

# Purbeck District Council: Core Strategy Examination in Public Submission on behalf of ZBV (Winfrith) Ltd

Reference: 4953

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## Consultation on the National Planning Policy Framework (NPPF)

- 1.1 ZBV (Winfrith) Ltd have submitted a number of statements responding to those questions raised by the Inspector in relation to the various matters to be considered at the forthcoming Examination in Public (EiP) into the Purbeck Core Strategy. Within those statements comments are made in reference to the compliance of the Core Strategy with the policy framework set out by the recently published National Planning Policy Framework (NPPF).
- 1.2 However, to assist the Inspector's consideration of the soundness of the Purbeck Core Strategy, we provide a summary assessment of the principal Core Strategy policies and their consistency (or otherwise) in light of the Government's main planning policy requirements as expressed within the NPPF.
- 1.3 ZBV is aware from paragraph 208 (Annex 1) of the NPPF that policies within the NPPF will "apply from the day of publication". Paragraph 213 also advises that plans may need to be revised to take into account the policies within the framework. This should be progressed "as quickly as possible, either through a partial review or by preparing a new plan".
- 1.4 It is ZBV's view that the Purbeck Core Strategy (as currently drafted) is inconsistent with a number of those policies set out within NPPF, particularly in relation to promoting/delivering sustainable development, promoting economic growth and meeting housing needs.
- 1.5 Furthermore, ZBV also believes that the Core Strategy fails to adequately address a number of the objectives for 'Plan-making' set out within

paragraphs 150-182 of the NPPF, particularly in terms of planning positively to meet identified demands, and ensuring that policies are based on ‘adequate, up-to-date and relevant evidence’.

1.6 ZBV do not believe that there is any “quick fix” to bring the Purbeck Core Strategy into line with the requirements of the NPPF. Rather, it is ZBV’s view that further assessment work/evidence testing is required, alongside a fundamental review of the proposed policy approach. On this basis, we do not consider the Core Strategy (as currently drafted) to be sound and consistent with the requirements of Paragraph 182.

1.7 We summarise our reasoning to the core elements below:

#### Presumption in favour of sustainable development

1.8 The NPPF makes it clear that the “purpose of the planning system is to contribute to the achievement of sustainable development”. Paragraph 7 identifies three dimensions to sustainable development, namely: economic, social and environmental. Paragraph 8 makes it clear that these 3 elements should not be seen in isolation, rather they are mutually dependent. To achieve sustainable development, the NPPF states that “economic, social and environmental gains should be sought jointly and simultaneously through the planning system”.

1.9 In ZBV’s view this is a key objective of NPPF policy – and should be at the heart of local plan policy. However, ZBV is concerned that the Purbeck Core Strategy fails to take a co-joined approach towards economic, social and environmental policy objectives. In particular, the Core Strategy:

- does not (in Policy ELS) include a clear delivery strategy to promote economic growth and the delivery of new employment development;
- it does not (in Policy LD) actively support the provision of new housing in conjunction with existing and new economic development opportunities;
- it falls short (in Policy HS) of planning for acknowledged housing needs (as acknowledged by paragraph 6.1.3);

- it does not properly assess (and identify) opportunities to include new development which can enhance the natural environment and improve biodiversity;
  - it does not (within Policy REN) actively seek to promote a low carbon economy. In particular, the policy approach adopted fails to support the provision of new development in close proximity to and in conjunction with renewable energy schemes.
- 1.10 Added to this, paragraph 14 (of the NPPF) introduces an unequivocal “presumption in favour of sustainable development” which should be seen as “a golden thread running through both plan making and decision taking”. Paragraph 14 of the NPPF makes it clear that for plan-making, local planning authorities should “positively seek opportunities to meet the development needs of their area” and include sufficient flexibility to adapt to rapid change.
- 1.11 However, it is ZBV’s view that the Core Strategy (as currently drafted) fails to appropriately reflect this requirement. In particular:
- Policy LD (General Location of Development) is based on a hierarchy which is more reflective of settlement size, rather than the opportunity for promoting sustainable development (i.e. access to jobs, access to public transport, access to renewable energy sources, etc);
  - Furthermore, Policy LD (and the Core Strategy as a whole) fails to promote opportunities to locate new development in or close to the District’s major employment sites/locations (i.e. Dorset Green Technology Park and Holton Heath) – as recommended by the Government Office for the South West (in their letter to the Council dated 23/11/09);
  - Whilst the ‘Vision for Purbeck’ (Section 4.2) seeks to support sustainable design, it falls short of including a clear ‘presumption in favour of sustainable development’. Additionally, it does not recognise the opportunity to make existing settlements more sustainable via new development;

- There is an over-dependence within the Core Strategy on the ‘preparation of subsequent plans’ (particularly in relation to new employment development and housing delivery). This not only creates uncertainty in terms of delivery of sustainable development, but also makes it difficult to assess (with confidence) whether the Council’s overall strategy will meet the ‘presumption in favour of sustainable development’.

1.12 In ZBV’s view, it will be necessary to significantly update the Core Strategy to address the above points. In particular, Policy LD should be re-drafted to reflect paragraph 14 of the NPPF and incorporate a presumption in favour of sustainable development. Furthermore, Council policy should look to locate new housing in conjunction with new/existing employment opportunities and sites.

#### Core Planning Principles

1.13 Paragraph 17 of the NPPF outlines the twelve core land-use planning principles which should underpin both plan-making and decision-taking. In ZBV’s view, there are conflicts/inconsistencies between the Core Strategy and the identified core planning principles – in short:

- the identification of the Borough’s major employment sites (Dorset Green Technology Park and Holton Heath) as falling within the Countryside (and thereby assessed under Policy CO) is not practical and means that future development in these locations is uncertain (thereby failing the test of “predictability and efficiency”);
- for reasons explained above (and set out later in our representation), the Core Strategy (Policies LD, HS and ELS) fails to promote and support “sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs”;
- similarly, the Council does not appear to have made “every effort” to objectively identify and then meet housing, business and other development needs of an area, and respond positively to wider

opportunities for growth (i.e. the Council has not acted on the recommendations of their study entitled 'Implications of Additional Growth Scenarios for European Protected Sites – Sept 2010', and the opportunity to deliver 1,000 new homes in and around Wool and at Dorset Green Technology Park);

- in order to support the transition towards a low carbon future the Council should also be looking to focus new development close to existing/proposed renewable energy sources (which can provide heat and power for new development);
- the Council has not made it clear (at present) whether the current site allocations 'prefer land of lesser environmental quality'. In particular, it appears that the Council is reliant upon sites located within the Green Belt to deliver housing growth, whereas some brownfield sites/opportunities have not been considered;
- the Core Strategy does not include a policy presumption in support of the 'effective use of land' by 'reusing land that has been previously developed (brownfield land)';
- the Core Strategy does not explicitly promote mixed-use developments (a key strand in achieving sustainable development). Indeed, the proposed distribution of housing (set out in Policy HS) does not take into account existing/proposed employment locations and opportunities;
- the Council's 'Spatial Distribution of Development' policies do not, in ZBV's view, "actively manage growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable". In particular, the failure of Policy SW to support/promote any new development in and around Wool (which exhibits and number of sustainability credentials – including main-line rail access) is considered to be a significant failing of the plan.

## Building a Strong, Competitive Economy

- 1.14 The National Planning Policy Framework (NPPF) encourages local planning authorities to proactively secure economic growth (paragraph 18) and states that “significant weight should be placed on the need to support economic growth through the planning system” (paragraph 19). Paragraph 20 also advises local planning authorities to “plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century”.
- 1.15 The NPPF makes it clear (in paragraph 21) that Local Plans should “recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing”. The paragraph then goes on to set a series of criteria which local planning authorities should take into account when drawing up local plans, including:
- setting out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
  - setting criteria, or identifying strategic sites for local inward investment to match the strategy and meet anticipated need over the plan period;
  - supporting existing business sectors – and identifying and planning for new or emerging sectors likely to locate in an area;
  - planning positively for the location, promotion and expansion of clusters and networks of knowledge driven, creative or high technology industries;
  - identifying priority areas for economic regeneration, infrastructure improvement and environmental enhancement; and
  - facilitating flexible working practices such as the integration of residential and commercial uses within the same unit.
- 1.16 ZBV is concerned that Policy ELS (which has undergone significant re-drafting through the consultation process) fails to properly set out or define a clear economic vision or strategy for Purbeck. Indeed, the deletion of all reference to potential employment sites to accommodate new growth from Policy ELS and the reliance on the completion of a further Employment Land Review

Stage 3 (at a later and undefined date) to assess options to accommodate growth and allocate sites, demonstrably fails to meet the requirements of NPPF paragraph 21 (above).

- 1.17 Similarly, the exclusion of Purbeck’s strategic employment sites (Dorset Green Technology Park and Holton Heath) from the settlement hierarchy (in Policy LD) and their designation as Countryside (under Policy CO) has created further uncertainty and it is entirely unclear how future employment growth will be considered at these principal employment locations. Again this demonstrably fails to meet the ‘plan positively’ requirements set out within the NPPF.
- 1.18 Furthermore, as noted within our previous representations, it is not clear to what extent the opportunity to accommodate employment growth in conjunction with housing growth has been explored and assessed through the preparation of the Core Strategy. For instance, the strategic housing sites identified within the Core Strategy do not appear to be well related or well linked to existing and proposed employment opportunities. Hence, a key opportunity to deliver ‘sustainable development’ appears to have been missed.
- 1.19 In order to meet the requirements of the NPPF, ZBV urge the Council to undertake their Employment Land Review as a matter of urgency (and delay the adoption of the Core Strategy until this important work is complete). Following this, the Council should clearly set out an economic vision for Purbeck (based on a credible evidence base) within Policy ELS and identify those areas where new economic growth will be directed. Furthermore, Policy should also provide explicit support for new development at Dorset Green Technology Park and Holton Heath – and properly investigate opportunities to link housing and employment growth.
- 1.20 In ZBV’s view, the Core Strategy cannot be considered sound (and consistent with the NPPF) until the above work has been completed.

## Delivering a wide choice of high quality homes

1.21 The NPPF states (in paragraph 47) that local planning authorities should seek “to boost significantly the supply of housing” and identifies a number of criteria which should be adopted to achieve this goal. ZBV is concerned that the Purbeck Core Strategy (as currently drafted) fails to meet the Government’s requirements – in particular:

- the Core Strategy acknowledges that there is a critical need to deliver new housing within the District. However, the housing target identified in the Core Strategy (2,400 homes to be provided between 2006-2026, with a further 120 dwellings in 2026/27) is significantly lower than Government’s own housing growth projections (2009), which identified a need for 4,000 dwellings (over the same period), and those housing targets previously included within the proposed changes to the South West RSS (July 2008), which targeted the provision of 5,150 new homes in Purbeck;
- it is apparent that the Core Strategy has not sought to accommodate the previous Government or RSS housing need targets – and the Council has not produced any evidence to demonstrate why the higher housing targets have not been adopted. Rather, the Council simply states in paragraph 6.1.2 that “meeting these higher level growth needs is extremely difficult”;
- we are aware (from discussions with the Council) that the major constraint on housing growth within Purbeck is the presence and extent of protected Heathland and other sensitive environmental designations. The Council did undertake an assessment (entitled: *‘Implications of Additional Growth Scenarios for European Protected Sites’*- Sept 2010) which cautiously suggested that up to 1,000 new homes could be accommodated in and around Wool. Notwithstanding this, the Council did not, in our view, properly and robustly explore this option further (due to other ‘planning reasons’ – including the failure of the RSS to reference

Dorset Green Technology Park as a strategic opportunity to deliver employment growth);

- this decision also ignores the clear fact that Wool (and the surrounding area) emanates a number of opportunities for sustainable development – including a main-line rail service, an existing strategic employment site (with opportunity for further growth), the close proximity of a consented low carbon energy facility (at the DGTP site) with the opportunity to provide ‘green’ heat and power to new developed; the presence of existing social and community infrastructure and local services; and the availability of previously development (brownfield) sites. As a result, the Council has not properly explored the opportunity for promoting sustainable development by linking new economic growth to housing growth (a key objective of the NPPF – and a matter brought to the Council’s attention by GoSW during the consultation on the draft Core Strategy);
- as a result, it is apparent that the Core Strategy fails to meet projected housing needs (by some distance) and the Council has not acted upon its own evidence base, which suggests that there is the opportunity to accommodate additional housing growth in and around Wool. The Core Strategy cannot therefore be considered to accord with national policy in the NPPF at paragraph 47 “to boost significantly the supply of housing” and at paragraph 156 by failing to include strategic policies to deliver “the homes and jobs needed in the area”.

1.22 ZBV has, throughout their other representations, highlighted a number of other areas where the Core Strategy is considered to fall short of meeting the NPPF Policy, particularly on housing delivery. We summarise the main points below:

- the housing evidence base for the Core Strategy is contained in the 2008 SHMA and its 2011 update, which are considered to be robust and up-to-date. Both clearly signal a need for significant numbers of new homes (market and affordable) throughout the plan period. The Core Strategy policies fail to meet these housing needs;

- the Council has failed to explain why those additional 2,750 units identified within the RSS (originally allocated to the Lytchett Minster area) could not be delivered elsewhere within Purbeck;
- paragraph 52 of the NPPF states that “the supply of new homes can sometimes be best achieved through larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities”. However, the Council has not included (or properly assessed) any larger strategic, previously developed opportunity sites (particularly Dorset Green Technology Park). Indeed, the Council has instead sought to remove/delete these opportunities – and is instead relying on the delivery of a small number of medium sized housing sites, and is dependent upon a significant number of units from (undefined) ‘character area potential’.
- added to this, the Council’s approach indicates a tenuous five year housing land supply of 635 dwellings (comprised of existing commitments that must be delivered in full). This represents only 5.78 years supply when measured against the Council’s own ‘reduced’ housing target (in Policy HS), but only 2.17 years of land supply when measured against the RSS target. This position is contrary to paragraph 47 and 159 of the NPPF – and will fail to meet identified housing needs identified by the SHMA;
- whilst the Council’s Strategic Housing Land Availability Assessment suggests that there is an identified potential housing land supply in the District capable of accommodating 7,973 dwellings, the analysis completed and conclusions reached are entirely unclear. For instance, the SHLAA states that sites which comprise the longer-term supply are all outside, but well related to settlement boundaries or have a potential to meet broad locations. However, there is no delineation between the 6-10 year and 10+ year time-periods, nor is there an indication as to which sites are more appropriate than others. Overall, ZBV consider the SHLAA to be deficient in its analysis of potential housing sites and the level of housing land supply resulting;
- the Council’s housing trajectory is dependent upon current commitments being delivered in full and the proposed settlement extensions receiving

planning permissions in 2012 to enable an on-site start in 2013 (with meaningful levels of completion secured in the same year). Added to this, it does not appear that suitable 'healthland' mitigation has been identified in the Core Strategy (and supporting documents) for all the proposed housing allocations. As a result, there is a real concern that the Council's housing trajectory will not be realised and that there is considered to be genuine doubt over the supply of 'deliverable' sites;

- neither Policy HS nor the housing trajectory provide any realistic flexibility or contingency within them to secure alternative sites, phasing or delivery programmes for future housing growth. They are rigid and prescriptive in terms of location, phasing and anticipation of the full delivery of all housing prescribed to each strategic (and yet to be identified non-strategic) site. Neither the policy nor the trajectory commit to any additional dwellings above the Core Strategy's target (which ZBV consider is far below the level required to meet housing needs). ZBV suggest this is unrealistic of developer expectations and market realities.

1.23 Taken together, the Draft Core Strategy's failure to accord with the housing need established in the Regional Spatial Strategy and within current demographic household forecasts; the lack of certainty and flexibility in the housing trajectory; and the flawed approach contained within the SHLAA and Character Area Potential analyses raises considerable concerns that the future housing supply will not be achieved as envisaged in the Core Strategy.

1.24 At a strategic level therefore ZBV conclude that the housing policies of the Core Strategy are not consistent with the NPPF; are deficient in terms of the total quantum of housing proposed; the level of affordable housing to be delivered; and the lack of a more comprehensive assessment of alternative options.

1.25 It is ZBV's view that the Core Strategy cannot be considered sound, until these critical matters are robustly addressed.

## Other NPPF considerations

1.26 There are a number of other areas where the Core Strategy is considered to be inconsistent with the policy framework set out in the NPPF, we summarise these areas below:

- the Spatial Distribution of Development Policies (Chapter 7) does not appear to reflect paragraph 17 and paragraphs 37-38 (of the NPPF) which promote mixed-use developments and locating large-scale residential development in conjunction with other uses so that “people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other uses”. In particular, the Core Strategy does not proactively seek to link employment and residential growth (at locations such as Dorset Green Technology Park) – and thereby maximise the opportunities for reducing trips and journey times;
- Policy D (of the Core Strategy) should be re-drafted to reflect Section 7 of the NPPF – which states that planning policies should ensure that developments: function well and add to the quality of the area; establish a strong sense of place; optimise the potential of sites to accommodate development (including creating and sustaining an appropriate mix of uses, support facilities and transport networks); respond to local character and history, whilst not preventing or discouraging appropriate innovation; create safe and accessible environments; and are visually attractive as a result of good architecture. Added to this, paragraph 63 makes it clear that in determining applications, “great weight should be given to outstanding or innovative design”. Again, this requirement should be reflected in Policy D;
- whilst Policy REN seeks to encourage sustainable use and generation of energy, it now requires further re-drafting to reflect the requirements of paragraph 97. In particular, Policy REN should: be based on a positive strategy to promote energy from renewable/low carbon sources (note: this appears to be absent at present); identify suitable areas for renewable and low carbon energy sources; and identify opportunities

where development can draw its supply from de-centralised, renewable or low carbon energy supply systems. In particular, Policy REN should support the opportunity to locate new development around the consented low carbon energy facility at Dorset green Technology Park.