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RTPI

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SUMMARY NOTE

ECONOMY MATTER G

PREPARED FOR

EIP INSPECTOR

RELATING TO LAND AT

Sandford Lane, Wareham

PREPARED ON BEHALF OF

WESSEX WATER

PREPARED BY

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SUMMARY NOTE PREPARED FOR INSPECTOR

Wessex Water own the subject land in Sandford Lane, Wareham.

A submission was made at draft plan stage for the land to be included within the Local Plan as an allocated employment site to fulfil a specific need for Wessex Water to provide a regional headquarters, administration centre and depot.

The Council initially included the site within the draft Local Plan as an allocated employment site.

The Council then subsequently removed the site from the plan on the basis that they had a surplus of employment land and the site was not required to meet any identified needs.

Wessex Water did make submissions to the Council that they did indeed have a specific need for a regional office and storage/workshop facilities. Submissions were also made as to why other identified/allocated employment land was not suitable.

The Council responded by stating that the proposed regional office and depot was not necessarily an employment/B class use and they considered it to be a sui generis use. The Council stated that an employment allocation would not have therefore facilitated the proposed development. (See attached email response from Council).

The Council then went on to say that because the development was critical infrastructure that they could envisage supporting development on the site. They acknowledged that such would be regarded as inappropriate in the Greenbelt but suggested that a case could be made for exceptional circumstances due to the role and function of the proposed development.

If the Council's position is that the site is not an employment use and an allocation as employment land would not facilitate the development, then the same must apply to all other allocated B class employment sites. That is to say that they are not suitable for the use.

However, we are strongly of the view that the use of the site for offices, storage, depot and other ancillary uses is clearly a B class use.

Wessex Water clearly do have an essential need for the facility and the allocation of the subject land would meet this identified need and support growth of employment uses in line with employment objectives.

The Council's initial inclusion of the site indicated that there were no specific site constraints or strong Green Belt reasons why the site could not be allocated. The only reason for not allocating was the perceived surplus of employment land. Wessex Water have undertaken extensive site investigation including Geotechnical, Contamination, Flood Risk and Environmental Assessment and there are no barriers for this site to come forward for development subject to the proposed allocation, all this information having been provided to Dorset Council (Purbeck) at the early stages of the local plan review.

Wessex Water made representations at the EIP that in fact there was not a surplus and that other land allocated was not suitable for general employment needs and for Wessex Water's needs. The main allocation is at Innovation Park where the majority of future employment land is proposed to be sited.

As stated at the EIP and confirmed orally by the Council at the EIP, Innovation Park is restricted to certain uses and types of employment. The permitted uses are advanced engineering, defence, marine engineering and cyber security.

The site has occupation restrictions linking to these uses. A works depot principally used for storage and engineering works off site will not meet the occupancy requirement and will be contrary to the aims of Innovation Park for advancing engineering and manufacturing on the site.

The main issue with relying on Dorset Innovation Park in the employment land review to supply almost 85% of the available land in the former Purbeck District is that it distorts the true availability. The land is not available for all businesses with it being restricted to a very limited category of employers that fall within certain sectors. It is well accepted that logistics and distribution make up a far more significant proportion

of the industrial warehouse sector and employment needs within the area, but these are completely excluded from Dorset Innovation Park.

Innovation Park is not available to Wessex Water but also there would be significant viability issues. The land at Sandford Lane is owned by Wessex Water and can be delivered viably. This is a significant point and relates to the regulatory requirement of Wessex Water to deliver utility services at a required level and within certain financial stipulations.

To conclude, there are no constraints preventing the subject land being allocated. The reason for it not being allocated is due to a perceived surplus which does not stand up to scrutiny.

The Inspector is requested to find the plan unsound on the basis that the evidence base does not identify sufficient land of the type and amount of employment land needed to accommodate a diverse range of employment in the plan period. The evidence base is therefore not robust and up to date. The plan does not provide for the diverse needs of the area and specifically it does not meet the particular identified need for Wessex Water to provide an additional employment site at Sandford Lane. The Council acknowledge this need and indeed say they will support it but only by way of the very special circumstances route. This approach however does not provide the certainty that Wessex Water require.

The Inspector is requested to suggest a modification that the plan can be made sound by allocating additional land for employment use including the land at Sandford Lane in order to help deliver a diverse supply of available land to meet needs across the board and the specific requirement of Wessex Water.

plp.programmeofficer

Subject: FW: Sandford Lane, Wareham - EIP summary note
Attachments: 151671_T_190211_ADOPTED LDO SoR_v7.pdf
Switch-MessageId: 7f287cc5af8e455f81ad093c59d0cdaf

From: Steve Boyt
Sent: 04 October 2019 08:56
To: plp.programmeofficer <plp.programmeofficer@dorsetcouncil.gov.uk>
Cc: Frances Summers <frances.summers@dorsetcouncil.gov.uk>
Subject: RE: Sandford Lane, Wareham - EIP summary note

Helen,
Having considered Wessex Water's summary note the Council has shared the following comments with Mr Parke:

- The third paragraph of the summary note states that 'The Council initially included the site within the draft Local Plan as an allocated employment' – The Sandford Lane site was not allocated for employment land through a policy in the pre-submission draft Purbeck Local Plan that was published on 22nd October 2018. The Council consulted on an 'option' to allocate the Sandford Lane site for employment purposes in the Regulation 18 'Purbeck Local Plan Partial review, Options Consultation, June 2016' (<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/consultations/options/options-consultation-document-2016.pdf> - pages 55 to 61).
- The fourth paragraph of the summary note states that 'The Council then subsequently removed the site from the plan on the basis that they had a surplus of employment land and the site was not required to meet any identified needs.' – The Council is satisfied that its local plan has been positively prepared, and in particular that its strategy around allocating/safeguarding land for employment purposes will support economic growth in Purbeck over the plan period (see paragraphs 68, 69 and 70 of the Council's Economy Background Paper <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/submission-documents/sd25-economy-background-paper.pdf>). The Sandford Lane site is located in the Green Belt. National planning policy in respect to the Green Belt was updated in the National Planning Policy Framework (NPPF) 2019 (Government consulted on changes to the NPPF early in 2018 and initially published an updated version of the NPPF in Summer/Autumn of 2018 prior to pre-submission publication of the Purbeck Local Plan). Taking account of the employment land which the Council considers is needed to support economic growth in Purbeck, and existing policy allocations and safeguarded land, the Council does not consider that changes to Green Belt boundaries at the Sandford Lane site are justified. Nor does it accept that Wessex Water has demonstrated through its responses to the local plan, or its presentation to the Inspector during the hearings, that changes to Green Belt boundaries are justified.
- The seventh paragraph of the summary note states that 'They acknowledged that such would be regarded as inappropriate in the Green Belt but suggested that a case could be made for exceptional circumstances due to the role and function of the proposed development.' – Paragraph 143 of the NPPF states that inappropriate development should not be approved in the Green Belt unless there are very special circumstances. Changes to Green Belt boundaries through the plan making process must be justified with a consideration of alternatives (paragraph 137 NPPF) and exceptional circumstances (paragraph 136 NPPF).

- The fifteenth paragraph of the summary notes states that ‘The land [in reference to land at Dorset Innovation Park] is not available for all businesses with it being restricted to a very limited category of employers that fall within certain sectors.’ – The Council has attached a copy of the Local Development Order (LDO) for Dorset Innovation Park. Page 28 of the LDO clarifies that the following classes of development are permitted on the site: B1(a), B1(b), B1(c), B2 and B8. The LDO imposes a limitation on the distribution of land uses across the site in accordance with a Land Use Area parameter Plan as set out in the Design Guide (page 28).

The Council and Wessex Water disagree on whether there is a need to include a policy allocation for employment land at Sandford Lane in order to support economic growth in Purbeck. As stated during the hearing sessions, nor does the Council agree with Wessex Water’s conclusions that ‘there are no constraints’ preventing the Sandford Lane site being allocated through the local plan. The Council does not consider that changes to Green Belt boundaries have been justified in accordance with the tests in the NPPF. The Council and Wessex Water also disagree on the characterisation of the proposed use of the site. The Council considers that its strategy for supporting economic growth is sound and consistent with other policies in the NPPF relating to the Green Belt.

Regards – Steve