

Matter 1
ID: 578
Betterment Properties (Weymouth) Ltd

West Dorset, Weymouth and Portland Local Plan
Examination in Public Statement
in Relation To Matters Under Examination

MATTER 1

Statement By M D Brown FRICS MRTIP

On Behalf Of

Betterment Properties (Weymouth) Limited

WEST DORSET, WEYMOUTH AND PORTLAND LOCAL PLAN EXAMINATION IN PUBLIC

MATTER 1

QUESTION 1.1

“Have the Councils met the duty to cooperate or are there any outstanding issues?”

1. Planning Authorities have failed in the duty to cooperate. They have stated that it has agreed a Memorandum of Understanding with adjoining Authorities. Two of the adjoining Authorities have not signed up to this Memorandum. (Purbeck and East Devon)
2. The so called Memorandum of Understanding is not focus based and does not set out any outcomes from co-operation. It contains intentions which may never deliver. There is not even a statement to the effect that the signatories to the memorandum will seek to deliver the “full objectively assessed needs for market and affordable housing” across overlapping housing market areas.
3. This is contrast with documents adopted elsewhere in the country and in this respect I append Memorandum of Co-operation published by Cambridgeshire and Peterborough Councils (MDB3). The Cambridgeshire document recognises that the housing market area extends over a wider area and that it overlaps with the housing market areas of other towns.
4. By contrast, whilst the Duty to Co-operate statement identifies those discussions that have taken place the Memorandum fails to show positive outcomes or to take into account the overlapping housing market areas of East Devon, Wiltshire and South East Dorset.
5. The Cambridgeshire document identifies the dwelling requirement for each part of the housing market area and reviews have already been committed by component Authorities. The eight Authorities that were all signatory to that Memorandum agreed to the figures in the table set out in Appendix 1 of the document. These are said to represent the agreed level of provision by Districts in order to meet the overall identified need for additional housing within the Cambridge sub-region housing market area.

6. The MOU produced by West Dorset / Weymouth does not include any assessment of the need, supply or undersupply in adjoining housing market areas. There is an overlap in housing market areas, for example the flow of residents to place of employment between Dorchester / Weymouth and to other towns to the west, Blandford, Salisbury and other towns to the North and to the whole of the South East Dorset conurbation. It also ignores inflow of employees from those adjoining areas. There is no quantification in this Memorandum of Understanding as to what those might be.

7. I refer specifically to what is happening in Purbeck District and Poole Borough, because these are within my knowledge. My understanding is that there is a similar lack of co-operation between East Devon and West Dorset.

8. With regard to Purbeck in his report, the Examiner stated:-

“The Strategic Housing Market Assessment (SHMA) identifies the need for about 3,400 dwellings in the District between 2011 and 2031 (170 per annum). If the population projections are used, then the demand could be as high as 4,000 dwellings by 2026”.(4,000 by 2026 would equate to 166 per annum). MDB4 attached).

9. The Local Plan allocates some 2,400 dwellings (120 per annum), significantly lower than the objectively assessed need for the District. The Examiner for Purbeck accepted that:-

“it was reasonable for the Council to conclude that there was no certainty at the time that 170 dwellings a year could be achieved without harm to ecological interests and that the identification of a target of 120 dwellings per annum per year was therefore justified.

10. That however should not be the end of the matter, indeed it is not. Firstly, there is a major modification to the Plan which requires early review. Secondly whilst there is a discussion in the duty to co-operate statement as to whether the shortfall could be accommodated in the West Dorset area, there is no reference in the Memorandum of Understanding as to how the situation will be resolved.

11. The Examiner concluded *“The duty to co-operate, together with timing of these various documents, will ensure that cross boundary issues can be more thoroughly addressed”*. They clearly have not.

12. The Examiner in his conclusion stated *"I am also mindful that there is the potential for a significant level of development to be allocated at Crossways (on the boundary of Purbeck by West Dorset District Council, in West Dorset, Weymouth and Portland Local Plan. Also Poole Borough is proposing a review of its Core Strategy in 2013. The duty to co-operate, together with the timing of these various documents will ensure that cross boundary issues can be more thoroughly addressed"*. We know now that this is not the case. The current Joint Local Plan does not propose to accept any shortfall from Purbeck District Council. On the contrary, it has reduced the housing allocation at Crossways from that which appeared in the original draft of the Plan.
13. Furthermore, the review of the Core Strategy in Poole has only just commenced, a year late and it already is clear that the Local Planning Authority has failed to deliver the housing planned for in the first five years of the Plan period. It has failed in every year. Completions in the last year being the lowest of the last five years. A major regeneration site in the Poole Local Plan has currently stalled. 1,350 dwellings are proposed on the site of the former Power Station, but it has now been determined that housing cannot be built off the 40 ft deep concrete raft of the former Power Station and the cost of making the site ready for development, makes the development unviable.
14. Co-operation with Purbeck District Council and Poole Borough Council should have indicated that Poole Borough Council may have to revise its proposals for housing within the Borough, with a knock-on effect for Purbeck District which already had its own shortfall.
15. In these circumstances, I have to conclude that the Councils have failed in their duty to co-operate and that the Memorandum of Understanding has not examined development needs of the wider housing market area and there is no conclusions on cross boundary issues.
16. It is my belief the Memorandum of Understanding needs to go beyond matters of housing numbers and this also needs to consider economic development. The promotion of economic development is very much within the remit of the Local Economic Partnerships (LEP's) and I note that the LEP is not a signatory to the Memorandum. The strategy for economic development in the joint local plan continues to rely on existing business and enhancing skills, rather than promoting new business. In my opinion the Local Planning Authorities have failed in this aspect of the duty to co- operate.

QUESTION 1.2

“Has the Local Plan emerged from an open and transparent process that demonstrates how and why it was selected in conjunction with the public and other stakeholders?”

1. Whilst there is evidence that statutory processes have been complied with in terms of consultation, I am of the opinion that consultation with stakeholders in particular has been perfunctory. There has been no dialogue with Betterment Properties (Weymouth) Limited. The Company responded to the preparation of the Local Plan and its predecessor, the review of the Weymouth Local Plan, at all stages. The respondents own a large area of land, part of which has been identified in the Local Plan for housing. However they expected a more thorough discussion between the Planning Authorities and the Company with regard to delivery and viability of development.
2. There are clearly issues between the stakeholder and the Local Planning Authority with regard to the developable area of land, and what seems to be an ever increasing demand for physical and social infrastructure. This may impact upon delivery, particularly of affordable housing.
3. Up to this time, the Respondents have co-operated with the Planning Authority in obtaining planning consent (on Appeal) for 180 dwellings. They have agreed to a full 35% provision of affordable housing in addition to offsite infrastructure, highway infrastructure improvements, education, recreation facilities and flood relief works.
4. The Respondents have always indicated the ability to deliver a substantial level of market and affordable housing and infrastructure and is frustrated by the Planning Authority's attempts to limit the developable area, without discussion.
5. The Respondents also carried out their own community involvement exercise over two days, indicating their aspirations for the site during the period when the pre-submission draft of the Local Plan was on deposit.
6. Having finally accepted that it could not demonstrate a five year housing land supply, Weymouth and Portland Borough Council reviewed the housing provision in the Joint Local Plan. They do not appear to considered the option of increasing the site allocation at

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Appendix MDB3
Cambridgeshire & Peterborough
Memorandum of Co-operation

Cambridgeshire & Peterborough Memorandum of Co-operation

Supporting the Spatial Approach 2011-2031



Introduction: What is the Cambridgeshire & Peterborough Memorandum of Co-operation?

Why was it produced?

The Cambridgeshire & Peterborough Memorandum of Co-operation has been produced by the local authorities to support the development of a coherent and comprehensive growth strategy across Cambridgeshire & Peterborough. It has been developed in response to the removal of the statutory strategic planning tier¹.

This Memorandum builds upon a strong legacy of the local authorities working together, most notably in producing the Cambridgeshire & Peterborough Structure Plan 2003, which first set out the current spatial strategy for the wider area, and continuing through the East of England Plan and joint development strategy statements published in 2010 and 2012 (the 2012 Joint Statement is included as an appendix to this document).

What does it do?

The Memorandum aims to contribute to the achievement of sustainable development in Cambridgeshire & Peterborough, in accordance with the National Planning Policy Framework (NPPF). Delivering sustainable development necessitates the local authorities actively working together across boundaries to “meet the development needs of their area”². This collaborative approach is enshrined in the duty to co-operate included in the Localism Act 2011. Appendix 1 reflects the outcomes of co-operation across the wider housing market area to establish the levels of provision for additional housing.

Recognising the primary role that individual local authorities have in addressing the duty to co-operate through their statutory Local Plans, the overarching aim of the Memorandum is to provide *additional* evidence that the duty has been addressed. It does this by demonstrating that the emerging district-level development strategies contribute to an area-wide strategic vision, objectives and spatial strategy, and by addressing strategic spatial planning issues across the area. In this sense it fulfils the role envisaged for jointly-prepared, non-statutory documents in the NPPF³.

What topics does it cover?

The Memorandum sets out the vision and objectives for the long-term development of the area, an overview of the evidence for future levels of growth, and the broad spatial approach that will help realise the vision and the area’s growth needs. These issues form this first part of the Memorandum, published in Spring 2013 to support the submission of Local Plans.

Additionally, a second part will address the main strategic planning priorities identified in the NPPF⁴ (see Figure 1 below). To ensure that the Memorandum is truly strategic, and therefore complementary to the emerging Local Plans, issues arising under each priority have been tested to assess whether they meet the principle of “greater than local”; that is, whether the issue affects more than one district. This second part of the Memorandum will be available later in 2013.

¹ The East of England Plan was revoked in January 2013.

² *National Planning Policy Framework*, paragraph 14.

³ *Ibid*, paragraph 181.

⁴ *Ibid*, paragraph 156.

Cambridgeshire & Peterborough Memorandum of Co-operation

What doesn't the Memorandum do?

In keeping with the principles of localism, this document respects the sovereignty of emerging Local Plans. Therefore, it does not set levels or locations for development or include prescriptive or directive policies.

What area does it cover?

The Memorandum focuses on the county of Cambridgeshire and the city of Peterborough. This area is covered by seven local authorities who worked together to create this document. These authorities are:

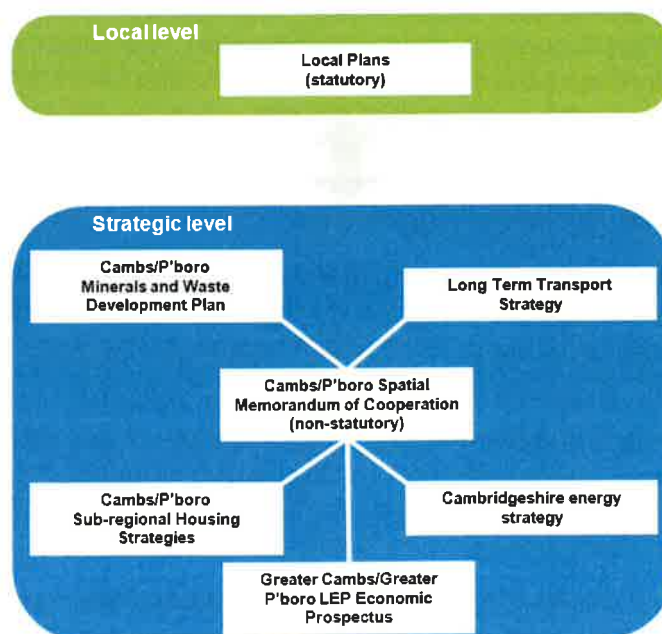
- Cambridge City Council
- Cambridgeshire County Council
- East Cambridgeshire District Council
- Fenland District Council
- Huntingdonshire District Council
- Peterborough City Council
- South Cambridgeshire District Council

However, in line with the NPPF, the Memorandum takes account of several different functional geographies which overlap the Cambridgeshire & Peterborough area. These include the Greater Cambridge Greater Peterborough Local Enterprise Partnership area, the respective Housing Market Areas for Cambridge and Peterborough, as well as the business planning areas covered by utilities providers and other stakeholders.

Who contributed to it?

The work has been developed alongside the LEP Economic Prospectus and the Cambridgeshire Long Term Transport Strategy. Figure 2 provides the context for the development of this strategic Memorandum.

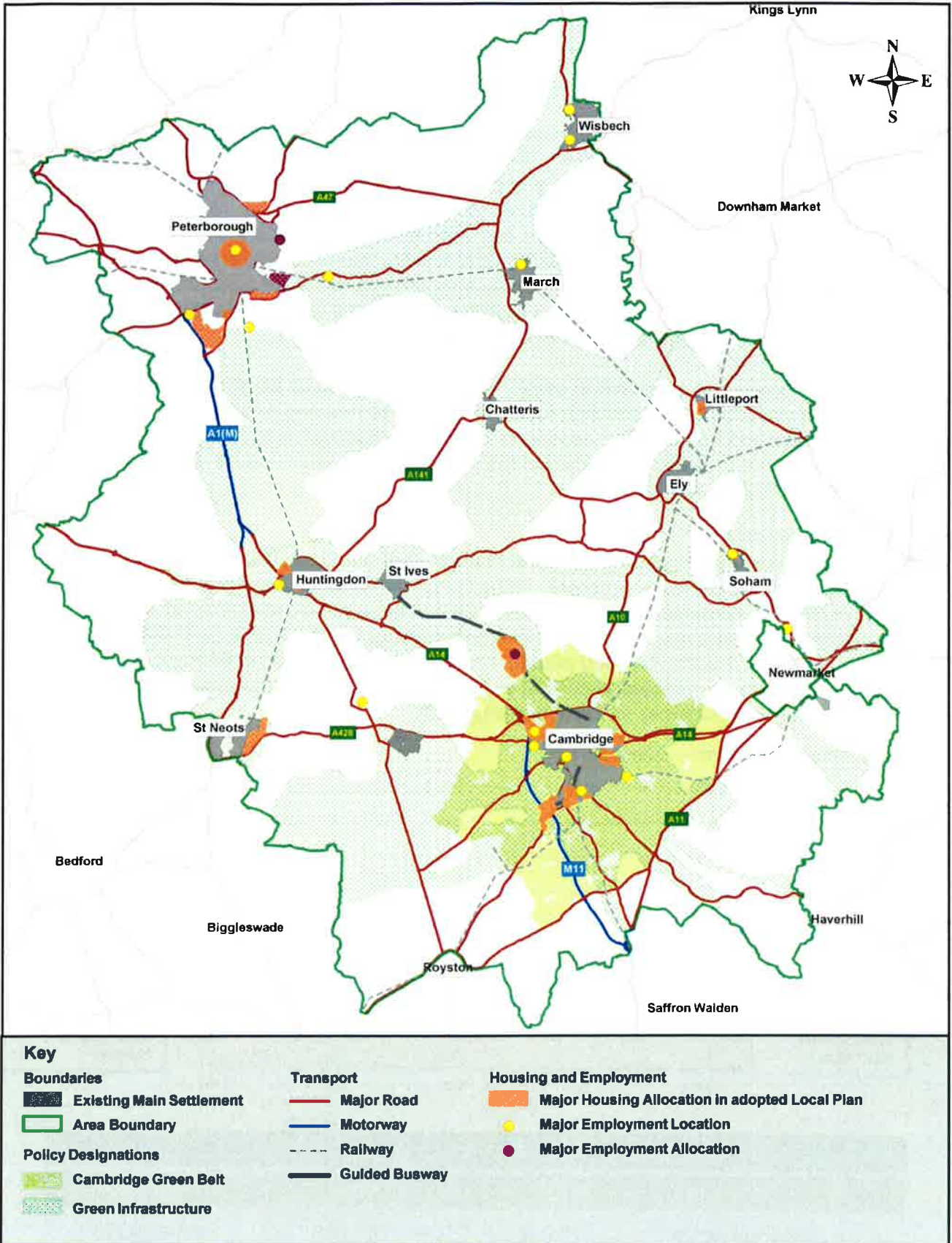
Figure 2: Context of strategic planning work



What time-period does it cover?

This document mirrors current Cambridgeshire & Peterborough Local Plan horizons, looking for the most part to 2031, although it accounts for Huntingdonshire District Council's Local Plan horizon of 2036.

Cambridgeshire & Peterborough in 2011



Scale (at A4) 1:400000

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How many jobs?

The two available economic models² that project jobs numbers 2011-31 predict different trends of jobs change as the economy responds to the current recession. However, they show a similar total increase 2011-31 in the number of jobs arising in Cambridgeshire and Peterborough (see Fig. 4). In terms of employment sectors, both models forecast strongest jobs growth in financial and business services, and jobs decline in manufacturing. These baseline forecasts don't include assumed jobs growth at Alconbury Enterprise Zone, which should result in a further 8,000 jobs. The conclusion that can be drawn is that the Cambridgeshire and Peterborough economies will continue to perform strongly in a regional and national context, despite on-going economic challenges.

Figure 4: Projected Jobs Growth 2011-31

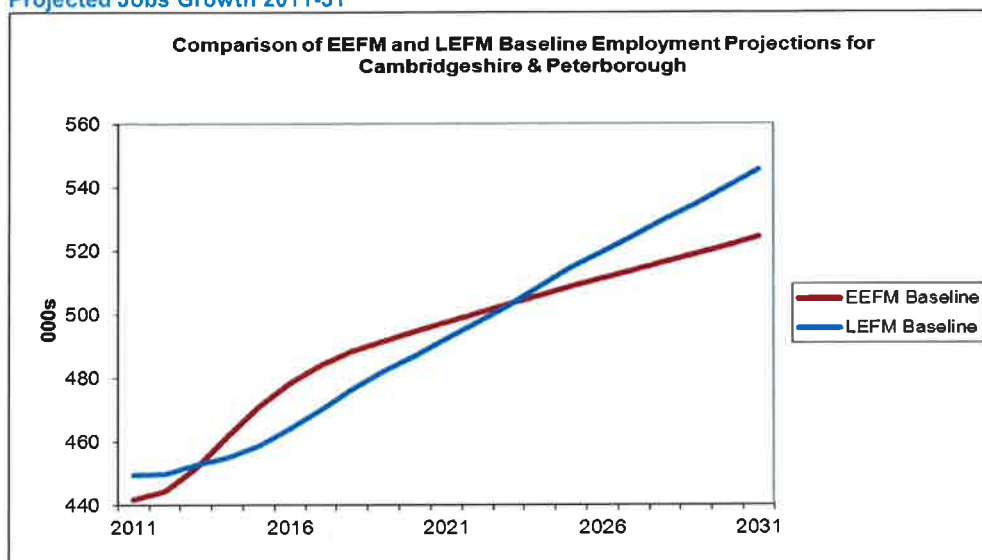


Table 2: Projected jobs growth 2011-31

Area	2011	2031	Increase
Cambridgeshire	325,000	396,000	71,000

How many homes?

The number of homes that are likely to be needed between 2011-31 is based upon our understanding of the jobs and people that will be in the area, as discussed above. These are derived from taking population figures at 2031 and applying assumed occupancy levels to achieve an indicative housing figure. The totals produced suggest that there will be a need 2011-31 for some 75,000 more homes in Cambridgeshire.

Table 3: Projected housing increase 2011-31

Area	2011	2031	Increase
Cambridgeshire	260,000	335,000	75,000

Peterborough

Peterborough's Local Development Framework, adopted in 2011, plans to provide 25,450 homes and 18,450 jobs between 2011 and 2026.

² The East of England Forecasting Model, Spring 2012 run (EEFM Baseline in Figure 4), and the Local Economy Forecasting Model spring 2012 run (LEFM Baseline in Figure 4).

Spatial Objectives

<p>Development and growth</p>	<p>Plan for an overall level of growth that will support the economic, social and environmental needs of the area and result in sustainable patterns of development. Growth will need to be supported by:</p> <ul style="list-style-type: none"> a) Making best use of existing transport and other infrastructure (including ICT) b) Future investment in transport and other necessary infrastructure to be provided by developer contributions and other identifiable resources. A strategic infrastructure plan will identify key priorities across the area together with likely sources of funding. <p>Transport investment will be focussed on facilitating sustainable modes of travel or improving essential access in growth areas to make optimum use of the resources likely to be available.</p>
<p>Housing</p>	<p>Provide for a level and quality of housing growth to support the economic prospects and aspirations of local areas, while contributing to sustainable patterns of development across Cambridgeshire and Peterborough and to the health and well-being of communities.</p> <p>Support the delivery of a high proportion of affordable homes, including homes of various sizes, types, tenures and costs to provide for the diversity of the area's housing and economic needs. The aim is to support the creation of mixed, balanced and cohesive communities.</p>
<p>Economic Development</p>	<p>Economic prosperity will be promoted throughout the area. New development will be encouraged that:</p> <ul style="list-style-type: none"> • supports the growth of a sustainable low carbon economy in Cambridgeshire and Peterborough; • strengthens Peterborough and Cambridge's environment clusters, and both areas' high technology and knowledge-based clusters; and • is in locations that improve the alignment between homes and jobs. <p>Sustainable economic regeneration will be encouraged, particularly in Peterborough city centre, northern Cambridgeshire (for example, in the Nene port area), the rural areas and the urban centres of market towns.</p>
<p>Transport</p>	<p>Sustainable transport opportunities will be required as a key component of new development.</p> <p>All growth and infrastructure investment is to be planned to minimise the need for unnecessary travel. Where travel and mobility is beneficial or essential, the use of public transport or cycling and walking is to be given priority.</p> <p>Home working, remote working and IT developments that reduce the need to travel are to be facilitated, including through Broadband.</p>

Spatial Approach

Background

The existing development strategy originated in the Cambridgeshire and Peterborough Structure Plan 2003 and with the support of all of the Cambridgeshire local authorities was incorporated in the East of England Plan (the Regional Spatial Strategy) published in 2008. These strategic plans informed the development of the City and District Councils' current Local Plan and Local Development Frameworks.

The key objective of the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development which increases unsustainable travel and restricts access to key services and facilities. Further sustainable locations for growth focus mainly on Cambridgeshire's market towns and Peterborough's city and district centres, with one large new town (Northstowe) to be connected to Cambridge and other key locations through a new dedicated public transport option, the Cambridgeshire Guided Busway.

Implementation of the strategy is on-going, with new urban extensions being delivered in Cambridge and Peterborough. Furthermore, the Busway is now operational and major developments, essential regeneration and infrastructure provision in Cambridgeshire's market towns continue to make positive progress.

The National Planning Policy Framework requires all local authorities to plan for sustainable development including planning positively for economic growth, with their local plans being prepared on the basis that objectively assessed development needs should be met. With the enactment of the Localism Act in 2011, all local authorities are now under a Duty to Co-operate in the preparation of their plans, both with each other and a range of other bodies.

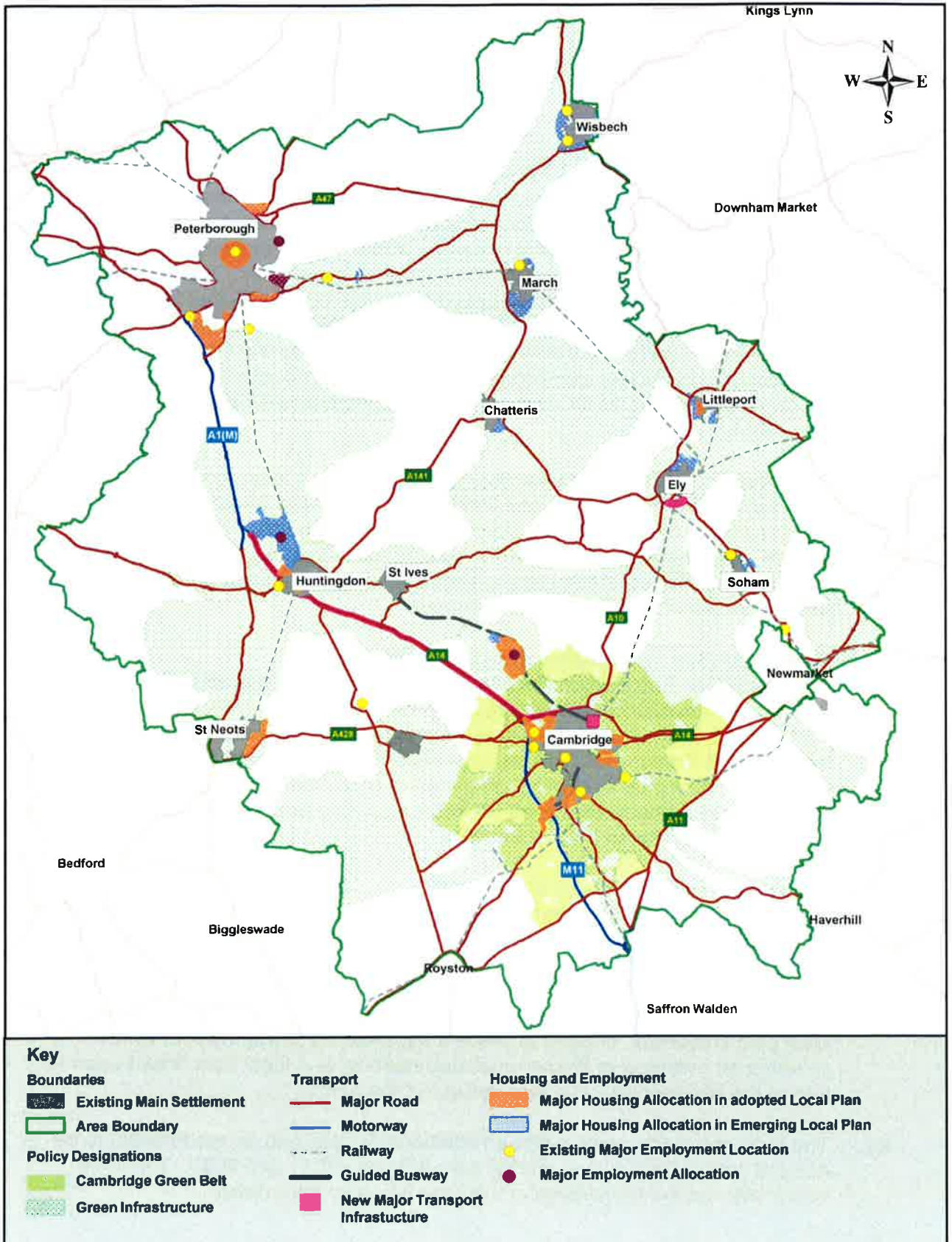
Updating the Spatial Approach

The Cambridgeshire authorities are currently undertaking a review or roll forward of their existing plans. The need for this work results from a range of factors, including fostering continued economic growth, providing sufficient housing and the need for delivery of the necessary infrastructure to support the development of sustainable communities. The review or roll forward of plans will also need to take account of the fundamental changes that are likely to impact on the existing strategy – for example, the current unavailability of Cambridge Airport for housing development or the introduction of the Enterprise Zone at Alconbury. Peterborough City Council is not reviewing its existing development plan documents as these were recently adopted and provide an up-to-date and challenging growth strategy to 2026.

In undertaking the review or roll forward of their plans, the local authorities are clear that fundamentally they will continue to be guided by the strategic principles which underpinned the original growth strategy, first set out in the 2003 Structure Plan. Locating homes in and close to urban areas and to other main centres of employment is critical to ensure appropriate, sustainable development.

An updated approach across the area is informed fundamentally by an understanding of how much development is necessary over the defined period and where it will be located. Collective work undertaken by the local authorities to understand future population levels and the development needs arising from this, estimates that some 75,000 homes and

Cambridgeshire & Peterborough towards 2031



Scale (at A4) 1:420000

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Cambridgeshire & Peterborough Memorandum of Co-operation

All dwelling change 2011 to 2031

District	All dwelling change 2011 to 2031
Cambridge	14,000
East Cambridgeshire	13,000
Fenland	12,000
Huntingdonshire	17,000 (21,000 to 2036)
South Cambridgeshire	19,000
Cambridgeshire	75,000
Forest Heath	7,000
St Edmundsbury	11,000
Housing sub-region	93,000

Source: Strategic Housing Market Assessment

- 3.3 In determining housing targets in their local plans, local authorities should take account of the requirements of national policy and local circumstances.
- 3.4 In this regard, it should be noted that the Peterborough housing market area overlaps into Cambridgeshire. Peterborough is the largest urban centre within the travel to work area for the Cambridgeshire sub-region and is a major employment location with good transport links and infrastructure. On the basis of currently available figures, it has a net daily in-commute from Cambridgeshire of around 7,000 people. Peterborough has an up to date Local Plan (Core Strategy adopted in 2011 and a Site Allocations DPD adopted in 2012) with a substantial housing growth target of 25,450 between 2009-26.
- 3.5 Based on this background and engagement between all the local authorities listed in section 2.0, under the Duty to Co-operate, it is acknowledged by the authorities that Peterborough, in its up to date Local Plan, has already accommodated a proportion of the housing need arising in the Cambridge Housing Market Area, and it has been agreed that this proportion could reasonably be assumed to amount to approximately 2,500 homes (i.e. around 10% of its overall housing target).
- 3.6 Separately, Fenland and East Cambridgeshire District Councils have made considerable progress to date with their local plan reviews and, therefore, have established a good understanding of their areas' development opportunities and constraints. They have also taken account of the July 2012 joint statement by Peterborough and the Cambridgeshire authorities which confirmed that the 'strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development'⁴.
- 3.7 Based on all of the above, and agreement between all the local authorities working within the Duty to Co-operate, it has been agreed that, in their Local Plans, provision should be made for 11,000 dwellings in Fenland and 11,500 dwellings in East Cambridgeshire, rather than the full identified need set out in the table above.
- 3.8 Overall, and taking account of the 2,500 dwelling element of the Cambridge HMA's need already met in Peterborough's Local Plan, this leaves 90,500

⁴ Joint Statement on the Development Strategy for Cambridgeshire and Peterborough by the local authorities, July 2012.

Joint Statement on the Development Strategy for Cambridgeshire and Peterborough by the local authorities¹

1.0 Introduction

- 1.1 In 2010 the Coalition Government announced its intention to abolish Regional Spatial Strategies (and by extension any 'saved' Structure Plan policies) and introduce a wholly locally-based planning system. In response to this changing policy environment the Cambridgeshire authorities issued a joint statement in autumn 2010 to set out their position in support of the existing, established development strategy for the County.
- 1.2 This statement updates and replaces that earlier one in the light of events since its publication in 2010. It is expanded to cover Peterborough in addition to Cambridgeshire, reflecting the history of joint working between the two areas, the shared objectives within the Local Enterprise Partnership, and the recent agreement to co-operate effectively and work together on strategic planning issues.

2.0 Background

- 2.1 The existing development strategy originated in the Cambridgeshire and Peterborough Structure Plan 2003 and with the support of all of the Cambridgeshire local authorities was incorporated in the East of England Plan (the Regional Spatial Strategy) published in 2008. These strategic plans informed the development of the City and District Councils' Local Plan and Local Development Frameworks, which currently are being implemented.
- 2.2 The key objective of the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development which increases unsustainable travel and restricts access to key services and facilities. Further sustainable locations for growth focus mainly on Cambridgeshire's market towns and Peterborough's district centres, with one large new town (Northstowe) to be connected to Cambridge and other key locations through a new dedicated public transport option, the Cambridgeshire Guided Busway.
- 2.3 Implementation of the strategy is on-going, with new urban extensions being delivered in Cambridge and Peterborough. With the Busway now up and running, significant development activity is underway in Cambridge's southern and north-west fringes and an application for a first phase for the new town of Northstowe has been submitted. Major developments, essential regeneration and infrastructure provision in Cambridgeshire's market towns continue to make positive progress.

3.0 National and Local Developments

- 3.1 The National Planning Policy Framework, published recently, requires all local authorities to plan for sustainable development including planning positively for economic growth, with their local plans being prepared on the basis that

¹ Cambridgeshire County Council, Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Peterborough City Council and South Cambridgeshire District Council.

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forms of evidence to both inform their plans and to shape the formulation of their strategies. Their work will be supported and constructively challenged at a strategic level by a newly-formed Joint Strategic Planning Unit. Close links to the Local Enterprise Partnership will also be further developed.

- 4.4 In undertaking the review or roll forward of their plans, the local authorities are clear that fundamentally they will continue to be guided by the strategic principles which underpinned the original growth strategy, first set out in the 2003 Structure Plan. Locating homes in and close to urban areas and to other main centres of employment is critical to ensure appropriate, sustainable development. It is essential, therefore, that the future development needs of the wider area are considered and agreed through a strategic plan-led approach, which takes account of identified local and national priorities.
- 4.5 Pending this review of the strategy, the local authorities are clear that they remain committed to delivering the existing planned strategy, and that significant capacity exists in terms of housing and employment land supply as we recover from the recession. During the transition period leading up to the introduction of their new, updated local plans, the local authorities will continue to give full weight to current, adopted planning policies.

July 2012

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ID: 578
Betterment Properties (Weymouth) Ltd
Appendix MDB4

Extracts from the report of David Hogger
To Purbeck District Council on its Local Plan EiP



The Planning
Inspectorate

Report to Purbeck District Council

by David Hogger BA MSc MRTPI MCIHT

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 31 October 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE PURBECK
LOCAL PLAN (PART 1)**

Document submitted for examination on 25 January 2012

Examination hearings held between 8 and 17 May 2012

File Ref: PINS/B1255/429/1

examination hearings and the site visits that I undertook, that I have identified nine main issues upon which the soundness of the Plan depends. A small number of other recommendations are made in order to ensure compliance between LP1 and the Framework and these are set out under 'Other Matters'.

Issue 1 – The overall provision for housing

National Planning Policy

13. The Framework establishes the presumption in favour of sustainable development and states that local planning authorities should positively seek to meet the development needs of their area. Local plans should meet objectively assessed needs unless any adverse impacts would significantly outweigh the benefits or there are policies in the Framework (for example relating to protected wildlife sites and the green belt) which indicate that development should be restricted. The objective should be to boost significantly the supply of housing.
14. There is also a requirement for local plans to reflect the national policy in favour of sustainable development. To this end a new policy is required in chapter 5 of LP1 to confirm the Council's positive approach towards sustainable development **[MM5]**, thus ensuring consistency with national policy.

The Housing Needs of South East Dorset

15. The Bournemouth and Poole housing market area includes Bournemouth, Poole, Christchurch, East Dorset and Purbeck. The forecast need for 2006-2026 is for about 38,950 dwellings². It is acknowledged that the plans for these local planning authorities are at various stages of preparation but currently there would be a potential supply of over 41,000 dwellings over the period. This indicates that the housing target is likely to be exceeded on a sub-regional basis and it has been confirmed by the other Councils referred to above that the conurbation can meet its own housing needs without strategic provision being made in Purbeck.

The District's Housing Needs

16. The Strategic Housing Market Assessment (SHMA)³ identifies a need for about 3,400 dwellings in the District between 2011 and 2031 (170 per annum). If population projections are used then the demand could be as high as 4,000 dwellings⁴ by 2026. The draft revised RS included a target of 5,150 dwellings for Purbeck but this included 2,750 at Lytchett Minster (the Western Sector). Over the same period LP1 allocates 2,400 dwellings (120 per annum), which is the same number as the revised RS proposed for elsewhere in Purbeck (i.e. excluding the Western Sector).

² Council's written answer to Inspector's question 4

³ 2012 Update - CD120a

⁴ Council Examination Statement PDC/4.1

17. The Council argues that there is currently insufficient evidence to demonstrate that significant additional housing (above the 120 dwellings/annum) could be accommodated within the District without harm to European protected sites. Higher housing numbers were assessed (e.g. 1,000 on the edge of Wool, 500 on the edge of Wareham and 500 on the edge of Lytchett Minster)⁵ but it was concluded that although there may be the potential to mitigate growth at Wool (in terms of heathland protection), there would only be limited opportunities elsewhere.
18. The Sustainability Appraisal⁶ (SA) acknowledges that future housing needs will not be met and implies that this is a consequence of the constraints imposed by European protected habitats and transport infrastructure. Therefore on the basis of the evidence available the Council concluded that a precautionary approach should be adopted and that LP1 should include a figure of 2,400 dwellings (increased to 2,520 to take the plan up to 2027) – a number which it was confident could be successfully implemented in tandem with heathland mitigation measures. The Council argues that there is currently insufficient certainty that a higher level of growth would not significantly harm protected habitats and species. In its view the potentially adverse effects of development on European protected sites outweigh the objective of meeting all the District's housing needs. In the circumstances at the time (based on the ecological evidence available) it was reasonable for the Council to conclude that there was no certainty that a target of 170 dwellings a year could be achieved without harm to ecological interests and that the identification of a target of 120 dwellings per year was therefore justified. However, it is clear that more recent detailed analysis gives reasonable confidence that in some locations appropriate heathland mitigation measures could be provided.

Housing and Heathland Protection

19. Significant progress has been made (primarily by land owners) on the identification of sites for the provision of mitigation measures and the evidence demonstrates that there is the potential to accommodate such measures on a number of sites in the District (in the form of Suitable Alternative Natural Greenspace – SANGs). Further detailed assessment is required to enable confident conclusions to be drawn with regard to the contribution such sites can make to mitigating the impact of residential development but a number of reasonable opportunities appear to be available. The Framework encourages local planning authorities to be aspirational and to seek opportunities to deliver sustainable development. Current evidence indicates that the District could accommodate a higher level of growth than is currently being proposed by the Council (accompanied by appropriate mitigation measures) and hence its housing needs could be met more fully.
20. In terms of the housing allocations in LP1 and other potential residential development, reference to protecting ecological assets and the provision of mitigation measures (in the form of SANGs) is required in order to ensure that sites of ecological importance are afforded the appropriate protection. Therefore modifications **MM14 - part** (north west Purbeck), **MM17** (south west Purbeck); **MM20** (central Purbeck); **MM28** (north east Purbeck); **MM35**

⁵ HRA Implications of Additional Growth Scenarios for European Protected Sites – CD112

⁶ SD15

and **MM38** (south east Purbeck); and **MM52** (overarching policy advice relating to new development in the District as a whole) are necessary to strengthen the protection afforded to such sites in accordance with national policy.

South East Dorset Green Belt

21. A review of the green belt has been undertaken by the Council⁷ and was subject to a number of public consultation exercises. However, paragraph 85 of the Framework advises that 'safeguarded land' should where necessary be identified between urban areas and the green belt in order to meet longer term development needs. Bearing in mind the other significant constraints that exist in the District and the need for local planning authorities to positively seek opportunities to meet the development needs of their area, such an approach would be appropriate in Purbeck but it has not been adopted by the Council.
22. Land to the north of the allocated site in Lytchett Matravers is referred to by the Council, in its Statement on Matter 2, as having the potential to accommodate future settlement expansion and there is no reason to conclude that this and other appropriate 'safeguarded land' could not be specifically identified. Green belt boundaries should only be altered in exceptional circumstances but the local planning authority must be satisfied that the boundaries will not need to be altered at the end of the plan period and the evidence indicates that currently such certainty cannot be assured. It is therefore recommended that the green belt boundary and in particular the identification of 'safeguarded land' for future growth, be considered as soon as practicable [**MM2**]. This is an essential change in order that LP1 is justified, effective and consistent with national policy.
23. The land at Holton Heath and Sandford that it is proposed by the Council to add to the green belt was considered by the Inspector for the Purbeck District Local Plan⁸. He concluded that although the areas 'are no doubt capable of contributing to the Green Belt purposes' he could not recommend their inclusion because the test requires that the assumption that led to the land being initially excluded from the green belt has been 'clearly and permanently falsified by a later event'⁹. At that time the Structure Plan continued to identify the area as a strategic location for development. That allocation has now been abandoned and consequently this 'later event', which is exceptional in its nature, has occurred and provides the justification for the extension of the green belt at Sandford and Holton Heath.
24. Objection was raised to the inclusion of land in the vicinity of Worgret Road (to the west of Wareham) in the green belt. This is part of a re-alignment of the western boundary of the green belt, which is currently poorly defined on the ground and which has been artificially tied to administrative boundaries. The Framework states that boundaries should be clearly defined using physical features that are readily recognisable and likely to be permanent. The Council has followed this advice by proposing a boundary that follows specific features on the ground. The exceptional circumstances required to alter a green belt

⁷ CD127

⁸ Inspector's Report 2002

⁹ COPAS v the Royal Borough of Windsor and Maidenhead (2001)

boundary therefore exist and the Council's approach is sound.

Conclusion on Issue 1

25. *Paragraph 14 of the Framework specifically states that objectively assessed needs should be met unless any adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate that development should be restricted. Paragraph 152 advises that significant adverse impact on the environmental dimension of sustainable development (i.e. biodiversity) should be avoided and options which reduce or eliminate such impacts should be pursued. It is also reasonable to apply the principle in paragraph 118 (first bullet point) which advises that if significant harm cannot be adequately mitigated planning permission should be refused.*
26. *Against this background the Council's precautionary approach to the allocation of housing sites is currently justified because of the uncertainty regarding the effect of development on European Nature Conservation sites. However, it has not been conclusively demonstrated that the most appropriate strategy is being promoted by the Council, particularly for the medium to longer term in the plan period. It is clear that there may now be reasonable opportunities available for the provision of heathland mitigation measures, particularly in the medium term, and the Council acknowledge this to be the case.*
27. *I have given very careful consideration to the situation. On the one hand LP1 does not allocate sufficient land for housing but on the other hand further detailed work is required to confirm the suitability of a number of potential heathland mitigation sites. I must also take into account the fact that the proposed settlement extensions would make a significant contribution to housing supply in the short term (including affordable housing). Circumstances are similar to those surrounding the Purbeck Local Plan Final Edition (2004) which was never statutorily adopted because the implementation of a strategic housing allocation at Holton Heath and the provision of the Sandford by-pass could not be satisfactorily achieved without significant harm to nature conservation interests, thus creating what has been described as a policy vacuum.*
28. *The Council currently has no adopted policies in place and if LP1 is not adopted there is the risk of 'planning by appeal' and the loss of public confidence in, and support for, the process. This cannot be in the best interests of the local community especially bearing in mind that the Framework promotes the need to strengthen local decision making and reinforces the importance of up-to-date plans. I am also mindful that there is the potential for a significant level of development to be allocated at Crossways (on the boundary with Purbeck) by West Dorset District Council, in the West Dorset, Weymouth and Portland Local Plan. Also Poole Borough Council is proposing to review its Core Strategy in 2013. The duty to co-operate, together with the timing of these various documents will ensure that cross boundary issues can be more thoroughly addressed.*
29. *A majority of the policies in LP1 would endure throughout the remaining 15 years of the plan period and in the short term LP1 would provide an appropriate framework for housing development in the District (see paragraph 35). It is particularly in the medium to long term that the Council should be*

seeking to allocate further land to meet more fully its housing needs.

30. *It has been suggested that rather than progressing with the adoption of the submitted Local Plan, the Council should divert its resources to an immediate review of the document, thus ensuring that the review would be adopted prior to the currently anticipated date of 2017. There are arguments both ways but I consider that the objectives of the Framework are best achieved in the short term by the adoption of the current document (as proposed to be modified), which is programmed for later this year. If the plan was withdrawn for further work to be undertaken by the Council the policy vacuum in the District would remain which would be contrary to the objective of achieving local plan coverage across the country as soon as possible and it is not clear that much time would be saved by taking this approach, bearing in mind work on the review will start in earnest next year. In these exceptional circumstances I consider that the adoption of LP1 as a short term measure is the most appropriate way forward and that the Council's approach is justified.*
31. *It is recommended that a section is included in LP1 entitled 'Future Partial Review' [MM2]. This commits the Council to a partial review of the plan to commence in 2013 (with adoption in 2017)¹⁰ and refers to achieving a target of 170 dwellings per annum. Among the issues to be addressed in the review will be additional settlement extensions to contribute to meeting housing needs and a review of the green belt including the potential for safeguarded land. This will enable the Council to consider in detail and resolve heathland mitigation measures and also to co-operate with West Dorset District Council with respect to potential development at Crossways. It is also recommended that a new paragraph be inserted in the supporting text in order to add detail to the Council's approach [MM8].*
32. *The Council will not be able to rely on these reasons for delay in three years time. This is a short term expedient approach and because the District will continue to be under pressure for additional housing (a need that is likely to increase) it is imperative that the early review is undertaken. If there was any evidence that this could not be achieved then LP1 would not be sound. On the basis that the review of LP1 will commence in 2013, the plan can currently be considered to be sound. This approach should not be seen as a template for others to follow, it is only justified because of the exceptional circumstances which currently exist in this District.*
33. *With the Modifications proposed LP1 makes sound provision for housing in the short term and includes the mechanism by which housing supply, particularly in the medium to longer term, can be boosted.*
34. *It is against the background of an imminent review of the local plan that the remainder of this report should be read.*

¹⁰ See 'Response to Queries Raised by the Inspector after Completion of the May 2012 Hearing Sessions'

Matter 1
ID: 578
Betterment Properties (Weymouth) Ltd
Appendix MDB3
Cambridgeshire & Peterborough
Memorandum of Co-operation

Cambridgeshire & Peterborough Memorandum of Co-operation

Supporting the Spatial Approach 2011-2031



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Introduction: What is the Cambridgeshire & Peterborough Memorandum of Co-operation?

Why was it produced?

The Cambridgeshire & Peterborough Memorandum of Co-operation has been produced by the local authorities to support the development of a coherent and comprehensive growth strategy across Cambridgeshire & Peterborough. It has been developed in response to the removal of the statutory strategic planning tier¹.

This Memorandum builds upon a strong legacy of the local authorities working together, most notably in producing the Cambridgeshire & Peterborough Structure Plan 2003, which first set out the current spatial strategy for the wider area, and continuing through the East of England Plan and joint development strategy statements published in 2010 and 2012 (the 2012 Joint Statement is included as an appendix to this document).

What does it do?

The Memorandum aims to contribute to the achievement of sustainable development in Cambridgeshire & Peterborough, in accordance with the National Planning Policy Framework (NPPF). Delivering sustainable development necessitates the local authorities actively working together across boundaries to “meet the development needs of their area”². This collaborative approach is enshrined in the duty to co-operate included in the Localism Act 2011. Appendix 1 reflects the outcomes of co-operation across the wider housing market area to establish the levels of provision for additional housing.

Recognising the primary role that individual local authorities have in addressing the duty to co-operate through their statutory Local Plans, the overarching aim of the Memorandum is to provide *additional* evidence that the duty has been addressed. It does this by demonstrating that the emerging district-level development strategies contribute to an area-wide strategic vision, objectives and spatial strategy, and by addressing strategic spatial planning issues across the area. In this sense it fulfils the role envisaged for jointly-prepared, non-statutory documents in the NPPF³.

What topics does it cover?

The Memorandum sets out the vision and objectives for the long-term development of the area, an overview of the evidence for future levels of growth, and the broad spatial approach that will help realise the vision and the area’s growth needs. These issues form this first part of the Memorandum, published in Spring 2013 to support the submission of Local Plans.

Additionally, a second part will address the main strategic planning priorities identified in the NPPF⁴ (see Figure 1 below). To ensure that the Memorandum is truly strategic, and therefore complementary to the emerging Local Plans, issues arising under each priority have been tested to assess whether they meet the principle of “greater than local”; that is, whether the issue affects more than one district. This second part of the Memorandum will be available later in 2013.

¹ The East of England Plan was revoked in January 2013.

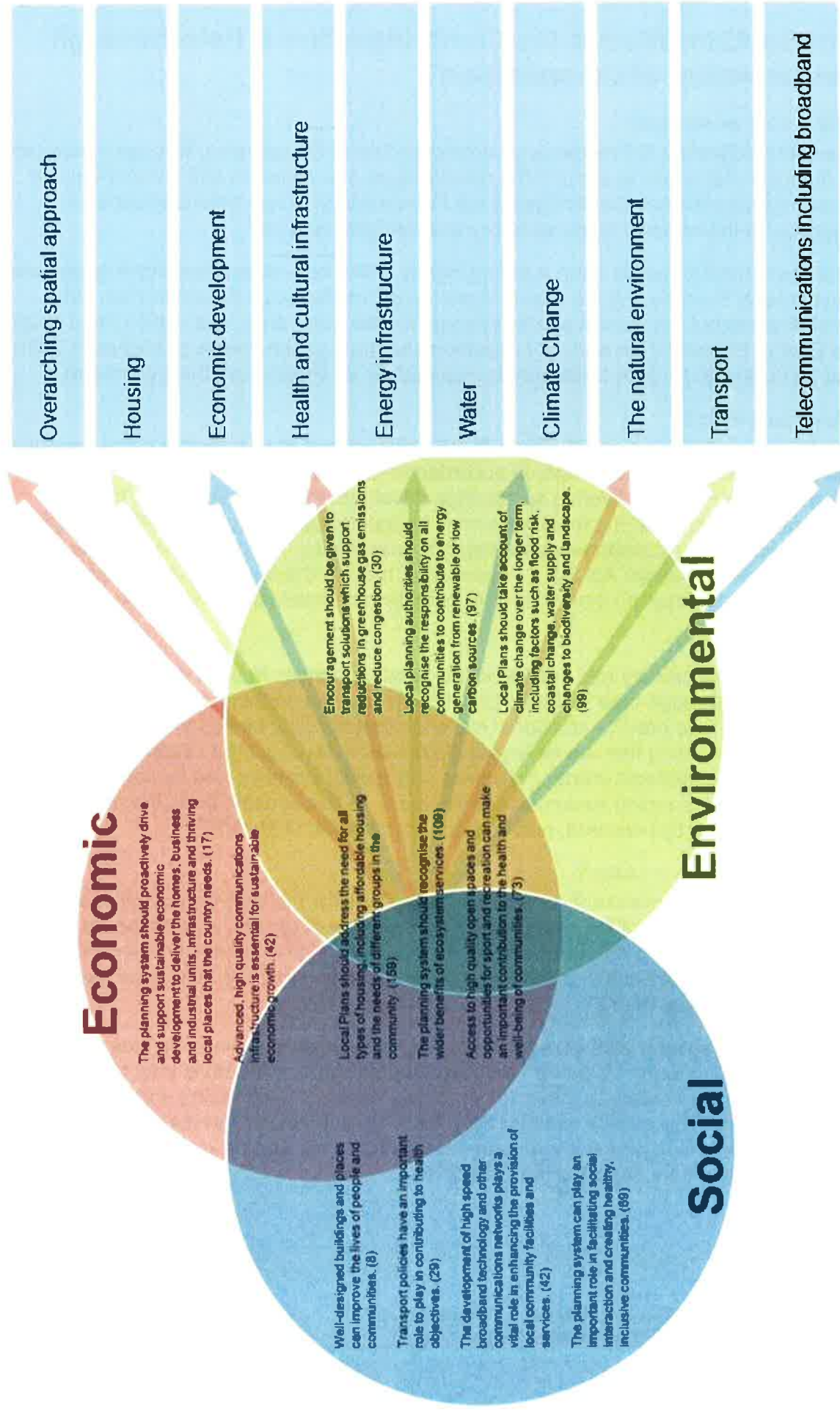
² *National Planning Policy Framework*, paragraph 14.

³ *Ibid*, paragraph 181.

⁴ *Ibid*, paragraph 156.

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Figure 1: Strategic priorities and the dimensions of sustainable development



Cambridgeshire & Peterborough Memorandum of Co-operation

What doesn't the Memorandum do?

In keeping with the principles of localism, this document respects the sovereignty of emerging Local Plans. Therefore, it does not set levels or locations for development or include prescriptive or directive policies.

What area does it cover?

The Memorandum focuses on the county of Cambridgeshire and the city of Peterborough. This area is covered by seven local authorities who worked together to create this document. These authorities are:

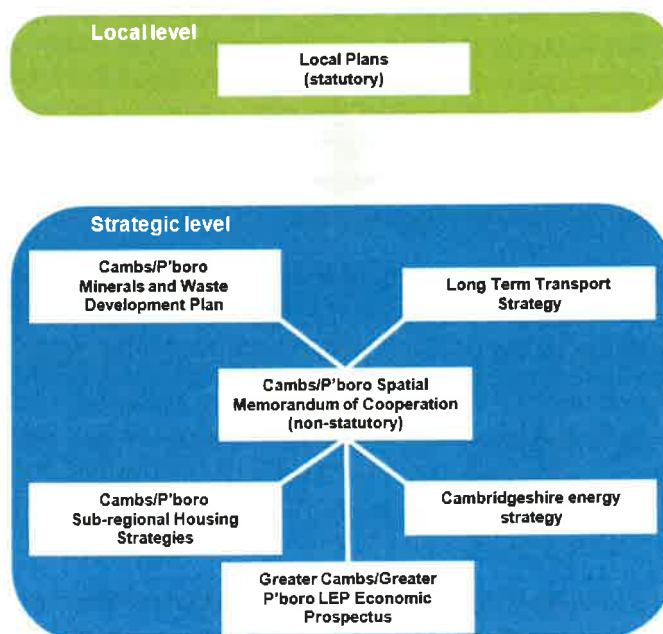
- Cambridge City Council
- Cambridgeshire County Council
- East Cambridgeshire District Council
- Fenland District Council
- Huntingdonshire District Council
- Peterborough City Council
- South Cambridgeshire District Council

However, in line with the NPPF, the Memorandum takes account of several different functional geographies which overlap the Cambridgeshire & Peterborough area. These include the Greater Cambridge Greater Peterborough Local Enterprise Partnership area, the respective Housing Market Areas for Cambridge and Peterborough, as well as the business planning areas covered by utilities providers and other stakeholders.

Who contributed to it?

The work has been developed alongside the LEP Economic Prospectus and the Cambridgeshire Long Term Transport Strategy. Figure 2 provides the context for the development of this strategic Memorandum.

Figure 2: Context of strategic planning work



What time-period does it cover?

This document mirrors current Cambridgeshire & Peterborough Local Plan horizons, looking for the most part to 2031, although it accounts for Huntingdonshire District Council's Local Plan horizon of 2036.

Spatial Portrait

The area covered by this Memorandum contains two cities, Cambridge and Peterborough, together with a number of market towns and numerous villages.

Cambridge is at the heart of a city region of international importance and reputation. It includes a world-class university, a strong knowledge-based economy and a built and natural environment that is second to none. Peterborough has a wide sphere of influence based around its diverse economy, good strategic road and rail links and is gaining momentum towards realising its ambition of being national 'environment capital'.

The area's economy has, as a whole, historically outperformed the national and regional economy and this continues to be the case, despite the challenges brought about by recession. However, economic prosperity is not spread evenly.

Many of the market towns in the south, including Huntingdon, St Neots and Ely, look to the Cambridge economy and services, although they continue to develop and strengthen their own local economies, retail and service offers. To the north there is a stronger relationship between places such as Ramsey and Whittlesey with Peterborough, while Wisbech is closer to King's Lynn.

The area contains a diverse range of natural environments. The Ouse and Nene Washes are of international importance for wildfowl and migratory birds, whilst low-lying fenland areas provide unique landscapes. Significant new and expanded habitat and green-space creation is a major objective for the area. Strategic examples include the award-winning Great Fen and Wicken Fen.

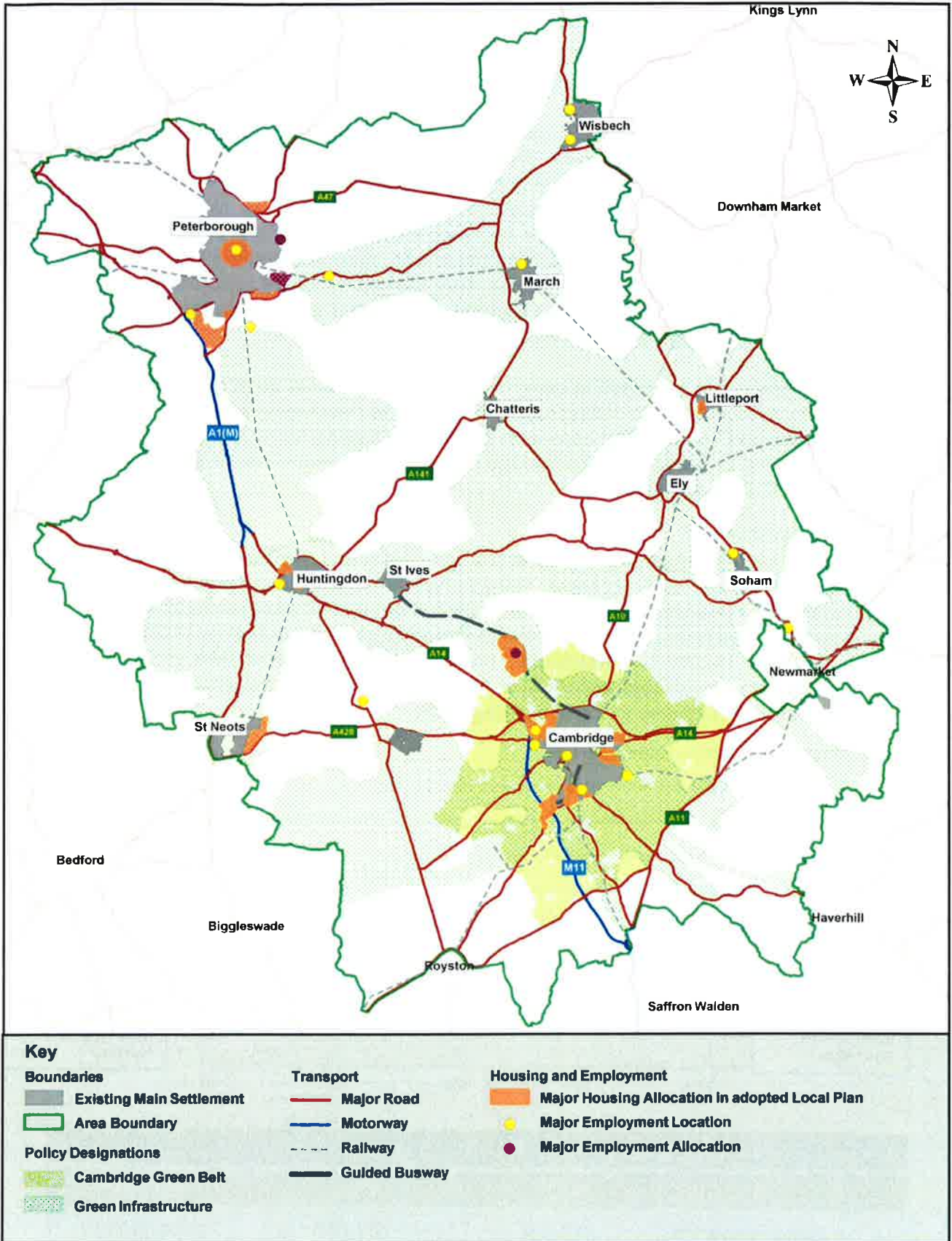
The area's economic strengths and related population growth have led to significant and continued pressure for growth over recent times. The development strategy established in the 2003 Structure Plan is currently being implemented, with major urban extensions and the new town of Northstowe coming forward. Cambridge University is planning a strategic expansion area to the north-west of the city, while the Addenbrookes biomedical campus has enhanced the institution's international reputation. Peterborough continues to implement a significant growth strategy through urban extensions, development at district centres and major city centre regeneration.

Housing affordability is acute in many parts of the strategic area, particularly to the south focused on Cambridge. It remains an important objective for the authorities to maximise affordable housing provision to support the social and economic well-being of the area and local communities.

The strategic road network is extremely busy and a number of key routes suffer congestion at peak times, particularly as a result of out-commuting from parts of the area. This reflects a need to create sustainable patterns of development, including access to public transport and a balance of jobs and homes.

The local authorities are working with government to address the current capacity challenges on the A14. There have been some successes in public transport, with the opening of the Cambridgeshire Guided Busway, Peterborough's TravelChoice Initiative, and increased use of park and ride services. However, public transport services and use vary across the county. In rural areas, bus services tend to be less frequent with longer journey times, therefore these areas often rely on the private car for transport. The area is well served by the strategic rail network, with the East Coast Main Line, Fen Line and others providing links to London, Ipswich, Norwich and further afield. Recent years have seen an increase in rail patronage.

Cambridgeshire & Peterborough in 2011



Scale (at A4) 1:400000

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Economic and Demographic Framework: estimating development needs in the future

Evidence sources

Government policy requires local planning authorities to provide for the homes that the local population will need in the future. The principal sources of evidence for estimating how many people and jobs there will be in the future, and therefore how many homes will be needed, are demographic and economic projections and forecasts. No model can predict the future with absolute accuracy, but such forecasts provide the best estimate of future change using the data available. The Cambridgeshire authorities have considered housing demand across the Housing Market Area using a variety of national, sub-national and local models. The outputs from these, together with a wide range of other factors, are reflected in the Strategic Housing Market Assessment.

A robust yet pragmatic approach to using these projections must be applied, recognizing the inherent uncertainty in predicting future trends, while needing to plan for a particular number of jobs and houses. The approach taken to assessing housing need and demand is set out in detail in the Cambridge sub-region Strategic Housing Market Assessment 2012, chapter 12.¹

How many people?

Population growth is comprised of natural change (births and deaths) and migration (people moving in and out of an area). The assessment of population growth that has been undertaken takes account of economically-led population projections as well as demographically-led ones. Analysis of these projections suggests that 2011-31 there will be an increase of roughly 144,000 people in Cambridgeshire. Around 84% of this population growth is projected to consist of in-migration, a sign of the area's economic strengths and attractiveness to those seeking work.

Figure 3: Projected population change 2011-31

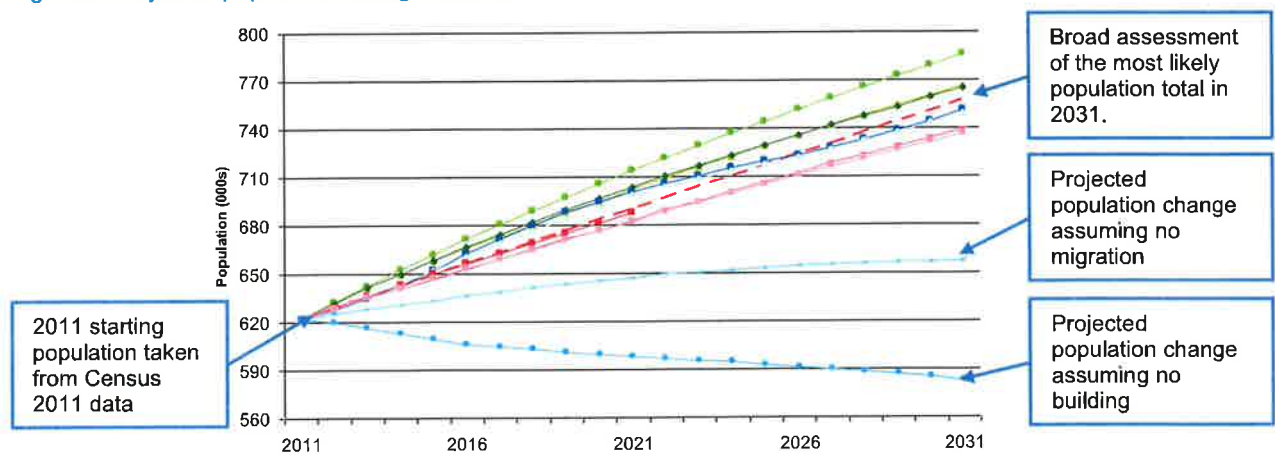


Table 1: Projected population change 2011-31

Area	2011	2031	Increase
Cambridgeshire	623,000	767,000	144,000

¹ Visit www.cambridgeshireinsight.org.uk/housing to view the Cambridge sub-region SHMA.

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How many jobs?

The two available economic models² that project jobs numbers 2011-31 predict different trends of jobs change as the economy responds to the current recession. However, they show a similar total increase 2011-31 in the number of jobs arising in Cambridgeshire and Peterborough (see Fig. 4). In terms of employment sectors, both models forecast strongest jobs growth in financial and business services, and jobs decline in manufacturing. These baseline forecasts don't include assumed jobs growth at Alconbury Enterprise Zone, which should result in a further 8,000 jobs. The conclusion that can be drawn is that the Cambridgeshire and Peterborough economies will continue to perform strongly in a regional and national context, despite on-going economic challenges.

Figure 4: Projected Jobs Growth 2011-31

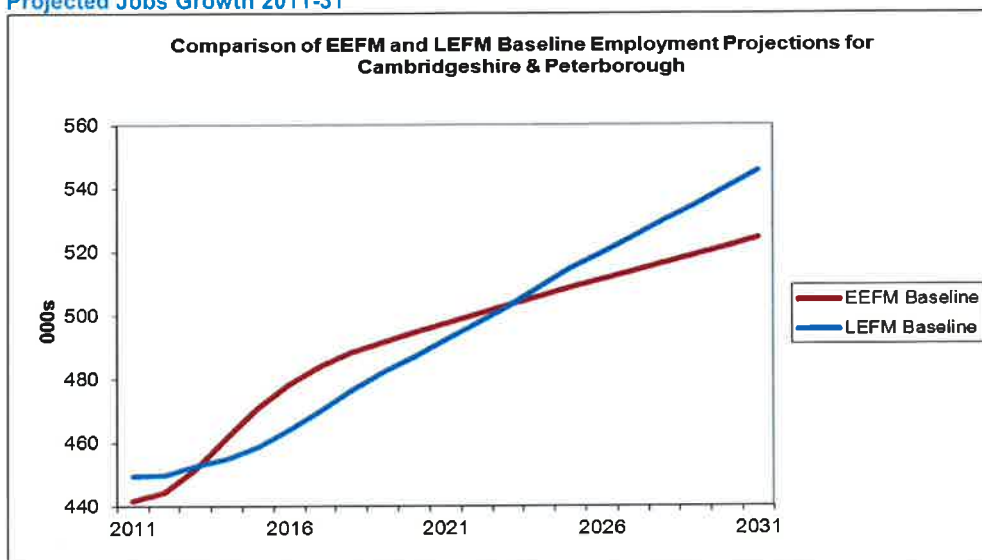


Table 2: Projected jobs growth 2011-31

Area	2011	2031	Increase
Cambridgeshire	325,000	396,000	71,000

How many homes?

The number of homes that are likely to be needed between 2011-31 is based upon our understanding of the jobs and people that will be in the area, as discussed above. These are derived from taking population figures at 2031 and applying assumed occupancy levels to achieve an indicative housing figure. The totals produced suggest that there will be a need 2011-31 for some 75,000 more homes in Cambridgeshire.

Table 3: Projected housing increase 2011-31

Area	2011	2031	Increase
Cambridgeshire	260,000	335,000	75,000

Peterborough

Peterborough's Local Development Framework, adopted in 2011, plans to provide 25,450 homes and 18,450 jobs between 2011 and 2026.

² The East of England Forecasting Model, Spring 2012 run (EEFM Baseline in Figure 4), and the Local Economy Forecasting Model spring 2012 run (LEFM Baseline in Figure 4).

Spatial Vision

By 2031 Cambridgeshire and Peterborough will:

Offer attractive homes, jobs and a high quality of life in a range of distinctive urban and rural communities. This will provide opportunities for all residents and workers to achieve their maximum potential, and will facilitate healthy and sustainable lifestyles.

Have grown sustainably by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, including through planned urban extensions, and along key dedicated public transport routes, while avoiding dispersed or isolated new development which can increase unsustainable travel and restrict access to key services and facilities.

Be acknowledged as a world leader in innovation, new technologies, and knowledge-based business and research: yet more diverse in its economy across the area; including the expansion of appropriate-scale manufacturing and low carbon technologies, within and close to the main urban areas and at the Enterprise Zone at Alconbury.

Support the educational attainment and skills needed to realise the area's economic potential, via improved provision for further and higher education. In particular, the universities in Cambridge and Peterborough will have maintained and enhanced their reputations at national and international level as providers of high quality education and training.

Benefit from integrated transport networks, including being served by frequent high quality public transport within and between Cambridge, Peterborough and the market towns and district centres. There will be a closer relationship of homes to jobs and services, access to high quality routes for cycling and walking and good links to the countryside. A new station to the north of Cambridge and an enhanced east coast mainline will increase public transport accessibility, including to London.

Be an exemplar of low carbon living, efficient use of resources, sustainable development and green infrastructure; founded on Peterborough's eco-cluster and environment capital aspirations, Cambridge's emerging clean-tech cluster, the retention of Cambridge as a compact city, the development of Northstowe and the sustainable expansion of market towns and district centres with close links to village communities.

Be outstanding in the conservation and enhancement of its urban, rural and historic environment including vibrant city centres, attractive market towns, spacious fen landscapes, river valleys and a high degree of biodiversity.

Be well prepared for the impact of climate change and highly adapted to its effects, especially in the extensive low lying areas.

Spatial Objectives

<p>Development and growth</p>	<p>Plan for an overall level of growth that will support the economic, social and environmental needs of the area and result in sustainable patterns of development. Growth will need to be supported by:</p> <ul style="list-style-type: none"> a) Making best use of existing transport and other infrastructure (including ICT) b) Future investment in transport and other necessary infrastructure to be provided by developer contributions and other identifiable resources. A strategic infrastructure plan will identify key priorities across the area together with likely sources of funding. <p>Transport investment will be focussed on facilitating sustainable modes of travel or improving essential access in growth areas to make optimum use of the resources likely to be available.</p>
<p>Housing</p>	<p>Provide for a level and quality of housing growth to support the economic prospects and aspirations of local areas, while contributing to sustainable patterns of development across Cambridgeshire and Peterborough and to the health and well-being of communities.</p> <p>Support the delivery of a high proportion of affordable homes, including homes of various sizes, types, tenures and costs to provide for the diversity of the area's housing and economic needs. The aim is to support the creation of mixed, balanced and cohesive communities.</p>
<p>Economic Development</p>	<p>Economic prosperity will be promoted throughout the area. New development will be encouraged that:</p> <ul style="list-style-type: none"> • supports the growth of a sustainable low carbon economy in Cambridgeshire and Peterborough; • strengthens Peterborough and Cambridge's environment clusters, and both areas' high technology and knowledge-based clusters; and • is in locations that improve the alignment between homes and jobs. <p>Sustainable economic regeneration will be encouraged, particularly in Peterborough city centre, northern Cambridgeshire (for example, in the Nene port area), the rural areas and the urban centres of market towns.</p>
<p>Transport</p>	<p>Sustainable transport opportunities will be required as a key component of new development.</p> <p>All growth and infrastructure investment is to be planned to minimise the need for unnecessary travel. Where travel and mobility is beneficial or essential, the use of public transport or cycling and walking is to be given priority.</p> <p>Home working, remote working and IT developments that reduce the need to travel are to be facilitated, including through Broadband.</p>

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<p>Other infrastructure</p>	<p>The Connecting Cambridgeshire project (including Peterborough) will support economic growth and reduce the digital divide by providing superfast broadband access to at least 90% of existing premises, and better broadband to the rest, by 2015.</p> <p>Take a coordinated and forward-looking approach to energy, including generation, distribution and use. Renewable energy opportunities will be proactively identified and delivered. New development will achieve high energy efficiency standards, and opportunities for on-site energy generation will be considered where relevant</p>
<p>Water</p>	<p>Take a co-ordinated approach to water through water cycle studies to address water supply, quality, wastewater treatment and flood risk. High standards of water efficiency should be achieved in new development and flood risk assessments should be used effectively to ensure development is located appropriately.</p>
<p>Community and cultural infrastructure</p>	<p>Development should promote opportunities for a high quality of community life, including access to work opportunities, community facilities, safe walkable streets and a network of open spaces and green infrastructure.</p> <p>Cultural diversity, recreation and the arts are an integral part of existing and new communities and relevant facilities should be provided through new development.</p> <p>Priority will be given to regeneration and renewal in disadvantaged or declining communities.</p> <p>Community involvement will be essential to the design and implementation of all new communities and major developments.</p>
<p>Climate Change</p>	<p>Ensure that the overriding need to meet the challenge of climate change is recognised through the location and design of new development, ensuring that it is designed and constructed to take account of the current and predicted future effects of climate change. This includes achieving the highest possible standards in reducing CO₂ emissions in the built environment and transport choices.</p>
<p>The Natural Environment</p>	<p>To conserve and enhance the environment of Cambridgeshire and Peterborough in relation to:</p> <ul style="list-style-type: none"> • landscape and water resources (including the Cam, the Great Ouse and Nene and associated Washes) • habitats and species (biodiversity) • public access to and enjoyment of the County's environmental assets in urban and rural areas (green infrastructure) • minimising waste and pollution.

Spatial Approach

Background

The existing development strategy originated in the Cambridgeshire and Peterborough Structure Plan 2003 and with the support of all of the Cambridgeshire local authorities was incorporated in the East of England Plan (the Regional Spatial Strategy) published in 2008. These strategic plans informed the development of the City and District Councils' current Local Plan and Local Development Frameworks.

The key objective of the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development which increases unsustainable travel and restricts access to key services and facilities. Further sustainable locations for growth focus mainly on Cambridgeshire's market towns and Peterborough's city and district centres, with one large new town (Northstowe) to be connected to Cambridge and other key locations through a new dedicated public transport option, the Cambridgeshire Guided Busway.

Implementation of the strategy is on-going, with new urban extensions being delivered in Cambridge and Peterborough. Furthermore, the Busway is now operational and major developments, essential regeneration and infrastructure provision in Cambridgeshire's market towns continue to make positive progress.

The National Planning Policy Framework requires all local authorities to plan for sustainable development including planning positively for economic growth, with their local plans being prepared on the basis that objectively assessed development needs should be met. With the enactment of the Localism Act in 2011, all local authorities are now under a Duty to Co-operate in the preparation of their plans, both with each other and a range of other bodies.

Updating the Spatial Approach

The Cambridgeshire authorities are currently undertaking a review or roll forward of their existing plans. The need for this work results from a range of factors, including fostering continued economic growth, providing sufficient housing and the need for delivery of the necessary infrastructure to support the development of sustainable communities. The review or roll forward of plans will also need to take account of the fundamental changes that are likely to impact on the existing strategy – for example, the current unavailability of Cambridge Airport for housing development or the introduction of the Enterprise Zone at Alconbury. Peterborough City Council is not reviewing its existing development plan documents as these were recently adopted and provide an up-to-date and challenging growth strategy to 2026.

In undertaking the review or roll forward of their plans, the local authorities are clear that fundamentally they will continue to be guided by the strategic principles which underpinned the original growth strategy, first set out in the 2003 Structure Plan. Locating homes in and close to urban areas and to other main centres of employment is critical to ensure appropriate, sustainable development.

An updated approach across the area is informed fundamentally by an understanding of how much development is necessary over the defined period and where it will be located. Collective work undertaken by the local authorities to understand future population levels and the development needs arising from this, estimates that some 75,000 homes and

Cambridgeshire & Peterborough Memorandum of Co-operation

71,000 jobs will need to be accommodated across Cambridgeshire by 2031. Peterborough is not reviewing its current plans and continues to address the challenging growth targets in its existing Core Strategy of 25,450 additional homes and 18,450 jobs by 2026.

Sustainable and deliverable locations and allocations in existing plans are likely to make up a significant proportion of the identified need for future land for homes and jobs. This is particularly the case where authorities have adopted core strategies or plans which have relatively long end dates. These existing allocations are founded on the principles of the existing overarching strategy and include development within and as major extensions to urban areas, and the planned new town of Northstowe.

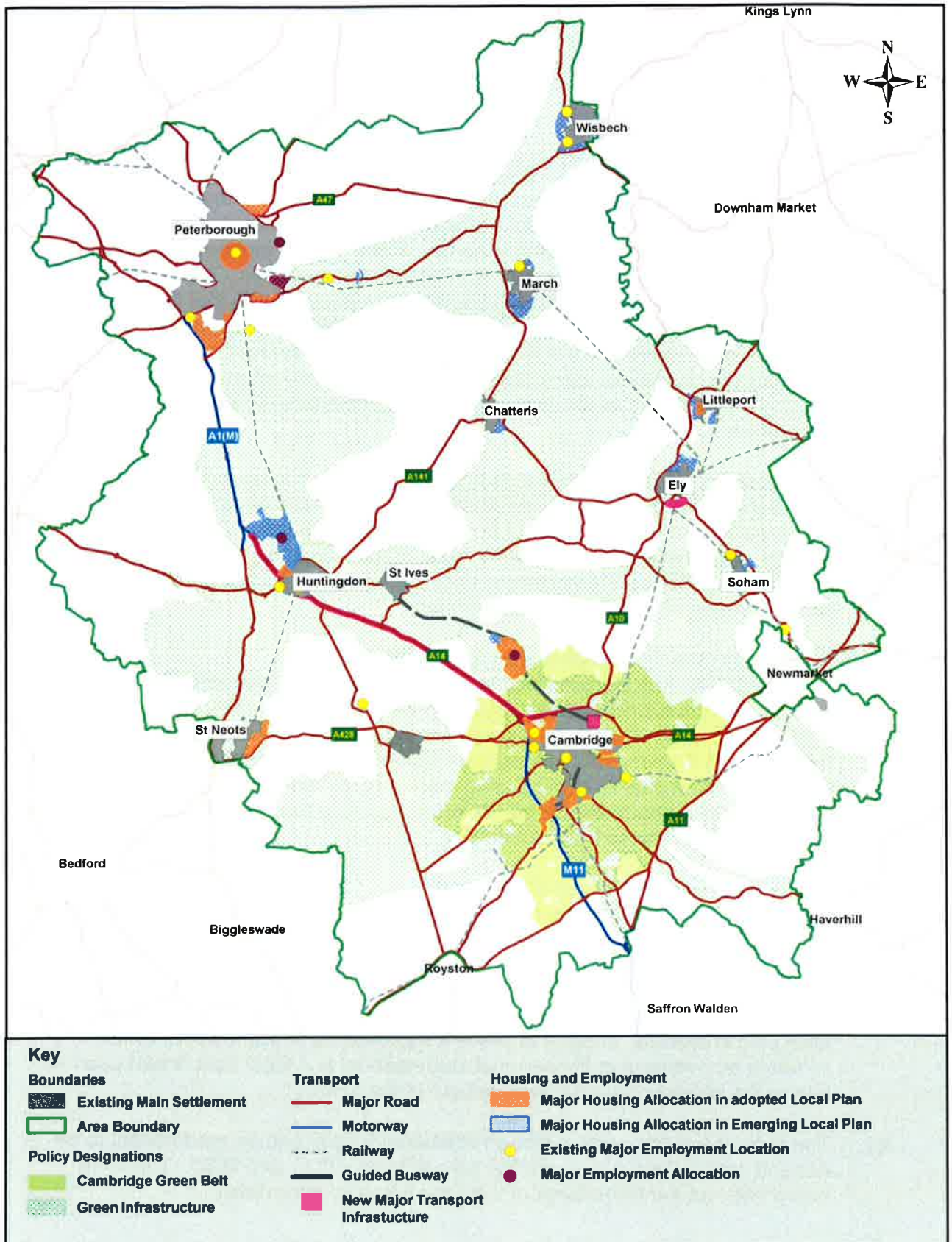
Further growth in Fenland will be directed towards the principal urban areas of March, Wisbech and Chatteris. A key objective is to ensure that growth complements and promotes sustainable economic regeneration. In East Cambridgeshire, a whole settlement masterplanning approach has been taken to planning for future development and this will lead to further planned development at Ely, Soham and to a lesser extent Littleport. The re-opening of Soham station and a southern bypass for Ely are important ambitions towards delivering sustainable growth. Increasing economic activity rates and diversifying the local economy remain important challenges in north Cambridgeshire as a whole.

Huntingdonshire will see a significant uplift in economic activity and population through the new Enterprise Zone on the former Alconbury Airfield. The increased population resulting from the creation of some 8,000 additional jobs will require a balanced and carefully planned approach to housing. Additional homes will be located close to these jobs and more generally population increases will be accommodated across the market towns and other sustainable locations. Ensuring sustainable travel choices are available is vital with the strategic scale of development anticipated at the Enterprise Zone. Key strategic elements could include a new rail station at Alconbury and links to the Cambridgeshire Guided Busway.

Cambridge and South Cambridgeshire have a strong geographic relationship. Interdependencies between the two administrative areas are well-established through the location of key employment sites and patterns of travel to work. Urban capacity within Cambridge will be an important source of future development opportunities. This includes expanded employment opportunities around the proposed new Science Park rail station to the north of the city. The authorities will need to consider carefully the balance of development across their areas, taking account of the purposes of the Cambridge Green Belt, the sustainability of existing settlements and the opportunities to create new settlements. It is not expected that any unplanned strategic scale development, including any additional new settlements, will be accommodated within Cambridgeshire once the local plans are adopted.

Creating sustainable transport links between the main urban areas and centres of employment is a current and longer term strategic aim. Key elements of this network are already in place with the Guided Busway and emerging plans for a new rail station to the north of Cambridge. The further development of these linkages will build on the area's economic strengths, including its good links to London. Eventually, this should enable sustainable movement between Cambridge, Northstowe, the Enterprise Zone and Peterborough. This enhanced public transport network will in turn provide a focus for future sustainable growth.

Cambridgeshire & Peterborough towards 2031



Scale (at A4) 1:400000

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Objectively Assessed Need for Additional Housing – Memorandum of Co-operation between the local authorities in the Cambridge Housing Market Area

1.0 Introduction

- 1.1 The National Planning Policy Framework (NPPF) requires local planning authorities to have a clear understanding of housing needs in their area. To achieve this, they should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period¹. This is a key part of the evidence base to address the NPPF requirement of ensuring that Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework².
- 1.2 The Localism Act 2011 places a Duty to Co-operate on local planning authorities³. This requires them to engage constructively, actively and on an on-going basis in the preparation of development plan documents where this involves strategic matters. National policy in the NPPF adds to this statutory duty as it expects local planning authorities to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts.

2.0 The Cambridge Sub-Region Housing Market Area

- 2.1 The Cambridge Sub Region Housing Market Area comprises all five Cambridgeshire districts (Cambridge City, East Cambridgeshire, Huntingdonshire, Fenland and South Cambridgeshire), plus the west Suffolk districts of Forest Heath and St Edmundsbury. Due to its historic and functional ties with Cambridgeshire, plus its own housing market area overlapping with the Cambridge Housing Market Area, Peterborough City Council has also collaborated with these local authorities.

3.0 Demonstrating the Duty to Co-operate

- 3.1 The seven districts within the housing market area, together with Peterborough City Council, have collaborated in recent months to meet the requirements of the NPPF set out in section 1.0. The outputs from this collaboration are a new chapter of the SHMA, which identifies the scale and mix of housing needed across the area by 2031 (and extending to 2036 for Huntingdonshire to meet its proposed local plan end date). Integral to this is a separate Technical Report, which provides an overview of the national, sub-national and local data drawn upon to inform the levels of housing need set out in the SHMA.
- 3.2 The outcome of this work is that an additional 93,000 homes are forecast to be needed across the housing market area between 2011 and 2031. The table below sets out the breakdown of this total figure in more detail.

¹ National Planning Policy Framework, paragraph 159.

² NPPF, paragraph 47.

³ Localism Act 2011, section 110.

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All dwelling change 2011 to 2031

District	All dwelling change 2011 to 2031
Cambridge	14,000
East Cambridgeshire	13,000
Fenland	12,000
Huntingdonshire	17,000 (21,000 to 2036)
South Cambridgeshire	19,000
Cambridgeshire	75,000
Forest Heath	7,000
St Edmundsbury	11,000
Housing sub-region	93,000

Source: Strategic Housing Market Assessment

- 3.3 In determining housing targets in their local plans, local authorities should take account of the requirements of national policy and local circumstances.
- 3.4 In this regard, it should be noted that the Peterborough housing market area overlaps into Cambridgeshire. Peterborough is the largest urban centre within the travel to work area for the Cambridgeshire sub-region and is a major employment location with good transport links and infrastructure. On the basis of currently available figures, it has a net daily in-commute from Cambridgeshire of around 7,000 people. Peterborough has an up to date Local Plan (Core Strategy adopted in 2011 and a Site Allocations DPD adopted in 2012) with a substantial housing growth target of 25,450 between 2009-26.
- 3.5 Based on this background and engagement between all the local authorities listed in section 2.0, under the Duty to Co-operate, it is acknowledged by the authorities that Peterborough, in its up to date Local Plan, has already accommodated a proportion of the housing need arising in the Cambridge Housing Market Area, and it has been agreed that this proportion could reasonably be assumed to amount to approximately 2,500 homes (i.e. around 10% of its overall housing target).
- 3.6 Separately, Fenland and East Cambridgeshire District Councils have made considerable progress to date with their local plan reviews and, therefore, have established a good understanding of their areas' development opportunities and constraints. They have also taken account of the July 2012 joint statement by Peterborough and the Cambridgeshire authorities which confirmed that the 'strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development'⁴.
- 3.7 Based on all of the above, and agreement between all the local authorities working within the Duty to Co-operate, it has been agreed that, in their Local Plans, provision should be made for 11,000 dwellings in Fenland and 11,500 dwellings in East Cambridgeshire, rather than the full identified need set out in the table above.
- 3.8 Overall, and taking account of the 2,500 dwelling element of the Cambridge HMA's need already met in Peterborough's Local Plan, this leaves 90,500

⁴ Joint Statement on the Development Strategy for Cambridgeshire and Peterborough by the local authorities, July 2012.

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dwellings to be provided in the Cambridge HMA to ensure that the full objectively assessed need for housing in the Cambridge HMA will be met in forthcoming Local Plan reviews. The level of provision to be made by district is set out in the table below.

All dwelling provision 2011 to 2031

District	All dwelling provision 2011 to 2031
Cambridge	14,000
East Cambridgeshire	11,500
Fenland	11,000
Huntingdonshire	17,000 (21,000 to 2036)
South Cambridgeshire	19,000
Cambridgeshire	72,500
Forest Heath	7,000
St Edmundsbury	11,000
Total	90,500

4.0 Conclusion

- 4.1 The purpose of this memorandum is to formally record and make public the local authorities' agreement under the Duty to Cooperate to the position as set out in this Memorandum, subject to ratification by their full Council as part of their individual Local Plan preparation.
- 4.2 The eight authorities that form signatories to this memorandum agree, therefore, that the figures in the table above (and taking account of provision already met within Peterborough) represent the agreed level of provision by district in order to meet the overall identified need for additional housing within the Cambridge Sub Region Housing Market Area.

Joint Statement on the Development Strategy for Cambridgeshire and Peterborough by the local authorities¹

1.0 Introduction

- 1.1 In 2010 the Coalition Government announced its intention to abolish Regional Spatial Strategies (and by extension any 'saved' Structure Plan policies) and introduce a wholly locally-based planning system. In response to this changing policy environment the Cambridgeshire authorities issued a joint statement in autumn 2010 to set out their position in support of the existing, established development strategy for the County.
- 1.2 This statement updates and replaces that earlier one in the light of events since its publication in 2010. It is expanded to cover Peterborough in addition to Cambridgeshire, reflecting the history of joint working between the two areas, the shared objectives within the Local Enterprise Partnership, and the recent agreement to co-operate effectively and work together on strategic planning issues.

2.0 Background

- 2.1 The existing development strategy originated in the Cambridgeshire and Peterborough Structure Plan 2003 and with the support of all of the Cambridgeshire local authorities was incorporated in the East of England Plan (the Regional Spatial Strategy) published in 2008. These strategic plans informed the development of the City and District Councils' Local Plan and Local Development Frameworks, which currently are being implemented.
- 2.2 The key objective of the strategy is to secure sustainable development by locating new homes in and close to Cambridge and Peterborough and to other main centres of employment, while avoiding dispersed development which increases unsustainable travel and restricts access to key services and facilities. Further sustainable locations for growth focus mainly on Cambridgeshire's market towns and Peterborough's district centres, with one large new town (Northstowe) to be connected to Cambridge and other key locations through a new dedicated public transport option, the Cambridgeshire Guided Busway.
- 2.3 Implementation of the strategy is on-going, with new urban extensions being delivered in Cambridge and Peterborough. With the Busway now up and running, significant development activity is underway in Cambridge's southern and north-west fringes and an application for a first phase for the new town of Northstowe has been submitted. Major developments, essential regeneration and infrastructure provision in Cambridgeshire's market towns continue to make positive progress.

3.0 National and Local Developments

- 3.1 The National Planning Policy Framework, published recently, requires all local authorities to plan for sustainable development including planning positively for economic growth, with their local plans being prepared on the basis that

¹ Cambridgeshire County Council, Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Peterborough City Council and South Cambridgeshire District Council.

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objectively assessed development needs should be met. With the enactment of the Localism Act in 2011, all local authorities are now under a Duty to Co-operate in the preparation of their plans, both with each other and a range of other bodies.

3.2 The national economic situation has presented significant challenges in maintaining the pace of growth and the delivery of sufficient investment where it is most needed. In the face of these challenges, the Cambridgeshire and Peterborough local authorities have continued to take a positive attitude to delivery of the development strategy and have taken innovative approaches to funding challenges - for example, the equity investment in the southern fringe sites. This has enabled development to start earlier than would otherwise have been the case, whilst still securing a future financial return for the authorities, which can then be reinvested to support future high quality growth for the benefit of local communities.

3.3 The Greater Cambridge-Greater Peterborough Local Enterprise Partnership is now well-established and has secured the designation of an Enterprise Zone at the former Alconbury airfield. The County Council has also announced it is putting in place the funding to deliver a new rail station in the north of Cambridge, which will enhance public transport accessibility and provide some relief to congestion within the city. Work is now underway, led by the Department for Transport but working in partnership with the County and District Councils, to find a way forward for delivering improvements along the A14 corridor. The outcomes are critical in order to support a range of key development locations, including at Northstowe. An announcement from Government on the way forward is expected this summer.

4.0 The Response to these Challenges

4.1 Despite the clarity of and support for the existing development strategy, the local authorities realise the need to keep the broader, strategic perspective under consideration. As a result, all authorities except Peterborough City Council, which last year adopted a Core Strategy running to 2026, are undertaking a review or roll forward of their local plans.

4.2 The need for this work results from a range of factors, including fostering continued economic growth, providing sufficient housing and the need for delivery of the necessary infrastructure to support the development of sustainable communities. The review or roll forward of plans will also need to take account of the fundamental changes that are likely to impact on the existing strategy – for example, the current unavailability of Cambridge Airport for housing development or the introduction of the Enterprise Zone at Alconbury. With regard to the Enterprise Zone the local authorities will need to consider and effectively respond to the wider spatial implications of that designation as a matter of urgency. Nevertheless, it is critical that a combined clear focus and effort remains on the effective delivery of the existing ambitious strategy and the major developments that are part of it; and to recognise that Cambridgeshire and Peterborough, as a whole, still have more than adequate land coming forward to effectively deliver sustainable growth, which can be continued as the strategy is updated .

4.3 Preparation of these updated plans will take account of policies outlined in the National Planning Policy Framework, including wide community engagement in accordance with the principles of localism. This will enable engagement around a range of development needs, including community-based, locally-generated proposals as well as those of more strategic significance. Furthermore, the local authorities will continue their long history of close collaboration and joint working as part of their Duty to Co-operate. This will include jointly gathering appropriate

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forms of evidence to both inform their plans and to shape the formulation of their strategies. Their work will be supported and constructively challenged at a strategic level by a newly-formed Joint Strategic Planning Unit. Close links to the Local Enterprise Partnership will also be further developed.

- 4.4 In undertaking the review or roll forward of their plans, the local authorities are clear that fundamentally they will continue to be guided by the strategic principles which underpinned the original growth strategy, first set out in the 2003 Structure Plan. Locating homes in and close to urban areas and to other main centres of employment is critical to ensure appropriate, sustainable development. It is essential, therefore, that the future development needs of the wider area are considered and agreed through a strategic plan-led approach, which takes account of identified local and national priorities.
- 4.5 Pending this review of the strategy, the local authorities are clear that they remain committed to delivering the existing planned strategy, and that significant capacity exists in terms of housing and employment land supply as we recover from the recession. During the transition period leading up to the introduction of their new, updated local plans, the local authorities will continue to give full weight to current, adopted planning policies.

July 2012

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Extracts from the report of David Hogger
To Purbeck District Council on its Local Plan EiP



The Planning
Inspectorate

Report to Purbeck District Council

by David Hogger BA MSc MRTPI MCIHT

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 31 October 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE PURBECK
LOCAL PLAN (PART 1)**

Document submitted for examination on 25 January 2012

Examination hearings held between 8 and 17 May 2012

File Ref: PINS/B1255/429/1

examination hearings and the site visits that I undertook, that I have identified nine main issues upon which the soundness of the Plan depends. A small number of other recommendations are made in order to ensure compliance between LP1 and the Framework and these are set out under 'Other Matters'.

Issue 1 – The overall provision for housing

National Planning Policy

13. The Framework establishes the presumption in favour of sustainable development and states that local planning authorities should positively seek to meet the development needs of their area. Local plans should meet objectively assessed needs unless any adverse impacts would significantly outweigh the benefits or there are policies in the Framework (for example relating to protected wildlife sites and the green belt) which indicate that development should be restricted. The objective should be to boost significantly the supply of housing.
14. There is also a requirement for local plans to reflect the national policy in favour of sustainable development. To this end a new policy is required in chapter 5 of LP1 to confirm the Council's positive approach towards sustainable development **[MM5]**, thus ensuring consistency with national policy.

The Housing Needs of South East Dorset

15. The Bournemouth and Poole housing market area includes Bournemouth, Poole, Christchurch, East Dorset and Purbeck. The forecast need for 2006-2026 is for about 38,950 dwellings². It is acknowledged that the plans for these local planning authorities are at various stages of preparation but currently there would be a potential supply of over 41,000 dwellings over the period. This indicates that the housing target is likely to be exceeded on a sub-regional basis and it has been confirmed by the other Councils referred to above that the conurbation can meet its own housing needs without strategic provision being made in Purbeck.

The District's Housing Needs

16. The Strategic Housing Market Assessment (SHMA)³ identifies a need for about 3,400 dwellings in the District between 2011 and 2031 (170 per annum). If population projections are used then the demand could be as high as 4,000 dwellings⁴ by 2026. The draft revised RS included a target of 5,150 dwellings for Purbeck but this included 2,750 at Lytchett Minster (the Western Sector). Over the same period LP1 allocates 2,400 dwellings (120 per annum), which is the same number as the revised RS proposed for elsewhere in Purbeck (i.e. excluding the Western Sector).

² Council's written answer to Inspector's question 4

³ 2012 Update - CD120a

⁴ Council Examination Statement PDC/4.1

17. The Council argues that there is currently insufficient evidence to demonstrate that significant additional housing (above the 120 dwellings/annum) could be accommodated within the District without harm to European protected sites. Higher housing numbers were assessed (e.g. 1,000 on the edge of Wool, 500 on the edge of Wareham and 500 on the edge of Lytchett Minster)⁵ but it was concluded that although there may be the potential to mitigate growth at Wool (in terms of heathland protection), there would only be limited opportunities elsewhere.
18. The Sustainability Appraisal⁶ (SA) acknowledges that future housing needs will not be met and implies that this is a consequence of the constraints imposed by European protected habitats and transport infrastructure. Therefore on the basis of the evidence available the Council concluded that a precautionary approach should be adopted and that LP1 should include a figure of 2,400 dwellings (increased to 2,520 to take the plan up to 2027) – a number which it was confident could be successfully implemented in tandem with heathland mitigation measures. The Council argues that there is currently insufficient certainty that a higher level of growth would not significantly harm protected habitats and species. In its view the potentially adverse effects of development on European protected sites outweigh the objective of meeting all the District's housing needs. In the circumstances at the time (based on the ecological evidence available) it was reasonable for the Council to conclude that there was no certainty that a target of 170 dwellings a year could be achieved without harm to ecological interests and that the identification of a target of 120 dwellings per year was therefore justified. However, it is clear that more recent detailed analysis gives reasonable confidence that in some locations appropriate heathland mitigation measures could be provided.

Housing and Heathland Protection

19. Significant progress has been made (primarily by land owners) on the identification of sites for the provision of mitigation measures and the evidence demonstrates that there is the potential to accommodate such measures on a number of sites in the District (in the form of Suitable Alternative Natural Greenspace – SANGs). Further detailed assessment is required to enable confident conclusions to be drawn with regard to the contribution such sites can make to mitigating the impact of residential development but a number of reasonable opportunities appear to be available. The Framework encourages local planning authorities to be aspirational and to seek opportunities to deliver sustainable development. Current evidence indicates that the District could accommodate a higher level of growth than is currently being proposed by the Council (accompanied by appropriate mitigation measures) and hence its housing needs could be met more fully.
20. In terms of the housing allocations in LP1 and other potential residential development, reference to protecting ecological assets and the provision of mitigation measures (in the form of SANGs) is required in order to ensure that sites of ecological importance are afforded the appropriate protection. Therefore modifications **MM14 - part** (north west Purbeck), **MM17** (south west Purbeck); **MM20** (central Purbeck); **MM28** (north east Purbeck); **MM35**

⁵ HRA Implications of Additional Growth Scenarios for European Protected Sites – CD112

⁶ SD15

and **MM38** (south east Purbeck); and **MM52** (overarching policy advice relating to new development in the District as a whole) are necessary to strengthen the protection afforded to such sites in accordance with national policy.

South East Dorset Green Belt

21. A review of the green belt has been undertaken by the Council⁷ and was subject to a number of public consultation exercises. However, paragraph 85 of the Framework advises that 'safeguarded land' should where necessary be identified between urban areas and the green belt in order to meet longer term development needs. Bearing in mind the other significant constraints that exist in the District and the need for local planning authorities to positively seek opportunities to meet the development needs of their area, such an approach would be appropriate in Purbeck but it has not been adopted by the Council.
22. Land to the north of the allocated site in Lytchett Matravers is referred to by the Council, in its Statement on Matter 2, as having the potential to accommodate future settlement expansion and there is no reason to conclude that this and other appropriate 'safeguarded land' could not be specifically identified. Green belt boundaries should only be altered in exceptional circumstances but the local planning authority must be satisfied that the boundaries will not need to be altered at the end of the plan period and the evidence indicates that currently such certainty cannot be assured. It is therefore recommended that the green belt boundary and in particular the identification of 'safeguarded land' for future growth, be considered as soon as practicable [**MM2**]. This is an essential change in order that LP1 is justified, effective and consistent with national policy.
23. The land at Holton Heath and Sandford that it is proposed by the Council to add to the green belt was considered by the Inspector for the Purbeck District Local Plan⁸. He concluded that although the areas 'are no doubt capable of contributing to the Green Belt purposes' he could not recommend their inclusion because the test requires that the assumption that led to the land being initially excluded from the green belt has been 'clearly and permanently falsified by a later event'⁹. At that time the Structure Plan continued to identify the area as a strategic location for development. That allocation has now been abandoned and consequently this 'later event', which is exceptional in its nature, has occurred and provides the justification for the extension of the green belt at Sandford and Holton Heath.
24. Objection was raised to the inclusion of land in the vicinity of Worgret Road (to the west of Wareham) in the green belt. This is part of a re-alignment of the western boundary of the green belt, which is currently poorly defined on the ground and which has been artificially tied to administrative boundaries. The Framework states that boundaries should be clearly defined using physical features that are readily recognisable and likely to be permanent. The Council has followed this advice by proposing a boundary that follows specific features on the ground. The exceptional circumstances required to alter a green belt

⁷ CD127

⁸ Inspector's Report 2002

⁹ COPAS v the Royal Borough of Windsor and Maidenhead (2001)

boundary therefore exist and the Council's approach is sound.

Conclusion on Issue 1

25. *Paragraph 14 of the Framework specifically states that objectively assessed needs should be met unless any adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate that development should be restricted. Paragraph 152 advises that significant adverse impact on the environmental dimension of sustainable development (i.e. biodiversity) should be avoided and options which reduce or eliminate such impacts should be pursued. It is also reasonable to apply the principle in paragraph 118 (first bullet point) which advises that if significant harm cannot be adequately mitigated planning permission should be refused.*
26. *Against this background the Council's precautionary approach to the allocation of housing sites is currently justified because of the uncertainty regarding the effect of development on European Nature Conservation sites. However, it has not been conclusively demonstrated that the most appropriate strategy is being promoted by the Council, particularly for the medium to longer term in the plan period. It is clear that there may now be reasonable opportunities available for the provision of heathland mitigation measures, particularly in the medium term, and the Council acknowledge this to be the case.*
27. *I have given very careful consideration to the situation. On the one hand LP1 does not allocate sufficient land for housing but on the other hand further detailed work is required to confirm the suitability of a number of potential heathland mitigation sites. I must also take into account the fact that the proposed settlement extensions would make a significant contribution to housing supply in the short term (including affordable housing). Circumstances are similar to those surrounding the Purbeck Local Plan Final Edition (2004) which was never statutorily adopted because the implementation of a strategic housing allocation at Holton Heath and the provision of the Sandford by-pass could not be satisfactorily achieved without significant harm to nature conservation interests, thus creating what has been described as a policy vacuum.*
28. *The Council currently has no adopted policies in place and if LP1 is not adopted there is the risk of 'planning by appeal' and the loss of public confidence in, and support for, the process. This cannot be in the best interests of the local community especially bearing in mind that the Framework promotes the need to strengthen local decision making and reinforces the importance of up-to-date plans. I am also mindful that there is the potential for a significant level of development to be allocated at Crossways (on the boundary with Purbeck) by West Dorset District Council, in the West Dorset, Weymouth and Portland Local Plan. Also Poole Borough Council is proposing to review its Core Strategy in 2013. The duty to co-operate, together with the timing of these various documents will ensure that cross boundary issues can be more thoroughly addressed.*
29. *A majority of the policies in LP1 would endure throughout the remaining 15 years of the plan period and in the short term LP1 would provide an appropriate framework for housing development in the District (see paragraph 35). It is particularly in the medium to long term that the Council should be*

seeking to allocate further land to meet more fully its housing needs.

30. *It has been suggested that rather than progressing with the adoption of the submitted Local Plan, the Council should divert its resources to an immediate review of the document, thus ensuring that the review would be adopted prior to the currently anticipated date of 2017. There are arguments both ways but I consider that the objectives of the Framework are best achieved in the short term by the adoption of the current document (as proposed to be modified), which is programmed for later this year. If the plan was withdrawn for further work to be undertaken by the Council the policy vacuum in the District would remain which would be contrary to the objective of achieving local plan coverage across the country as soon as possible and it is not clear that much time would be saved by taking this approach, bearing in mind work on the review will start in earnest next year. In these exceptional circumstances I consider that the adoption of LP1 as a short term measure is the most appropriate way forward and that the Council's approach is justified.*
31. *It is recommended that a section is included in LP1 entitled 'Future Partial Review' [MM2]. This commits the Council to a partial review of the plan to commence in 2013 (with adoption in 2017)¹⁰ and refers to achieving a target of 170 dwellings per annum. Among the issues to be addressed in the review will be additional settlement extensions to contribute to meeting housing needs and a review of the green belt including the potential for safeguarded land. This will enable the Council to consider in detail and resolve heathland mitigation measures and also to co-operate with West Dorset District Council with respect to potential development at Crossways. It is also recommended that a new paragraph be inserted in the supporting text in order to add detail to the Council's approach [MM8].*
32. *The Council will not be able to rely on these reasons for delay in three years time. This is a short term expedient approach and because the District will continue to be under pressure for additional housing (a need that is likely to increase) it is imperative that the early review is undertaken. If there was any evidence that this could not be achieved then LP1 would not be sound. On the basis that the review of LP1 will commence in 2013, the plan can currently be considered to be sound. This approach should not be seen as a template for others to follow, it is only justified because of the exceptional circumstances which currently exist in this District.*
33. *With the Modifications proposed LP1 makes sound provision for housing in the short term and includes the mechanism by which housing supply, particularly in the medium to longer term, can be boosted.*
34. *It is against the background of an imminent review of the local plan that the remainder of this report should be read.*

¹⁰ See 'Response to Queries Raised by the Inspector after Completion of the May 2012 Hearing Sessions'