions to infrastructure by Section 106 that meet the statutory tests set out in Regulation 22 of the CIL Regulations and in the NPPF at para 56 (namely that planning obligations are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development). Our clients also support the final paragraph of Policy H5 allowing the consideration of site specific factors that may affect viability at the application stage through the submission of a financial viability appraisal.

However, our clients remain concerned that a small number of the policy requirements are not adequately evidenced as reasonably related to the proposed development and are thus not consistent with National Policy. Our clients believe these can be addressed through simple changes to the existing policy wording.

There is also some apparent inconsistency between H5 and the Council's Infrastructure Development Plan (IDP) which confirms provision through 'financial contributions', whilst some of the H5 criterion requires actual physical delivery. For example criterion (b) could currently be interpreted as requiring the direct provision of infrastructure improvements at Wool Railway Station which would require land outside of our client's control. It is also noted that the IDP specifies differing and lesser requirements for Wool (see Appendix 4 Infrastructure Delivery Plan Schedule) than set out in Policy H5, and that

the final costs are not all specified. Our clients' representations to the PDC viability evidence have also identified that this has been based on largely generic cost and Section 106 assumptions and there is a need for greater transparency and consistency (see our separate representations). These discrepancies need to be corrected in order to make the policy more effective.

The policy requirement for a *'traffic statement or assessment of the likely impact on the safety risk at the level crossing and mitigation measures that satisfy Network Rail and the Highways Authority'* is not considered to be sufficiently evidenced. In fact the PDC Transport Background Paper January 2018 set out DCC's firm view that 1,000 homes at Wool would not result in a 'severe' (ref: NPPF) impact on queuing at the level crossing at Wool station and the updated October 2018 version reiterates these findings and adds at para 29 that: *"a key change since the modelling was carried out is the reduction in the number of new homes proposed in the Purbeck Local Plan at Wool from 1,000 to 470. It is therefore assumed safe to predict that the level of additional queuing would be halved."* We are also not aware of any safety issue having been raised by Network Rail to date, and none is referenced in the PDC evidence base.

The policy would also benefit from some slight rewording to clarify that community facilities are to be focussed on the larger parcels.

The attached Wool Vision Plan indicates a policy compliant development layout showing, in addition to the required housing:

- 1 the required community hub; care home; and buffers from the pipeline and SAM on the 'land to the west of Chalk Pit Lane and Oakdene Road';
- 2 informal and formal open space focussed on the land to the north east of Burton Cross Roundabout; and,
- 3 sustainable drainage measures, including detention basins across the Site as agreed with the Lead Local Flood Authority.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Modify the wording to policy H5 as follows:

1 Amend the new homes target in the introductory and main part of the policy as follows:
Land at Wool as shown on the policies map will help to meet the District's development needs by providing a total of a minimum 470 new homes, a 65 bed care home, community facilities and supporting infrastructure.....

.....Housing development on all the allocated sites in Wool will be expected to:

a. improve accessibility between the sites and nearby services (including Wool Railway Station and Dorset Innovation Park) and facilities by making appropriate proportionate contributions towards the forming or improving of defined walking and cycling routes;

b. provide appropriate proportionate contributions towards ~~details of improvements to the travel interchange at Wool Railway Station to include additional car parking, secure cycle storage, and electric vehicle charging points;~~

c. ~~include details in a traffic statement or assessment of the likely impact on the safety risk at the level crossing and mitigation measures that satisfy Network Rail and the Highways Authority~~

d. include details in a traffic statement or assessment of the likely impacts on the improvements to the local road network (C6) and make appropriate proportionate contributions towards a program to reduce volumes of traffic on the A351 by encouraging use of the C6 road;

e. provide appropriate proportionate financial contributions towards ~~for~~ education (as required by Policy I1); and

f. conserve, and where appropriate look for opportunities to enhance, the significance of heritage assets including: scheduled monuments, listed buildings on neighbouring land and non-designated heritage assets within development sites.

2. Amend the section relating to 'Land to the west of Chalk Pit Lane and Oakdene Road' as follows:

Land as shown on the policies map will help to meet the District's housing needs by providing a minimum of up to 320 new homes, a 65 bed care home, community facilities and infrastructure

3. Amend the section relating to 'Land to the north east of Burton Cross Roundabout' as follows:

Land as shown on the policies map will help to meet the District's housing needs by providing a minimum of up to 90 new homes, community facilities and infrastructure

4. Amend the section relating to 'Land to the north west of Burton Cross Roundabout' as follows:

Land as shown on the policies map will help to meet the District's housing needs by providing a minimum of up to 30 new homes, ~~community facilities and infrastructure~~

5. Amend the section relating to 'Land to the north of the railway line' as follows:

Land as shown on the policies map will help to meet the District's housing needs by providing a minimum of up to 30 new homes. ~~community facilities and infrastructure~~

Respond to the requested clarifications and other questions set out in our representations to the viability evidence base.

If you have any supporting documents please upload them here. letter-report-vision-plans (1)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters

3 December 2018
WOOL R19 -COVERING LETTER-FINAL-03.12.18



Purbeck Local Plan Consultation
Purbeck District Council Offices
Worgret Road
Wareham
Dorset
BH20 4PP

Andrew Fido

By email to: localplan@purbeck-dc.gov.uk

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered

that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham & Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' is further clarified to ensure that there are no references to infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



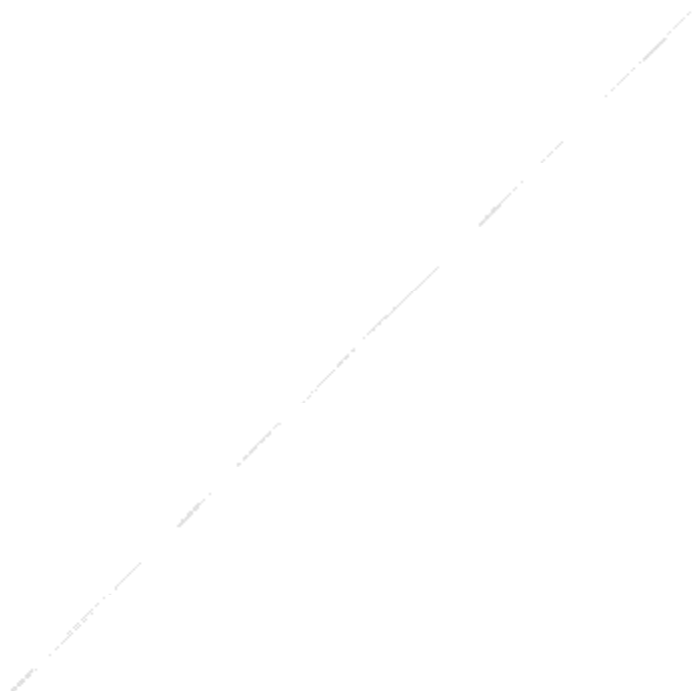
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Viability Assumptions

Introduction

Dixon Searle Partnership (DSP) were commissioned by Purbeck District Council ('the Council') to produce a Local Plan Viability Study (the DSP Viability Appraisal) to support the Purbeck Local Plan 2018 – 2034 Pre Submission Draft and Revised CIL. The consultation closes on 3rd December 2018.

The DSP Viability Appraisal is a desk based study based on information provided by the Council and a number of viability assumptions made by DSP. The viability assessments are based on a series of residual valuation scenarios that model the gross development value achievable from different uses, in different areas within the Borough, and discounts development costs, including the cost of policy compliance and section 106 contributions, interest costs and developer's profit. The residual sum that is left is then compared on a price per Ha basis with varying Benchmark Land Values (BLV's).

The subject site falls within the Purbeck sub market and as an allocated residential Site of over 200 units would be nil rated under the proposed levy. A map showing a visual representation of the proposed Charging Zones can be seen below:



Area Wide Map of the CIL Charging Zones

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that “*where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer*” (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision 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 Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 425429
 drawing no MP001
 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision Plan - 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title Wool Vision Plan - 650 homes
 project Wool Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

3 December 2018
WOOL R19 -COVERING LETTER-FINAL-03.12.18-revised



Purbeck Local Plan Consultation
Purbeck District Council Offices
Worgret Road
Wareham
Dorset
BH20 4PP

Andrew Fido



By email to: localplan@purbeck-dc.gov.uk

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered

that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham and Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' (the Regulation 123 list) is further clarified to ensure that there are appropriate references of infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations. The Regulation 123 list should therefore require that certain infrastructure projects relevant to the development of Wool (emerging PLP Policy H5) (and the other zero CIL rated sites) will be funded by Section 106 contributions.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



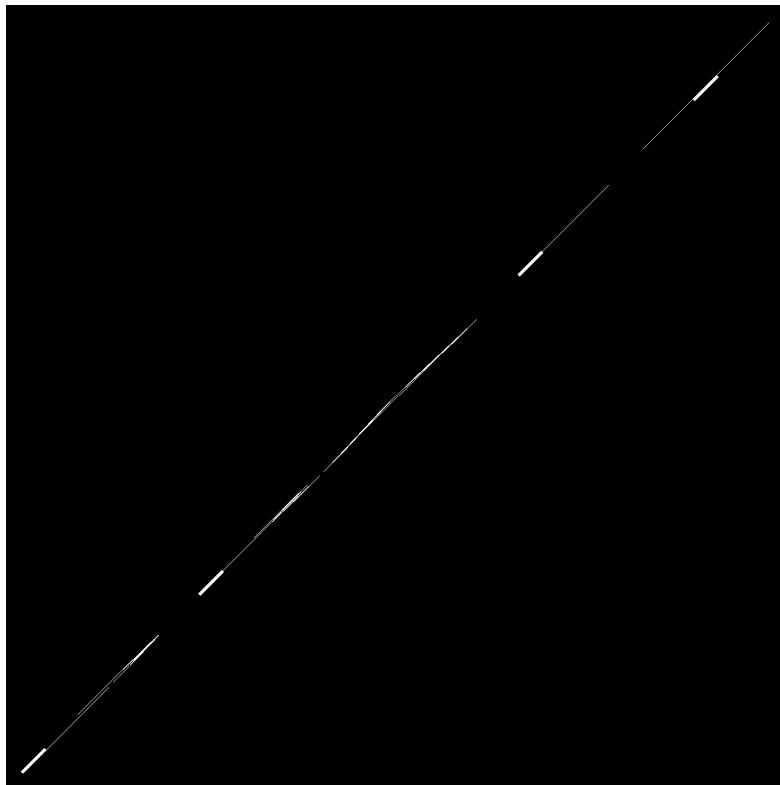
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, 'Construction Costs' heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that *“where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer”* (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd.
Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.



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

title: Wool Vision Plan - 470 homes
 project: Wool Masterplan revision: -
 client: Weld Estate/Redwood Partnership date: 03 December 2018
 job no: WIPL 425429 drawn by: SM
 drawing no: MP001 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

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd.
Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	██████████
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP501
Response Date	03/12/18 17:55
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	letter-report-vision-plans 03.12.18 wool-letter-report-vision-plans-revised.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H11

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is that some limited elements of Policy H11 are potentially not sufficiently justified or consistent with National Policy.

Our clients recognise and support the capability of the Wool urban extension to provide a high level of affordable housing commensurate with its greenfield status. However, in light of our client's representations on the PDC viability evidence base (see separate representations for detail) our clients consider that this policy is not currently sufficiently evidenced and therefore potentially not fully consistent with National Policy.

Our clients' concerns include that the PDC key viability evidence base (the Dixon Searle Partnership Viability Update Report 2018 (hereafter the 'DSP viability appraisal')) states that the 40% affordable housing target is 'challenging' for Wool under some assumptions (para 3.3.5 and 3.3.8). In addition there are some concerns regarding the transparency and assumptions behind various costs (see separate representations for further detail).

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. On resolution of the requested clarifications of the viability evidence base, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to considerations of the 'Soundness' of the emerging PLP, and ensure that the emerging PLP's policies and the community's aspirations are realistic and deliverable.

In these circumstances our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the Viability Update Report to be more clearly and transparently specified.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Our clients' representations to the emerging Purbeck Local Plan (emerging PLP) evidence base relating to viability should be addressed and the minor inconsistencies between infrastructure requirements set out in emerging PLP policy and the key PDC evidence base of the Infrastructure Development Plan and the viability assessment resolved. With the further clarifications requested, greater confidence as to an appropriate figure within the 30-40% range that is considered a more realistic expectation for the Site (depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership) can be confirmed for Wool.

In terms of the format and layout of the emerging PLP text, it may be more appropriate for a specific affordable housing requirement to be set out in Policy H5 Wool, leaving policy H11 to deal with District-wide affordable housing provision. We note that the introductory paragraph to Policy H11 already facilitates this:

'When determining planning applications for all new residential development, including residential elements of mixed use schemes, unless specifically stated as a requirement in the allocation of the site, affordable housing will be required as follows:'

Change the penultimate paragraph to remove the reference to 'exceptional' as follows:

Where an applicant considers there are significant economic viability constraints that would prevent the provision of affordable housing in accordance with the policy, they will be required to provide full justification of exceptional the circumstances to the Council's satisfaction. Where a viability assessment is required, it should refer back to the viability assessment that informed the plan, providing evidence of what has changed since then. Any viability assessment will be funded by the applicant and should reflect the government's recommended approach as set out in National Planning Practice Guidance. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

If you have any supporting documents please upload them here. letter-report-vision-plans 03.12.18

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters

3 December 2018
WOOL R19 -COVERING LETTER-FINAL-03.12.18



Purbeck Local Plan Consultation
Purbeck District Council Offices
Worgret Road
Wareham
Dorset
BH20 4PP

Andrew Fido

By email to: localplan@purbeck-dc.gov.uk

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered



that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham & Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' is further clarified to ensure that there are no references to infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



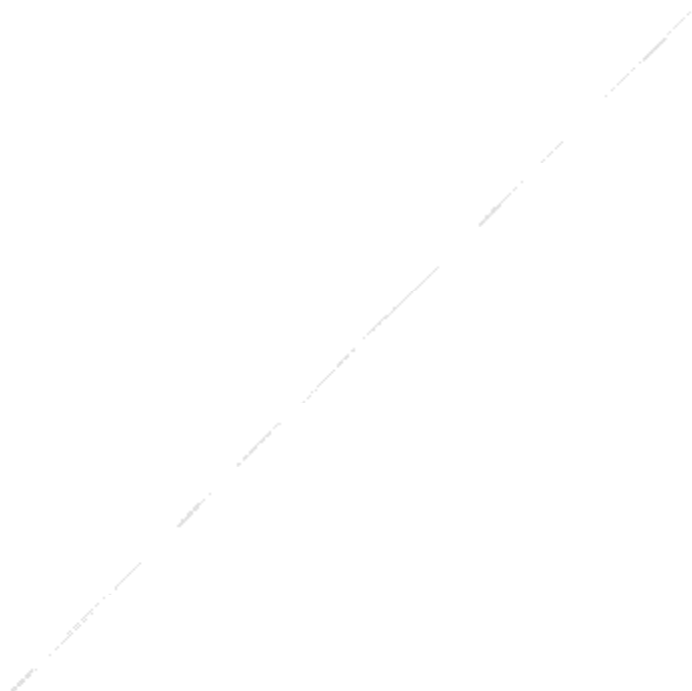
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Viability Assumptions

Introduction

Dixon Searle Partnership (DSP) were commissioned by Purbeck District Council ('the Council') to produce a Local Plan Viability Study (the DSP Viability Appraisal) to support the Purbeck Local Plan 2018 – 2034 Pre Submission Draft and Revised CIL. The consultation closes on 3rd December 2018.

The DSP Viability Appraisal is a desk based study based on information provided by the Council and a number of viability assumptions made by DSP. The viability assessments are based on a series of residual valuation scenarios that model the gross development value achievable from different uses, in different areas within the Borough, and discounts development costs, including the cost of policy compliance and section 106 contributions, interest costs and developer's profit. The residual sum that is left is then compared on a price per Ha basis with varying Benchmark Land Values (BLV's).

The subject site falls within the Purbeck sub market and as an allocated residential Site of over 200 units would be nil rated under the proposed levy. A map showing a visual representation of the proposed Charging Zones can be seen below:



Area Wide Map of the CIL Charging Zones

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that “*where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer*” (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision 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 Masterplan
 client | Weld Estate/Redwood Partnership
 job no | WPL 425429
 drawing no | MP001
 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision Plan - 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title | Wool Vision Plan - 650 homes
 project | Wool Masterplan
 client | Weld Estate/Redwood Partnership
 job no | WPL 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

3 December 2018
 WOOL R19 -COVERING LETTER-FINAL-03.12.18-revised



Purbeck Local Plan Consultation
 Purbeck District Council Offices
 Worgret Road
 Wareham
 Dorset
 BH20 4PP

Andrew Fido

By email to: localplan@purbeck-dc.gov.uk

Wessex House
 Wimborne BH21 1PB
 T: +44 (0) 1202 856 800
 F: +44 (0) 1202 856 801
 savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered

that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham and Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' (the Regulation 123 list) is further clarified to ensure that there are appropriate references of infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations. The Regulation 123 list should therefore require that certain infrastructure projects relevant to the development of Wool (emerging PLP Policy H5) (and the other zero CIL rated sites) will be funded by Section 106 contributions.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



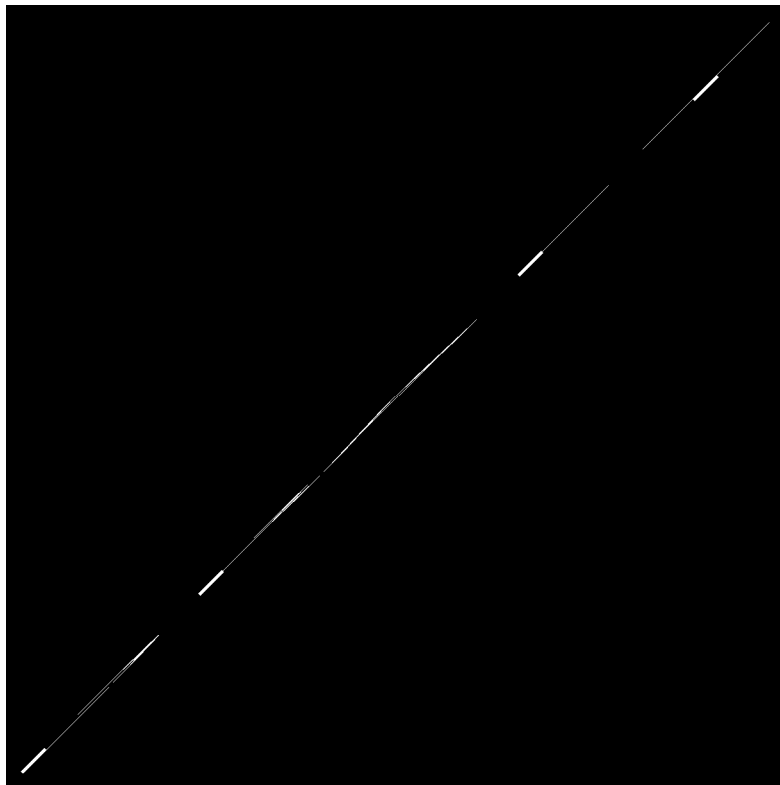
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council's Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, 'Construction Costs' heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that *“where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer”* (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.



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

title: Wool Vision Plan - 470 homes
 project: Wool Masterplan
 client: Weld Estate/Redwood Partnership
 job no: WIPL 425429
 drawing no: MP001
 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

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd.
Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

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

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	██████████
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP503
Response Date	03/12/18 18:02
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	letter-report-vision-plans (3)

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Para 7 / policies map / Wool inset map

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is a small inconsistency between the emerging Purbeck Local Plan 'policies map', the Wool Inset Map, and the plan accompanying the Policy H5: Wool allocation on page 56 of the emerging Purbeck Local Plan.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The policies map, Wool Inset Map and plan at page 56 should be made consistent

If you have any supporting documents please upload them here. letter-report-vision-plans (3)
letter-report-vision-plans

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters

3 December 2018
 WOOL R19 -COVERING LETTER-FINAL-03.12.18



Purbeck Local Plan Consultation
 Purbeck District Council Offices
 Worgret Road
 Wareham
 Dorset
 BH20 4PP

Andrew Fido



By email to: localplan@purbeck-dc.gov.uk

Wessex House
 Wimborne BH21 1PB
 T: +44 (0) 1202 856 800
 F: +44 (0) 1202 856 801
 savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
 Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered



that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham & Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' is further clarified to ensure that there are no references to infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



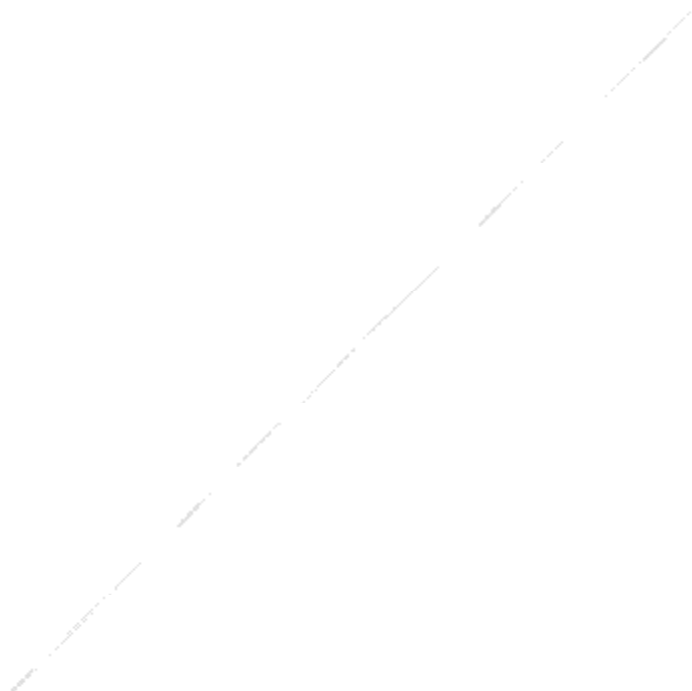
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Viability Assumptions

Introduction

Dixon Searle Partnership (DSP) were commissioned by Purbeck District Council ('the Council') to produce a Local Plan Viability Study (the DSP Viability Appraisal) to support the Purbeck Local Plan 2018 – 2034 Pre Submission Draft and Revised CIL. The consultation closes on 3rd December 2018.

The DSP Viability Appraisal is a desk based study based on information provided by the Council and a number of viability assumptions made by DSP. The viability assessments are based on a series of residual valuation scenarios that model the gross development value achievable from different uses, in different areas within the Borough, and discounts development costs, including the cost of policy compliance and section 106 contributions, interest costs and developer's profit. The residual sum that is left is then compared on a price per Ha basis with varying Benchmark Land Values (BLV's).

The subject site falls within the Purbeck sub market and as an allocated residential Site of over 200 units would be nil rated under the proposed levy. A map showing a visual representation of the proposed Charging Zones can be seen below:



Area Wide Map of the CIL Charging Zones

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that “*where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer*” (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision 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 Masterplan revision | -

client | Weld Estate/Redwood Partnership date | 03 December 2018

job no | WPL 425429 drawn by | SM

drawing no | MP001 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

urban design studio

Southampton
Birmingham
Cambridge
London
Oxford

savills.com/urbandesign

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision Plan - 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title Wool Vision Plan - 650 homes
 project Wool Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Comment

Agent	Mr Andrew Fido (1190690)
Email Address	██████████
Company / Organisation	Savills
Address	Wessex House Wimborne BH21 1PB
Consultee	(1190693)
Company / Organisation	Lulworth Estate, Redwood Partnership, Mr A.Jackson
Address	c/o Planning Savills Wimborne BH21 1PB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lulworth Estate, Redwood Partnership, Mr A.Jackson (- 1190693)
Comment ID	PLPP505
Response Date	03/12/18 18:06
Consultation Point	Policy I1: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	WOOL R19 -Letter-report-vision plans-03.12.18.pdf
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy I1
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The reason for unsoundness is that some limited elements of Policy I1 are potentially not sufficiently justified or consistent with National Policy.

Our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that meet the statutory CIL tests and NPPF, namely that they are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (see separate representations) are relevant, which request further clarifications as to the assumptions used and raise other specific questions.

Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Our client's representations to the emerging Purbeck Local Plan (emerging PLP) evidence base relating to viability should be addressed and the minor inconsistencies between infrastructure requirements set out in emerging PLP policy and the key PDC evidence base of the Infrastructure Development Plan and the viability assessment resolved.

With the further clarifications requested, greater confidence can be obtained as to whether the level of the education contribution is realistic and deliverable, which will be important in relation to Soundness.

If you have any supporting documents please upload them here. WOOL R19 -Letter-report-vision plans-03.12.18.pdf

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

Yes I wish to participate at the oral examination in order to aid the Examiner's consideration of these matters.

3 December 2018
WOOL R19 -COVERING LETTER-FINAL-03.12.18



Purbeck Local Plan Consultation
Purbeck District Council Offices
Worgret Road
Wareham
Dorset
BH20 4PP

Andrew Fido

By email to: localplan@purbeck-dc.gov.uk

Wessex House
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
F: +44 (0) 1202 856 801
savills.com

Dear Sir or Madam,

REPRESENTATIONS ON BEHALF OF THE LULWORTH ESTATE, REDWOOD PARTNERSHIP AND MR ANDREW JACKSON

PURBECK LOCAL PLAN PRESUBMISSION PUBLICATION DRAFT

Introduction

The following representations are submitted on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson (hereafter 'our clients') in respect of their land interests at Wool. Together these form the basis of land identified in the Purbeck Local Plan Pre-submission Publication Draft (hereafter 'emerging PLP') for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure under Draft Policy H5:Wool.

Previous representations were (most recently) submitted to the Council's 'New Homes for Purbeck' Consultation (March 2018). These were accompanied by supplementary information including a site specific 'Wool Concept Framework', a Heritage Appraisal and a Flood Risk and Surface Water Drainage technical overview, all confirming the appropriateness of their landholdings to accommodate up to 1,000 houses.

Our clients support the allocation of their land at Wool (hereafter 'the Site'), and recognise and support the Local Plan evidence base which confirms this as an appropriate deliverable and developable housing allocation on account of it being:

- A sustainable location for housing – An urban extension to the settlement of Wool (which occupies the second tier of the settlement hierarchy) which contains existing education and health care facilities that can be expanded, and other facilities to meet day to day needs. It is also accessible to Wool mainline railway station which provides connections to nearby major towns (and onward services to London Waterloo and Weymouth) and adjoins the Dorset Innovation Park (Dorset's only Enterprise Zone), which offers current and future employment opportunities accessible by sustainable transport options.
- Within a less environmentally constrained part of the District – The allocation is outside of the Dorset Heathlands SPA/SAC/Ramsar/SSSI nature conservation designations and buffer which covers approximately 36% of the District; the Dorset Green Belt which covers approximately 25% of the District; the Dorset AONB which covers approximately 60% of the District; and other designations applicable to other parts of the District such as the Jurassic Coast World Heritage Site and land within Flood Zones 2 and 3 (i.e. at a medium or higher probability of flooding from rivers and the sea).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





- Able to deliver the required Suitable Alternative Natural Greenspace. This is capable of being delivered on nearby adjoining land under our clients control, in a form and location that has already been agreed, in principle, with Natural England and the District Council.

Wool

The Wool housing allocation represents an inherently sustainable location for future housing development, close to education and other existing community facilities within Wool and adjacent to the existing settlement boundary. It is a unique opportunity in a location with access to a range of services and facilities including the employment opportunities at Dorset Innovation Park (Enterprise Zone) and the sustainable transport option of the nearby mainline railway station.

It is also considered to represent an exciting opportunity to work in collaboration with Purbeck DC to deliver a high quality, integrated and inclusive new community which respects its landscape and heritage setting, provides new homes to meet the varied needs of the community, includes open space, SANG and SUDS facilities, and offers routes to encourage walking, cycling and the use of public transport.

We enclose an indicative masterplan, which has been updated to accord with the requirements of Draft Policy H5, and which demonstrates how 470 homes, a 65 bed care home and the other required elements, including large areas of public open space and sustainable drainage, can be delivered on the Site. We also enclose a version which demonstrates how 650 homes, plus the other requirements, could be delivered on the Site which supports our representations to Policy H2: the housing land supply. As highlighted above, previous representations confirm the opportunity for 800 plus homes (the upper figure in the Council's New Homes for Purbeck Consultation (March 2018)).

Summary of Representations

Overall, our clients welcome the direction of the emerging Local Plan and consider that this represents a positive step in planning for the long term growth and development of Purbeck District. In particular, our clients strongly support the identification of Wool for a housing led development as fully supported by the Council's evidence base.

Our clients' observations and comments do, however, include the identification of some areas of the emerging PLP that should be amended to ensure that the emerging PLP is found sound at Examination.

These comments are set out with regards to matters of soundness, (in detail), on the enclosed Representation Response Forms, which provide specific responses to each relevant policy and are summarised as follows.

- 1) **Paragraph 9 evidence base/viability** – Whilst supportive of the overall approach to viability set out in the PDC evidence base of the Dixon Searle Partnership 'Viability Update Report 2018' (hereafter the 'DSP viability appraisal'), our clients particularly note the overall conclusion that the 40% affordable housing target is '*challenging*' for Wool under some assumptions (para 3.3.5 and 3.3.8) and the various uncertainties identified by this '*high level review*' (para 2.10). These include that: '*with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at these locations*' (para 3.3.9) and '*changes in assumptions, even if apparently small e.g. owing to unidentified abnormal costs/potentially negative viability outcomes from development or any necessary land value flex – can have an impact on the overall results*' (3.3.10). In that regard our clients have a number of comments on some of the assumptions used in the DSP viability assessment and the minor inconsistencies between infrastructure requirements set out in emerging PLP Policy H5, the PDC Infrastructure Delivery Plan and the viability assessment that are set out in the enclosed representation form and the supporting Savills Report 'Representations on the Viability Evidence Base' which we request are addressed.

Our clients' (high level) analysis supports the conclusion that a 40% affordable housing target is 'challenging', but indicates that between 30% - 40% affordable housing could be a more realistic expectation for the Site, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership. With the further clarifications requested, greater confidence as to an appropriate figure within this range can be confirmed. This will be important in relation to Soundness and ensure that the emerging PLP's policies and the communities aspirations for delivery are realistic and deliverable.

Overall, given the apparent inconsistencies and acknowledged limitations of the evidence base, it is considered necessary and appropriate for relevant policies of the emerging PLP relating to providing housing at Wool (Policy H5; Policy H3 new housing requirements; Policy H9 housing mix, Policy H10 Part M of the Building Regulations; Policy H11 affordable housing; and Policy I1 developer contributions to deliver Purbeck's infrastructure) to retain the current wording which provides an opportunity for a viability assessment to be submitted by the applicant at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan stage. However, at this stage and in order for this element of the policy to be effective and comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability assessment to be more clearly and transparently specified.

Our clients anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of such matters in time for the Examination.

- 2) **Policy E12: Design** – whilst in broad support of this policy our clients have some concerns regarding the references in the supporting text (emerging PLP, para 104) to the use and applicability of Supplementary Planning Documents (SPDs) including the Wool Townscape Appraisal (2012). Our clients do not believe the use of these SPDs is justified given their dated nature, the current context of the emerging PLP and the absence of clear and applicable development management guidance within the SPD.
- 3) **Policy H2: The housing land supply** – whilst in broad support of this policy, our clients have some concerns that there may be a potential over reliance on the delivery of 933 homes over the plan period through unidentified 'small sites next to existing settlements' (270 homes) and 'windfall within existing settlements' (663 homes). As there is an acknowledged additional capacity at Wool for more than the current allocation of 470 houses (as confirmed by the Council's Homes for Purbeck Consultation (2018) and the Housing Paper), it is suggested that at least 650 homes could be delivered at Wool without an unacceptable impact arising.
- 4) **Policy H3 – New housing development requirements** – whilst in broad support of this policy, our clients have some concerns regarding some of the wording and believe it would benefit from some minor amendments regarding the references to charging points for electrical vehicles and transport impacts. Our comments regarding the viability evidence base (as set out above) are also relevant.
- 5) **Policy H5: Wool**– whilst our clients strongly support this policy, we consider that the wording would benefit from minor amendments. This includes setting the housing target as a minimum rather than a maximum, and ensuring that the identified infrastructure requirements are reasonably related to the proposed development, and are correctly sought as financial contributions towards provision rather than actual physical delivery and are consistent with the PDC Infrastructure Delivery Plan (Appendix 4 – Infrastructure Delivery Plan Schedule). Our client's representations to the viability evidence base; policy H2 (relating to the potential for at least 650 homes at Wool); policy H11 affordable housing and policy I1 developer contributions are also relevant.
- 6) **Policy H11: Affordable housing** –our clients recognise and support the capability of the Wool allocation to provide a high level of affordable housing commensurate with its greenfield status. However, in light of their representations on the viability evidence base set out above it is considered



that this policy is not currently sufficiently evidenced and therefore not fully consistent with National Policy.

However, once our clients' comments on some of the assumptions used in the viability assessment are addressed and the minor inconsistencies between infrastructure requirements set out in PLP policy, the IDP and the viability assessment are resolved (as set out in the enclosed representation form and the enclosed report which our clients request are addressed) a revised affordable housing target can be set with sufficient confidence. This could be in the range of 30-40%, depending on the precise costs, Section 106 assumptions, and assuming a housing tenure mix of 10% social rent, 20% affordable rent and 70% shared ownership.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 7) **Policy I1: Developer contributions to deliver Purbeck's infrastructure** - our clients recognise and support the capability of the Wool allocation to make proportionate contributions to infrastructure that are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

With regards to the level of education contributions set out in Policy I1, our client's representations to the emerging PLP viability evidence base (set out above) are relevant, which request further clarifications as to the assumptions used and raise other specific questions. Following the requested further detail, clarifications and consultation; greater confidence can be gained as to whether the emerging PLP's policies are realistic and deliverable, which will be important in relation to Soundness.

In any event, our clients fully support the current wording which provides an opportunity for a viability assessment to be submitted at the planning application stage to set out any justification for any changes from the viability assessment undertaken at the Local Plan Stage. However in order for this element of the policy to be effective, and in order to comply with the NPPF and PPG, it is necessary for the assumptions behind the DSP viability appraisal to be more clearly and transparently specified and subject to consultation.

- 8) **Proposals Map** – our clients note some small inconsistencies between the Purbeck 'Wool proposals map' and the plan accompanying Policy H5: Wool on page 56.
- 9) **Community Infrastructure Levy Draft Charging Schedule** – our clients support the confirmation that the Wool allocation under policy H5 (as an allocated residential site in the Wareham & Purbeck Rural Centre of 200 or more dwellings) is proposed to be 'nil rated' for CIL. However, they wish to ensure that the section in the Draft Charging Schedule entitled '*Infrastructure projects to be funded at least in part by the CIL*' is further clarified to ensure that there are no references to infrastructure intended to be funded by CIL to avoid double counting. It is important that any future section 106 obligations for the policy H5 site meet the relevant tests of Regulation 122 and 123 of the CIL Regulations.

We would welcome the opportunity to continue the process of engagement with the Council and to appear at the Examination to inform the Examiner's consideration of the emerging PLP, as appropriate.



Yours sincerely



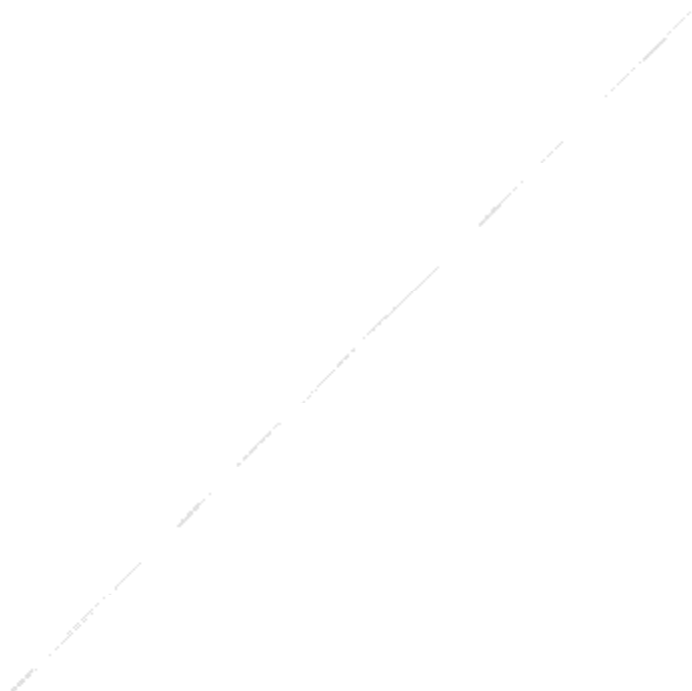
Andrew Fido
Associate Director

cc: Mr J. Weld, Lulworth Estate; Mr V. Dominey, Redwood Partnership; Mr A. Jackson
Enc: Completed representation forms plus supplementary comparison table referred to in representations
Savills Report 'Representations on the Viability Evidence Base;
Indicative 470 home and 650 home Wool Vision Plans

Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Appendix 1: Separate representation forms



Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Regulation 19 Representations to the Purbeck Local Plan:
Savills on behalf of the Wool Urban Extension Landowners

December 2018

Representations to the Viability Evidence Base/para 8-9

Supplementary comparison table referred to in viability representations

For ease of reference, a summary and comparison of the IDP (appendix 4) requirements and the DSP viability appraisal S106 assumptions are provided in the following table:

IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Note: this table is enclosed as a separate appendix owing to potential formatting issues potentially apparent from the PDC Reg 19 Consultation Portal. I

Purbeck District Council's Submission Draft Local Plan: Representations on the Viability Evidence Base

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Contents

1.	Introduction	1
2.	Viability Assumptions	3
3.	Conclusion	13

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



1. Introduction

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Introduction

This representation has been prepared by Savills (UK) Limited (hereafter “Savills”) on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson (hereafter ‘Landowners’) in respect of their land interests at Wool which are identified in Purbeck District Council’s (hereafter “the Council”) Purbeck Local Plan Pre-submission Publication Draft (hereafter “PLP”) for a residential led allocation of 470 homes, a 65 bed care home, community facilities and supporting infrastructure including a requirement for a SANG under policy H5:Wool.

Overall, our clients welcome the direction of the emerging PLP and consider that this emerging document represents a positive step for planning in Purbeck District. In particular our clients strongly support the identification of Wool for a housing led development as fully supported by the Council’s evidence base.

Whilst supportive of the overall approach to viability assessment set out in PDC’s evidence base of the Dixon Searle Partnership (hereafter ‘DSP’) *Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018* (hereafter ‘ DSP viability appraisal’) we have a number of comments on some of the detailed assumptions used in the DSP viability appraisal and also highlight other minor inconsistencies between infrastructure requirements set out in PLP policy, the PLP Infrastructure Delivery Plan (hereafter ‘IDP’) and the DEP viability appraisal that we request are addressed.

This representation therefore explores whether PDC has presented appropriate evidence, come to reasonable conclusions and accords with the Government’s viability guidance set out in the Planning Practice Guidance (July 2018), namely that:

‘Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’.

We anticipate that further ongoing discussions with PDC and their consultants DSP will resolve a number of matters in time for the Examination.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



2. Viability Assumptions

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Viability Assumptions

Introduction

Dixon Searle Partnership (DSP) were commissioned by Purbeck District Council ('the Council') to produce a Local Plan Viability Study (the DSP Viability Appraisal) to support the Purbeck Local Plan 2018 – 2034 Pre Submission Draft and Revised CIL. The consultation closes on 3rd December 2018.

The DSP Viability Appraisal is a desk based study based on information provided by the Council and a number of viability assumptions made by DSP. The viability assessments are based on a series of residual valuation scenarios that model the gross development value achievable from different uses, in different areas within the Borough, and discounts development costs, including the cost of policy compliance and section 106 contributions, interest costs and developer's profit. The residual sum that is left is then compared on a price per Ha basis with varying Benchmark Land Values (BLV's).

The subject site falls within the Purbeck sub market and as an allocated residential Site of over 200 units would be nil rated under the proposed levy. A map showing a visual representation of the proposed Charging Zones can be seen below:



Area Wide Map of the CIL Charging Zones

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



As a nil rated CIL site, appropriate and proportionate developer contributions to infrastructure are therefore to be sourced from section 106 contributions. These and other obligations/requirements are set out in both PLP site specific and topic specific policies (namely the site specific policy H5; H3 new housing requirements; H9 housing mix, H10 Part M of the Building Regulations; H11 affordable housing; and I1 developer contributions to deliver Purbeck's infrastructure), and are supported by the evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to the site allocations, including Wool. The likely policy requirements and obligations are quantified by DSP in consultation with PDC and used in the DSP Viability Assessment.

Sensitivity Testing

DSP have undertaken modelling for the draft allocation of 466 no. dwellings on the following bases:

- No sheltered housing & 20% developer's margin & £0 CIL;
- No sheltered housing & 17.5% developer's margin & £0 CIL;
- 20% Sheltered housing & 20% developer's margin & £0 CIL;
- 17.5% Sheltered housing & 20% developer's margin & £0 CIL.

The above has been set against two value Tiers, 'Lower Value' and 'Typical Values'. More detail is provided on these later in this report. The results of the Residual Land Values (RLVs) are then compared with a Benchmark Land Value.

Benchmark Land Values (BLV's):

BLV's form a fundamental input within viability testing and as such it is vital that methodology and assumptions are clearly set out and supported with evidence. From our review of the commentary within the DSP Appraisal (page 37), it would appear that the following BLV's have been adopted for the draft allocation in Wool:

- £250,000 per gross Ha (£100,000 per gross acre);

DSP state that the minimum prices agreed within Option Agreements are typically £250,000 - £370,000 per gross Ha (£100,000 - £150,000 per gross). This is based on an EUV multiple approach utilising EUV's of £20,000 - £50,000 per gross Ha. We can see from Appendix IIC that an EUV of £25,000 per gross Ha (£10,117 per gross acre) has been chosen for the subject site in Wool. It is unclear why DSP are applying the lowest multiple of 10 which provides for a surprising low BLV for Greenfield sites in the District. By way of a comparison, adjoining Local Authority Borough of Poole have relied upon an EUV multiple approach utilising a multiple of 20.

Furthermore, Savills has reviewed the DSP Viability Appraisal and the accompanying appendices. However, no evidence has been provided by DSP to support the EUV's and resultant BLV for Greenfield sites.

DSP state that they have relied upon additional sources of information to inform their views on EUV's and BLV's, although it is not explicitly stated where supporting evidence may be found within additional documentation. We

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



would urge that any supporting evidence relied upon by DSP from additional sources is summarised and tabulated within consultation documentation with the source and date of document clearly stated.

Viability Buffer

No explicit allowance has been made for a viability buffer. DSP state that “*where the result of an appraisal reaches a higher value than the BLV then we have a positive viability scenario. If all planning obligations and policy costs are already included within the appraisal then the surplus acts as an additional buffer*” (page 13 DSP Viability Appraisal). We would disagree with this approach and ask that a viability buffer of no lower than 30% is included within all modelling explicitly and applied to the BLV as an additional fixed cost. This would increase the BLV from £250,000 per gross Ha to £357,142 per gross Ha. This is the common approach adopted in other local authority areas when determining the viability of CIL.

Revenues

Open Market

New build sales values on a £ per sq m basis will vary depending on location, specification, size of the dwelling and the scale of development within which the dwellings sits. 11 no. value tiers have been tested from £2,500 - £5,900 per sq m across the Charging Area. An allowance of £3,300 per sq m (£307 per sq ft) VL3 has been allowed for the draft strategic allocation in Wool, which sits towards the lower range when compared to the wider borough.

Strategic sites of this size will usually be marketed by releasing phased development parcels, often there are several house builders on site actively marketing separate phases at one given period creating a diluted market. Therefore, we would expect to see some form of discount to the open market values applied to reflect this. For the purposes of determining viability the outputs when adopting the typical values should be disregarded and we support the use of the lower range of values as a more realistic benchmark.

Grounds Rents

An allowance of £315,000 has been included within the appraisals for the subject draft allocation. The Government published a press release on 21 December 2017 titled “Crackdown on unfair leasehold practices” following a consultation paper issued in the summer last year. They have now announced new measures to cut out unfair and abusive practices within the leasehold system, including changes so that ground rents on new long leases – for both houses and flats – are set to zero.

A consultation paper was released on 15th October 2018. This includes introducing a standard cap for future ground rents on new build apartments and houses at £10 per annum. It is expected that the earliest date for relevant legislation to take effect will be late-2020, and likely not until beyond then. The paper states ‘should our proposals be taken forward in 2019, any legislation would unlikely complete its passage until mid-2020 at the earliest’. It is therefore proposed that a cap on ground rents should come into force three months after the commencement of the Act.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Given the draft allocation status, it is highly likely that legislative measures will be in place and have been in place for some time before the construction and sale of individual leasehold interests. We therefore consider that the associated revenue is removed.

Affordable Housing Revenue

Affordable housing is a key component of CIL and local plan viability testing. It is therefore of paramount importance that the affordable housing assumptions are realistic and reflective of current market conditions and planning policy. For wider testing, DSP state that they have tested between 20 - 50% onsite affordable, on the assumption that 65% is affordable rent, 10% social rent and 25% shared ownership. A 40% onsite allowance has been made for the draft allocation at Wool on the basis of the tenure mix stated. The following value have been adopted for the subject site £790 - £1,236 per sq m for social rent, £1,410 - £1,800 and £2,145 per sq m for shared ownership.

The inclusion of 10% social rent on site has a detrimental effect on viability and is undeliverable without the use of grant funding. The affordable rented tenure was created to move RPs away from capital subsidised delivery and to a long term revenue supported model by allowing a higher rent to be charged. We would suggest that for the purposes of larger scale strategic sites that a more balance tenure is required to support higher levels of affordable housing.

Construction and Sales Timescales

Construction and sales timescales, in addition to cash flow assumptions within modelling, will have a detrimental impact on the apparent viability of a development site, and is of particular relevance to larger sites where phasing is relevant.

A construction period of 48 months has been assumed for the 466 no. dwelling typology. This reflects a delivery of 9.7 dwellings per month which, even when assuming two outlets, is considered to be too short. We would ask DSP to revise this assumption to 72 months, reflecting around 60 private sales per annumh.

In addition, of concern is that there is no mention of the sales periods adopted. We seek clarification as to this point and suggest that a rate of 0.65 private sale per week per outlet is applied, which is the average sales rate in the area.

Development Costs

Baseline Construction Costs

It is vital that the baseline build cost data accurately reflects current market sentiment and is reflective of the actual costs incurred by developers. This is important as the build cost data forms the basis of other development costs within the DSP Appraisal such as professional fees, finance and contingency.

Following our review of the DSP Viability Appraisal we note that DSP have utilised current, 'Median' BCIS figures have been adopted which goes against advice from BCIS which advocates that the 'Mean' figure should be used to determine average build costs. We would therefore ask DSP to amend their assumptions.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that DSP have applied a rate of £1,210 psm to both houses and flats and a separate rate for the sheltered accommodation of £1,458 psm, which is not listed in assumptions within Appendix 1. We would expect to find a separate rate for houses and flats. The cost has been listed within their assumptions, £1,378 psm but has not been applied to the flats within the notional unit mix in the appraisals.

We have reviewed the BCIS tender price indices, and compare the latest figures against those applied to the viability appraisals:

Build Cost	DSP Report	BCIS Sept 18	Cost inflation	BCIS Sept 18 "Mean"
Estate Housing Generally	£1,210	£1,252	3.47%	£1,291
Flats Generally	£1,378	£1,458	5.81%	£1,528
Sheltered Housing Generally	£1,458	£1,538	5.49%	£1,649

This indicates that there has been substantial growth over the short period of time between the start of the viability review and its publication or that the wrong data set has been applied. We have reviewed and applied the above costs to the Wool 466 unit appraisal with no sheltered housing. The difference in cost when applying the Mean of the latest costs and applying the appropriate rate to the flats is £4,044,878. This demonstrates that there is a greater need for the viability buffer of 30% to allow for cost inflation.

External Works

It is normal practice to apply an allowance for external costs ("externals") to development appraisals. This is applied to the base build to allow for plot specific costs, such as soft and hard landscaping, such as pathways, hedgerows, trees and planting and car parking provision. We note that this has not been applied to the larger allocations within the appraisals. This is not infrastructure cost, which we outline in the proceeding section and is the cost applied within the serviced parcel.

External costs will vary from site to site and can usually only be accurately determined when the likely built form is known. We note that DSP have mentioned that they will apply an allowance for externals within the assumptions set out in Appendix 1 but these seem to have been excluded from the appraisals in Appendix 2. We agree with the allowance for externals of 10 – 15% as an addition to BCIS baseline build costs within modelling. We suggest that DSP follows their assumption and apply external costs to their based build cost.

Based on the latest cost indices this would mean that the base build cost including externals is £62,354,432, so potentially up to £11.5m higher than the assumption applied in the Wool appraisal with no sheltered accommodation.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Infrastructure Costs

An allowance of £23,000 per dwelling has been made by DSP, this is based on the range recommended within the Harman Report 2012 (£17,000 - £23,000 per dwelling). No evidence has been provided to substantiate the infrastructure costs adopted.

On site infrastructure costs cover the provision of drainage, services and utilities, to deliver the required infrastructure to deliver a serviced housing parcel. This is not to be applied in lieu of the external works costs. Such costs will have a fundamental impact to local plan viability and it is vital that any cost assumptions are supported by a robust evidence base, or in the absence of this, are based on available guidance.

We outline in the proceeding table more detailed information on site works / infrastructure costs. This is drawn from a number of development sites across the Country, which are predominantly Greenfield large scale developments in excess of 200 units. This shows a range in infrastructure costs from £7,000 to £39,879 per plot, providing an overall average of £20,821 per plot. Site specifics determine the level of infrastructure, which account for the significant variance. Therefore, it is important that the Local Plan's viability study does not misrepresent deliverability by understating infrastructure costs.

We include below our nationwide evidence for infrastructure costs:

Savills Evidence on Infrastructure / Site Works

Number	Region	Local Authority	£ per unit		
			Scheme Enabling & Abnormals	Scheme Mitigation (S. 106)	Total Site Works
200 – 500 Dwellings					
1	SW	Exeter City Council	£22,302	£6,854	£29,156
2	SW	South Hams District Council	£16,738	£5,225	£21,963
3	WM	Wychavon	£25,823	£3,288	£29,111
4	SE	Basingstoke & Deane	£17,571	£18,606	£36,177
5	EE	Babergh District Council	£30,743	£11,337	£42,080
6	WM	Stafford Borough Council	£7,000	£7,190	£14,190
AVERAGE			£20,029	£8,750	£28,779
501 – 1,000 Dwellings					
7	SE	Hart District Council	£17,630	£10,213	£27,843
8	SE	Horsham District Council	£30,145	£18,127	£48,272
AVERAGE			£23,888	£14,170	£38,058
1,001+ Dwellings					

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



9	EE	Daventry District Council	£22,163	£14,977	£37,140
10	EE	Peterborough City Council	£18,476	£17,097	£35,573
11	SW	Taunton Deane Borough Council	£39,879	£2,715	£42,594
12	EE	Cambridge City Council	£10,104	£17,741	£27,845
13	SE	Cherwell District Council	£14,628	£16,679	£31,307
14	EE	Chelmsford City Council	£16,645	£28,594	£45,239
15	SE	Winchester City Council	£22,476	£18,844	£41,320
AVERAGE			£20,624	£16,664	£37,288
AVERAGE (ALL)			£20,821	£13,166	£33,987

It is unclear if indexation has been applied to bring such costs in line with today. The indexed range is £23,000 - £32,000 per dwelling. We would therefore advocate that a higher allowance of £30,000 per dwelling is made.

Developer's Contingency

A 3% contingency has been allowed within modelling, however, it has only been applied to the construction costs. No contingency has been applied to other development costs such as fees, servicing and infrastructure. We would strongly disagree with this approach and advocate that a contingency is applied to wider development costs, inclusive of infrastructure.

It is also noted that the assumptions set out in table in Appendix 1 suggest that a 5% contingency is appropriate. We would suggest that given the scale and nature of the proposed development at Wool a 5% contingency is applied.

Developer's Profit

DSP state that 20% of Gross Development Value (GDV) for open market housing and 6% of GDV for the affordable has been adopted. However, from our review of Appendix IIC, it is clear that additional modelling at 17.5% profit has been undertaken. No justification has been provided as to why a developer's profit lower than 20% on private sale has been included. We would suggest that this test is disregarded as it does not reflect the realities of a large multi-phase and potentially multi cycle strategic development site.

We would advocate than a minimum allowance of between 20 – 25% of GDV is assumed for private and 6% for the affordable. This range is reflective of the complexity of the project, scale and embedded sales risk and we consider this to be reasonable and is supported by a number of appeal precedents.

Planning Promotion Costs

The cost of promoting a site through the planning process can be considerable, especially for sites of some 400 - 500 dwellings. It is vital that the promotion costs accurately reflect the actual costs incurred associated with promoting a site through the planning process through to delivery. This will include professional planning consultancy fees, application fees and Appeal costs.

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



We note that these fees have been reduced from their suggested assumption in Appendix 1 of 10% to 7% in the appraisals for the large strategic allocations. On this basis, we would ask DSP to adopt the figure recommended by the Harman Report (2012) which states professional fees can rise to 20% for more complex multi – phase sites.

Section 106 Costs

The PLP sets out various requirements for the Wool allocation, including those to be delivered through section 106 obligations through the site specific policy H5 and other policies including, but not limited to; H3 new housing requirements and I1 developer contributions to deliver Purbeck's infrastructure. These are more clearly quantified in the PLP evidence base of the Infrastructure Delivery Plan (IDP), with Appendix 4 of the IDP setting out an IDP schedule specific to all large site allocations, including Wool.

In terms of the uncertainties associated with the above, we particularly note those acknowledged within the DSP viability appraisal including the following: *'with, not unusually, a range of unknowns at this stage it is not possible to say exactly what level and detailed make up of planning requirements and obligations packages will ultimately be supported at this location'* (para 3.3.6).

We also note some uncertainty arising from the IDP, particularly Appendix 4: IDP Schedule, where items of infrastructure confirmed as 'essential' by PDC are specified as coming from developer section 106 contributions, but the relevant cost is not specified in all cases (see summary table below). There is also some inconsistency in wording between the site specific policy H5 requirements and the wording used in the IDP, with a need for the H5 requirements to more closely reflect the IDP wording which sets more specific and focussed requirements.

Whilst we note that some largely appropriate figures have been adopted by DSP for section 106 costs in their high level viability assessment (see summary table below) these costs are not currently sufficiently specified and/or the related key assumptions are not clear, nor have they previously been consulted on. These inconsistencies must be resolved and clarifications provided in order to confirm they form an appropriate basis for the viability assessment. In particular, the assumptions behind the costs attributed to Habitat Regulations mitigation (SANGS and Nitrogen Neutrality – see DSP para ref 2.9.7 and 2.9.8) and transport/electric vehicle charging points need to be more fully understood.

For ease of reference, a summary and comparison of the IDP requirements against the viability report s106 assumptions are provided in the following table (overleaf):

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



IDP Appendix 4: Essential Infrastructure type	IDP Appendix 4: Wool – ‘developer contributions’ and ‘cost’ columns	Costs appearing in DSP Viability Appraisal for Wool*
Heathland mitigation	S106 – cost N/A provided as part of the development	SANGS £1,500 / unit @ 466 units = £699,000
Nitrogen neutrality	S106 – cost N/A provided as part of the development	Nitrogen £300,000
Fields in trust play requirements	TBC	Play equipment £100,000
Contribution to educational costs	TBC phased S106 - £6161 per qualifying dwelling	Education £6161/unit @ 331 units = £2,039,291
Travel plan for new residential development	S106 - £10,000 (with a ?)	Travel Plan - £10,000
Improvements to transport hub, e.g. additional secure cycle parking.	S106 - TBC	Transport £200,000
Additional changes in signing to encourage traffic travelling to Wool away from the A351 and on to the A35/C6 to include online safety improvements along the C6 through Bere Regis if the transport assessment shows this development is likely to increase traffic flows on the A351.	S106 – TBC	
Electric vehicle charging points in new development, at station and Dorset Innovation park (DIP)	S106 and DLEP- £5000 each plus installation	£500/unit @ 466 units = £233,000
No entry	No entry	GP surgery £80 unit @ 466 units = £37,280

*source: Updated Viability Study to Support Purbeck District Council’s Draft Local Plan and Revised Community Infrastructure Levy 2018, DSP - Appendix IIc, Allocated Sites Summary Results for Wool Development Appraisal Summary, ‘Construction Costs’ heading

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



3. Conclusion

Draft Local Plan and Revised CIL

Consultation response on behalf of the Lulworth Estate, Redwood Partnership and Andrew Jackson



Conclusion

There are a number of assumptions made within the DSP Viability Appraisal that cause concern and there a number of areas that require clarification. On behalf of the landowners, we would advocate that the following points are addressed:

- No evidence has been provided to support both the Existing Use Values and Benchmark Land Values adopted by DSP;
- An adequate viability buffer has not been included;
- Build costs have not been applied in line with the assumptions
- No evidence has been provided to support the infrastructure costs adopted;
- No allowance has been made for external works;
- Developer's contingency has not been applied to all costs;
- No allowance has been made for promotion costs;
- Section 106 costs require clarification.

On the basis of the above, we would urge that all of the above points are addressed. In summary, the landowners need to understand more about the assumptions made and the subsequent evidence base relied upon by DSP before they can provide more detailed comments.

We therefore anticipate that further ongoing discussions will be completed with PDC and their consultants DSP in order to resolve a number of matters in time for the Examination.

Please note that the advice provided on values is informal and given purely as guidance. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. Any advice in this report or the attached documents is not in accordance with RICS Valuation – Global Standards 2017, or any subsequent edition and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such.

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision 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 Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 425429
 drawing no MP001
 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Ltd. Savills does not act as Principal Designer and this drawing is not intended to inform Construction Design Management procedures. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed.

Wool Vision Plan - 650 homes



Approximate Total no. of new dwellings:	650 homes
Total housing area:	18.15ha

title Wool Vision Plan - 650 homes
 project Wool Masterplan
 client Weld Estate/Redwood Partnership
 job no WPL 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

urban design studio
 Southampton
 Birmingham
 Cambridge
 London
 Oxford
 savills.com/urbandesign

Comment

Consultee	Dr Ian Wright (1190632)
Email Address	████████████████████
Company / Organisation	LYMPWatch
Address	THE MANSE POST GREEN ROAD Lytchett Minster BH16 6AP
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	LYMPWatch (Dr Ian Wright - 1190632)
Comment ID	PLPP201
Response Date	01/12/18 16:09
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	Chapter 1 Introduction
--	------------------------

Do you consider that the Local Plan is legally compliant?	Yes
--	-----

Do you consider that the Local Plan is sound?	Yes
--	-----

Do you consider that the Local Plan complies with the duty to co-operate?	Yes
--	-----

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The plan has apparently complied with all relevant legislation. It provides a sustainable strategy to deliver the numbers of houses where they are required consistent with the NPPF. The Council have

consulted with relevant bodies including two rounds of consultation with Purbeck residents to ensure the plan has the widest backing. In addition the Council have had meetings with LYMPWatch and other residents' groups and held public Q and A meetings. The plan avoids developer/landowner led speculative planning applications driven by profit.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Ian Wright (1190632)
Email Address	[REDACTED]
Company / Organisation	LYMPWatch
Address	THE MANSE POST GREEN ROAD Lytchett Minster BH16 6AP
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	LYMPWatch (Dr Ian Wright - 1190632)
Comment ID	PLPP202
Response Date	01/12/18 16:10
Consultation Point	Characteristics of Purbeck (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 2 Characteristics of Purbeck Para 21
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I believe it is correct to consider Lytchett Minster with a spread out population of about 110 a 'small village' as it has no infrastructure that avoids the need to travel to other places for day to day living

needs. It has no food shop, Post Office or GP surgery. It does have one small antiques shop built onto the side of a property.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Ian Wright (1190632)
Email Address	████████████████████
Company / Organisation	LYMPWatch
Address	THE MANSE POST GREEN ROAD Lytchett Minster BH16 6AP
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	LYMPWatch (Dr Ian Wright - 1190632)
Comment ID	PLPP203
Response Date	01/12/18 16:11
Consultation Point	Policy V2: Green belt (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy V2: Green Belt

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I believe the Green Belt policy within the plan is sound as it protects Lytchett Minster and near by settlements from merging with the Bournemouth/Poole conurbation and Lytchett minster from merging

with Lytchett Matravers. If the proposed phase two housing development at Policeman's Lane in Upton goes ahead then the green belt around Lytchett Minster will serve an even more important function to prevent merging with the conurbation as Parcel 23 will be the nearest point to the conurbation.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Dr Ian Wright (1190632)
Email Address	[REDACTED]
Company / Organisation	LYMPWatch
Address	THE MANSE POST GREEN ROAD Lytchett Minster BH16 6AP
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	LYMPWatch (Dr Ian Wright - 1190632)
Comment ID	PLPP204
Response Date	01/12/18 16:12
Consultation Point	Assessing flood risk (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy E4:Assessing flood risks

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

When assessing proposals for development in an area with known risks of flooding and/or critical drainage issues developers must be made to demonstrate that building on undeveloped land and

green spaces and any mitigation measures put in place will not increase the flood risk to existing properties. Developers must remain liable for an agreed time to carry out rectification measures and to compensate existing property owners should flooding occur during due to the development work.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The Flood Assessment Policy E4 should be amended to ensure that developers cannot just build and move on avoiding liability for subsequent flood problems caused by the work.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?

To expand on comments above.

Comment

Consultee	Dr Ian Wright (1190632)
Email Address	██
Company / Organisation	LYMPWatch
Address	THE MANSE POST GREEN ROAD Lytchett Minster BH16 6AP
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	LYMPWatch (Dr Ian Wright - 1190632)
Comment ID	PLPP205
Response Date	01/12/18 16:14
Consultation Point	Policy E3: Renewable energy (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Policy E3: Renewable energy

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Purbeck is a very sunny area. More importance should be attached to the provision of roof mounted solar panels to generate electricity for new houses.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Policy E3 should be amended to ensure that all properties in new housing developments have roof mounted solar panels.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Alf Bush (1191250)
Email Address	████████████████████
Company / Organisation	Lytchett Matravers Parish Council
Address	Council Office Vineyard Close Lytchett Matravers BH16 6DD
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lytchett Matravers Parish Council (Mr Alf Bush - 1191250)
Comment ID	PLPP480
Response Date	03/12/18 17:18
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Chapter 2
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Clause 45 states that 'the Purbeck Local Plan proposes to remove land from the green belt to support its strategic policy of spreading housing development across the District. NPPF requires a Local Plan

to show that 'if councils wish to allow development on green belt land there needs to be 'very special circumstances' (Green Belt Study clause 11). There is no reference to these very special circumstances (as opposed to just plain exceptional circumstances when altering a green belt boundary) and therefore the plan is not compliant with NPPF regulations.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The Local Plan has to set out what are the very special circumstances required by NPPF regulations to justify development.

The Local Plan has to set out what alternate strategies were used and, in particular, it should clearly set out why those areas of Purbeck District that are neither AONB nor Green Belt were not considered first before deciding to release Green belt.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Alf Bush (1191250)
Email Address	████████████████████
Company / Organisation	Lytchett Matravers Parish Council
Address	Council Office Vineyard Close Lytchett Matravers BH16 6DD
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lytchett Matravers Parish Council (Mr Alf Bush - 1191250)
Comment ID	PLPP496
Response Date	03/12/18 17:37
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	POlICY V2 / Policy H6
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy V2 states that 'the Council will protect the green belt, to prevent neighbouring settlements of Holton Heath, Lytchett Matravers, Lytchett Minster, Morden (East and West), Organford, Sandford,

Upton and Wareham merging. All 3 sites selected in Lytchett Matravers under Policy H6 have been designated by Purbeck District Councils Green Belt Study as serving a function on checking the merging of settlements.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Policy H6 is not in compliance with Policy V2 and the Green Belt Study.

In particular, the Green Belt Study regarding parcel 25 states that it specifically serves as a strategic check on preventing the settlements of Lytchett Minster and Lytchett Matravers from merging with one another. The same study regarding parcel 20 states that it specifically serves a function in acting as a check on the large built-up area to the east and the merging of the large built-up area with Lytchett Matravers.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Alf Bush (1191250)
Email Address	████████████████████
Company / Organisation	Lytchett Matravers Parish Council
Address	Council Office Vineyard Close Lytchett Matravers BH16 6DD
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lytchett Matravers Parish Council (Mr Alf Bush - 1191250)
Comment ID	PLPP502
Response Date	03/12/18 18:01
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H8
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Clause 148 (Small Sites Policy) states that the Council's strategies for addressing the District's development needs focus 'strategic and larger scale allocations' on land in the most sustainable

locations. Outside these areas the Council's strategy also recognises that high quality small scale development, which respects its surroundings, can have an important role in enhancing the vitality of rural communities. That definition then limits the small site policy to those areas outside of the proposed strategic and larger scale allocations.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Policy H8 fails to define those areas identified in clause 148 as 'towns and larger villages' as being outside the scope of this policy.

Lytchett Matravers is identified as a larger village and not rural, and must therefore be exempt from Policy H8. This needs to be specifically stated for Lytchett Matravers and all other 'strategic and larger scale allocations' to ensure clarity on the applicability of this policy.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Consultee	Mr Alf Bush (1191250)
Email Address	████████████████████
Company / Organisation	Lytchett Matravers Parish Council
Address	Council Office Vineyard Close Lytchett Matravers BH16 6DD
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lytchett Matravers Parish Council (Mr Alf Bush - 1191250)
Comment ID	PLPP506
Response Date	03/12/18 18:16
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H12
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy H12 states that all Purbeck excepting for Swanage, Wareham and Upton are rural. This is clearly an incomplete categorisation since the proposed development within the Local Plan has been

concentrated on strategic and larger scale allocations in other towns and large villages. Any location that is being required to accept new housing on this scale can no longer be considered a rural parish (policy H12).

The 3,000 population limit that was previously applicable, and was removed by PDC due to a technicality, needs to be re-established. That limit was set as a guideline as to the maximum size of a rural community and the spirit of that limit should be recognised. Over 3,000 residents is no longer rural.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

Due to the planned house building in Lytchett Matravers, Wool and Moreton all three locations will be significantly above the 3,000 population limit and cannot be considered rural parishes. Planning in these communities cannot be by exception, but only through longer term planning considerations.

The first line of the policy should read 'In order to meet local community needs in rural areas, except in the parishes of Swanage, Wareham, Upton, Lytchett Matravers, Wool and Moreton affordable housing will be permitted in and around existing settlements where: ...

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No

Comment

Agent	Lytchett Minster and Upton TC (1190574)
Email Address	██
Company / Organisation	Lytchett Minster and Upton Town Council
Address	1 Moorland Parade Moorland Way Poole BH16 5JS
Consultee	(1190575)
Company / Organisation	Lytchett Minster and Upton Town Council
Address	1 Moorland Parade Moorland Way Poole BH16 5JS
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Lytchett Minster and Upton Town Council (- 1190575)
Comment ID	PLPP139
Response Date	30/11/18 10:51
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	All
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? No