

Purbeck Core Strategy Development Plan Document

Examination into the soundness of the plan

Statement on behalf of Purbeck District Council

Hearing date: Tuesday 15 May 2012 – 2pm

Matter 14: Central Purbeck (Policy CEN)

Issues

- 14.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?
- 14.2 Is the Council's approach towards the modification of the green belt boundary in Central Purbeck appropriate and adequately justified?
- 14.3 Wareham is a key town in the District but does not have an employment allocation. Is this approach justified?
- 14.4 Is there sufficient evidence to demonstrate that the proposed SANGs are appropriate in terms of size, location and use and can be fully implemented?

Introduction

1. This statement considers all the issues within Matter 14: Central Purbeck (Policy CEN)

Statements of common ground

2. A statement of common ground (SCG) is being prepared between Bloor Homes, Natural England, The Scott Estate and Purbeck District Council to provide heathland mitigation for approximately 160 dwellings at Worgret Road. The SCG has not been finalised by the deadline for submission of this statement (18 April 2012).

Why the Council considers the Core Strategy sound

3. Each issue raised by the Inspector is considered in turn below:

14.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?

National Guidance

- Policy CEN: Central Purbeck was written to be consistent with national guidance in Planning Policy Statement (PPS) 1: Delivering Sustainable Development which has now been deleted. The PPS required development plans to contribute towards the delivery of sustainable development through the achievement of social, economic and environmental objectives. The policy for growth and change in the Central Policy Spatial Area reflects this approach by focusing development in the most sustainable settlements, thereby reducing the need to travel by car and the subsequent impact on climate change. The policy also sets out an integrated approach to achieving sustainable development by addressing a range of social (housing, health, education, community facility provision), economic (employment and retail provision) and environmental objectives (habitats and wildlife, green infrastructure and transport).
- 2. The National Planning Policy Framework (NPPF), which supersedes PPS1, sets a presumption in favour of sustainable development. Policy CEN: Central provides a clear local policy to ensure the delivery of sustainable development within the Central Policy Spatial Area of the district (as set out above) whilst fully taking into account local circumstances and the area's relationship with the rest of the district.

Local Needs

3. Wareham is identified in Policy LD: General Location of Development and Policy CEN: Central as a Market Town (RSS Development Policy B Settlement) which together with Swanage is the level of settlement which should be the main focus for housing development. This approach reflects the recommendations of the settlement strategy which directs development towards the most sustainable settlements within the district that have the widest range of facilities and services. Wareham is also located centrally within the District and provides a wide range of important facilities and services which support both the town and the wider community, for example Purbeck School, District Council Offices, police and fire stations, health facilities (hospital and doctor's surgery) and railway mainline connections.

- 4. Elsewhere in the Central Policy Spatial Area, Policy LD: General Location of Development identifies Sandford as a 'Key Service Village'. This level of village has the highest level of population and facilities, including important facilities such as a school and doctors' surgery, and acts as a hub to surrounding settlements thereby reducing the need to travel. Key Service Villages are therefore considered suitable by the Council for some limited growth due to their sustainable location and role as a hub to surrounding settlements. Limited growth would also help to sustain vital rural services and facilities for example the local school and doctors' surgery, reducing the need to travel within the wider rural area, and supporting remaining shops. Sandford, is however heavily constrained by heathland and Green Belt, and also suffers from traffic congestion and the associated impacts of air pollution. As a result, the level of development proposed in Sandford is small in scale and does not include any identified housing allocation.
- 5. Stoborough is identified as a 'Local Service Village' which needs some small scale growth to sustain its vital rural services. Ridge is identified in Policy LD: General Location of Development as an 'other villages with a settlement boundary' within which some small scale development would be considered appropriate.
- 6. Background Paper 4¹ sets out 9 development options for growth across the district. Officers assessed each option in detail and all were considered to be reasonable taking into account the [previously] emerging Regional Spatial Strategy (RSS), the settlement strategy, existing housing completions and commitments (planning permissions), retail and employment provision, and the large number of constraints within the District. Of the 9 options assessed in detail, the Council considered the following 3 were the most appropriate for the 2009 Core Strategy Preferred Options consultation²: (i) distributing development around Swanage, Upton, Wareham and the Key Service Villages of Bere Regis, Lytchett Matravers and Wool; (ii) concentrating growth on the edge of Wareham and (iii) focusing growth at Swanage.
- 7. The 2009 Preferred Options Consultation considered three options for growth across the District. Alternative Option A proposed the concentration of growth on the edge of Wareham including a settlement extension of 635 dwellings, 5 hectares of employment provision and a large supermarket. This option was not supported by the local community³, with only 19.7% of respondents showing support. Clear support (67% of responses from an overall 8% response rate)⁴ was expressed for the distribution of development around the district's towns of Swanage, Upton and Wareham and the Key Service Villages of Bere Regis, Lytchett Matravers and Wool.
- The 'Where shall we build in Central Purbeck 2012 2026?' consultation⁵ in the Summer of 2010 considered three options for growth at Wareham. Clear support⁶ (46% of respondents) was expressed for Option A to develop 200 dwellings as part of a mixed use scheme along Worgret Road and within the bypass.
- 9. Following the 'Where shall we build 2012 2026?' consultation and consultation on the Retail Impact Assessment, the Council agreed the general approach to

¹ CD30: Volume 4: Development Options

² CD16: Core Strategy Preferred Options 2009 ('Planning Purbeck's Future')

³ CD17c: Responses to development options and supermarket responses

⁴ CD17c: Responses to development options and supermarket responses

⁵ CD21: Where shall we build in Central Purbeck 2012 – 2026?

⁶ CD26: Where shall we build in Purbeck 2012 – 2026? Consultation results 2010.

development across the District and the housing allocations at two meetings to agree the Core Strategy Pre-Submission in October 2010. In response to the high level of objection received and potential impact on Wareham Town Centre, the Council decided not to allocate a supermarket at Wareham, but instead decided to allocate the full 200 dwellings at Worgret Road.

- 10. One of the key aims in allocating the site at Worgret Road is to enable housing development to support the redevelopment of community facility and service provision within the locality. In particular, the potential integration of health care facilities, emergency services provision (fire station, police station and former law court) and the re-organisation of local schools. The number of organisations involved and their varying review schedules mean that it is unlikely that a comprehensive and integrated redevelopment can now take place. Instead, the housing and education elements are likely to be built first, and the other service provision at a later unconfirmed date.
- 11. A Development Brief Scoping Report has been prepared and approved by Purbeck District Council for the site at Worgret Road. The report provides a strong steer for future development and has been endorsed by the town council⁷. There is currently some doubt concerning delivery of between 40-60 of the 200 dwellings proposed, as the availability of the Wareham Middle School playing fields for development is uncertain. However, preparation of the scoping report for the development brief has involved close working with the agents and developer of part of the site, who are keen to deliver between 140 and 160 dwellings. The part of the mixed use allocation, where housing development will be focused is shown on the Minor Changes Schedule⁸.
- 12. Dorset County Council is working on a review of school places in Purbeck, due to falling school rolls. The Council has worked alongside DCC to ensure that growth in the Central Policy Spatial Area continues to support future school rolls and maintain the presence of a viable school in the areas town and villages.

Economic, Social and Environmental Impact

- 13. The Sustainability Appraisal (SA)⁹ notes that there will be short term positive effects from the provision of affordable homes on the proposed housing allocations, although the longer term housing needs of the district will still remain. Other positive effects include improvements to health and standards of living through the provision of new or improved recreation and community facilities, service provision, schools re-organisation and support for the viability of businesses in Wareham Town Centre. New and / or improved community facilities will increase self-containment and reduce the need for out-commuting. Improved public transport and cycling provision along the A351 will allow residents to access employment opportunities at Holton Heath and have positive effects in reducing poverty, reducing the need to travel and increasing accessibility to services and facilities.
- 14. Potential negative effects include impact on nearby protected habitats. However, in terms of mitigation measures, the SA notes that the provision of SANGs will mitigate additional impact on nearby protected habitats. The SA also notes that the new

⁷ CD152: Worgret Road Wareham Development Brief 2012

⁸ SD26: Minor Changes Schedule, page 23

⁹ SD15: Sustainability Appraisal for Proposed Changes to Core Strategy Pre-Submission 2011

housing could affect the setting of Wareham, however, the location within the bypass is likely to mean that impact on the landscape, townscape, and cultural and historic assets would not be significant. Although not significant, the SA identifies likely increases in waste production, land, water, air and light pollution, and water and energy consumption. However, there is potential to deliver a combined heat and power scheme which could generate power to heat public buildings such as the schools and leisure centre thereby reducing energy consumption.

14.2 Is the Council's approach towards the modification of the green belt boundary in Central Purbeck appropriate and adequately justified?

- 15. As explained in the Council's statement on Matter 2, the Council's housing strategy is to spread development across the most sustainable settlements according to their role and function, and location within the settlement hierarchy. This approach ensures that the significant District-wide need for affordable housing is provided for across the District.
- 16. Paragraph 83 of the NPPF allows for the release of land from the green belt in exceptional circumstances. Purbeck's critical need for affordable housing provision provides strong justification for the allocation of housing sites within the South East Dorset Green Belt. The Council's decision to revise the green belt boundary to accommodate settlement extensions is informed by a comprehensive Green Belt Review¹⁰. This review has been subject to public consultation, as also detailed in the Council's statement on Matter 2.
- 17. The need to find settlement extension sites was not the only reason to undertake a green belt review. With particular regard to the central spatial area, the boundary to the south and west of Wareham is ill-defined to align with plan and parish boundaries, rather than logical and defensible landlines. Elsewhere, land was previously excluded from the green belt to allow for strategic housing growth in the Sandford/Holton Heath area (as allocated through the Bournemouth, Dorset and Poole Structure Plan (2001)). The introduction of The Habitats Regulations has meant that this housing growth will not come forward, and there is now a clear case for the land to be included within the green belt designation. The Purbeck District Local Plan Final Edition (2004) proposed an extension to the north-west extent of the green belt (part of which fell within the central Purbeck area) to ensure conformity with the Structure Plan. However, the relevant Structure Plan policy has not been saved, so there is no higher level policy remaining to justify its retention, plus it was never adopted in the Local Plan. This means that the extension to the green belt has never been adopted and has always been treated as a material consideration. The extent of the adopted green belt is seen to perform an adequate function and there is a clear case for it not to be extended.
- 18. In summary, the lack of a clear definition of the South East Dorset Green Belt and the need to find suitable sites for settlement extensions provide the exceptional circumstances to justify review of the green belt in Purbeck.
- 19. The Green Belt Review was assessed using the five purposes set out in paragraph 80 of the NPPF for designating land as green belt. Land included at Worgret Road was assessed not to fulfill any of these purposes. Clearly, the bypass situated to the west now acts as a defensible barrier that could prevent further expansion of the

¹⁰ CD127: Green Belt Review (August 2011)

settlement. Therefore, the release of land at Worgret Road would not harm the function of the green belt, as long as the bypass is not breached. Objectors argue that the Wareham Middle School playing fields, which fall between the existing town and the bypass, should be retained as green belt as a way to prevent development. However, in the context of paragraph 80 of the NPPF's criteria, there is no justification for this. The result would be a fragmented green belt that would not perform a strategic function. Therefore, the Council considers it appropriate for the land within the bypass to be removed from the green belt.

14.3 Wareham is a key town in the District but does not have an employment allocation. Is this approach justified?

- 20. Wareham, the smallest of the three towns in the District, has three industrial estates which offer a range of premises that have some potential for redevelopment. Much of the area around Wareham is constrained by environmental designations, flood zone areas and Green Belt. Some proposed employment sites were submitted as mixed use schemes with proposed housing development through the Strategic Housing Land Availability Assessment (SHLAA). These sites were all situated on greenfield land within the Green Belt. The promoted housing elements were rejected following Council assessment and public consultation. The employment elements were not then made available by the landowners. Instead, redevelopment of previously developed land outside of the Green Belt at nearby Holton Heath, which is also rail served, provides a more sustainable and less intrusive option. This site is within easy commuting from Wareham and additional development here would consolidate and enhance the existing employment centre. This will be further supported by improved sustainable transport from Wareham by rail, bus and cycle links.
- 21. It is appropriate to provide further housing growth at Wareham in order to support the existing services, facilities and schools located here. It would not be possible to build this new housing at or near to Holton Heath on account of the constraints associated with the designated heathland of this area.

14.4 Is there sufficient evidence to demonstrate that the proposed SANGs are appropriate in terms of size, location and use and can be fully implemented?

- 22. Natural England made representations to the Core Strategy Pre-Submission requiring greater certainty over the delivery of SANGs. Following discussion with Natural England and the Council's consultant Footprint Ecology, the mitigation requirements were agreed. Officers approached Bloor Homes as developer of the Worgret Road site to discuss the mitigation proposals.
- 23. The developer and landowner offered two potential SANGs in Arne Parish. The general location of these two sites was illustrated on maps in the Proposed Changes to the Pre-Submission Core Strategy¹¹. Natural England again made representations that further detail was required. In response, the Council met with the developer and landowner in February 2012 to agree a SCG on the delivery of the SANGs. The SCG has not been finalised by the deadline for submission of this statement.

¹¹ SD18: Core Strategy - Proposed Changes to the Pre-Submission 2011

Suggested changes for the Inspector to consider

- 24. Update as per changes 45-56 of the Minor Changes Schedule¹². In particular, the Council suggests that the text should be amended to reflect the willingness of the developer to bring forward a 'significant proportion of the 200 dwellings' at Worgret Road, Wareham (minor change number 52). The wording of Policy CEN should also be amended to reflect this by inserting the word 'approximately' in front of 200 dwellings (minor change number 49). The Council also suggests that an addition is made to Map 11 to make the focus for housing growth clearer (minor change number 50). These three specific changes will be consulted on as modifications to the Core Strategy after the hearings have been completed.
- 25. In addition, add to Policy CEN:

"New employment development will be focused at Holton Heath to provide both local and wider job opportunities, supported by improved public transport links with Wareham. Existing employment sites at Westminster Road, Sandford Lane, Johns Road, Holton Heath, Admiralty Park and Romany Works will be safeguarded on the Proposals Map and reviewed through a subsequent plan(s)".

¹² SD26: Minor Changes Schedule