

Purbeck District Council Core Strategy Examination in Public

Hearing Statement
on behalf of Ashvilla Estates (Wareham) Ltd
(Respondent Reference 2799)

Matter 2: General Location of Development (Policy LD)

April 2012

Purbeck District Council Core Strategy

Examination in Public

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(Respondent Reference: 2799)**

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1.0 INTRODUCTION

- 1.1 This Statement is submitted on behalf of Ashvilla Estates (Wareham) Ltd to Matter 2 (General Location of Development (Policy LD)) of the Examination in Public into the Purbeck District Core Strategy Examination in Public. Ashvilla Estates (Wareham) Ltd are the promoters of strategic residential led development of land to the West of Wareham.
- 1.2 This Statement is specifically intended to respond to the Inspector's questions and set out Ashvilla Estates (Wareham) Ltd case on matters of soundness.

2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Issue: 2.1: What evidence led to the inclusion of each of the settlements within each category? Does the sustainability appraisal support the chosen hierarchy?

2.1.1 We agree that it is appropriate to focus development at the most sustainable settlements within the District. In addition, we also consider that the Core Strategy is right to identify that Wareham is one of the most sustainable locations for focusing new development within Purbeck District. The settlement hierarchy should reflect the direction of growth. The evidence for the settlement hierarchy is contained in CD36.

2.1.2 However, we question the justification to place Upton alongside Wareham and Swanage in the settlement hierarchy. Two thirds of Upton lies within 400m of protected heath land where no new residential development is allowed.

2.1.3 Upton is identified¹ as having only 17 community services and facilities compared with 27 and 26 in Wareham and Swanage respectively. For example Corfe Castle has a higher number of facilities and yet is classed as a Key Service Village. Upton is identified in the Background Paper as being "severely constrained in terms of absolute constraints (heathland, tidal flooding), as well as being surrounded by Greenbelt." As such the hierarchy should be modified to place Upton below Wareham and Swanage. It is accepted that Upton in terms of population is similar to Wareham and Swanage but it does not have the same range of facilities and hence is less sustainable as a locality. This should be related in the hierarchy.

2.1.4 The Core Strategy is therefore unsound in terms of justification in terms of a lack of robust evidence as it seeks to elevate the status of Upton in terms of settlement hierarchy as a location to direct development in the most sustainable locations, in spite of the Council's own evidence of the constrained nature of Upton.

2.1.5 Moreover the policy should be modified to state that new development should be concentrated within and adjoining the settlement boundary of towns to ensure that it reflects other policies and the spatial vision of the Core Strategy.

2.1.6 We propose that Upton is moved to become a second tier settlement in the hierarchy and insert additional text to state new development should be concentrated within "and adjoining" the settlement boundary of the Towns.

¹ CD36

Issue 2.2: Is the apportionment of growth between the settlements properly justified? Why are no settlement extensions proposed at Corfe Castle, Sandford and Wool which are all identified as key service villages?

2.2.1 The settlement hierarchy fails to provide sufficient focus to Wareham and Swanage in terms of the distribution of development. The evidence is of an overwhelming case for new homes to meet local need. The Core Strategy must reflect the evidence of demographic, housing and economic need as well as reflecting the infrastructure and environmental carrying capacity of the housing market area. Too much emphasis has been placed on the weight given to environmental constraints, including AONB. This is made in spite of the profound weight of evidence relating to economic and social need, the jobs to homes balance, as well as sustaining rural market towns in the hinterland of the conurbation.

2.2.2 In particular, Wareham, the dominant market town in Purbeck, with a variety of services and facilities, located on the Weymouth-Poole railway line is the most suitable location for new planned development, providing an opportunity to seek to reduce reliance on car-borne journeys and to reinforce the long term sustainability and viability of Wareham as a key market town. A solution within the District is essential to meet the basic needs of the population in terms of providing housing and in sustaining the local economy.

2.2.3 Notwithstanding the evidence of the need for higher housing provision than that provided for by the 2,520 homes in the Submission Core Strategy, the Council proposes only 420 of the proposed 1,410 additional homes (taking into account 830 completions and 280 commitments in the period 2006 to 2011) in Central Purbeck (which includes Wareham). The former Government Office for the South West² advised in relation to the Preferred Option Consultation that:

“Given Wareham’s central location in the district, it would appear to provide the best accessibility for the whole of the district for the provision of higher order services...Having a large proportion of the new housing proposed for rural Purbeck concentrated at Wareham, would therefore seem the most appropriate location in terms of reducing the need to travel through choice of location...

...As in sustainable travel/creating sustainable communities terms concentrating growth at Wareham would seem to be substantially preferable, reasons to

² CD100

outweigh this consideration would need to raise even greater sustainability concerns. It would therefore seem necessary to explore further whether and how a more substantial extension to Wareham could be accommodated at Wareham."

- 2.2.4 Therefore the Council's proposal to accommodate only 30% of the remaining housing requirement at Central Purbeck is inadequate and demonstrates the imbalance in the Council's approach.
- 2.2.5 The basis for apportionment of growth within Purbeck is in part derived from predictions made by Footprint Ecology³ on the relative effects of development under different growth scenarios, the results of which are set out in the series of HRA⁴ Reports. Footprint Ecology use a model based on postcode data, developed for the Dorset authorities, to predict the additional number of visitors at specific heathland access points, based on distances between postcode areas and access points to heaths.
- 2.2.6 It is crucial to note that this assignment of additional visitors was made without mitigation measures being in place. The HRA then suggested that all options will need mitigation, to avoid likely adverse effects alone or in combination; and that such measures should be an integral part of the Core Strategy.
- 2.2.7 Since Avoidance measures are essential for any development, the strategic ecological advantage of any growth scenario and its contribution to increased visitor numbers to the heaths will actually depend on the net mitigated effects of development. It is therefore essential to consider the actual potential of the mitigation measures that might accompany any growth scenario before adopting a growth strategy.
- 2.2.8 The apportionment of growth in Purbeck has therefore not been properly justified because it has been based in part on information that has not adequately considered the mitigation measures that could be delivered at various locations proposed for growth and the strategic benefits that such mitigation might offer in alleviating the existing baseline of recreational pressure on the European Sites.
- 2.2.9 The Footprint Ecology report⁵ does not purport to be a Habitat Regulations Assessment *per se*, but is said to 'sit alongside' the HRA. This document states that:

³ CD112

⁴ Habitat Regulations Assessment SD6 & SD16

⁵ CD112

“The heaths around Wareham are particularly vulnerable and the options for alternative sites are very limited; we cannot see how alternative space could be secured to successfully divert access here.”

2.2.10 A higher level of growth in Wareham has therefore been clearly, and erroneously, ruled out on the basis that Footprint considers that suitable alternative sites do not exist to mitigate the effects of such development.

2.2.11 The potential for the substantial area of land under the control of Ashvilla Estates (Wareham) Ltd to the west of Wareham to deliver a Suitable Accessible Natural Greenspace (SANG) to mitigate the effects of growth in Central Purbeck has been persistently ignored.

2.2.12 The apportionment of growth has therefore not been based on the most robust evidence base and an inadequate consideration of potential heathland mitigation sites.

2.2.13 In fact, as detailed in our statement to matter 14, a very substantial SANG in excess of 90ha can be delivered on arable and pasture land to the west of the bypass at Wareham. This area greatly exceeds the size of SANGs identified in the Heathland SPD 2012-14, and commended as ‘large’, at Upton. An extensive Country Park style of SANG, with expansive views across Purbeck, would be able to mitigate the effects of development of 200 houses at Worgret Road as well as substantial additional development (at least 700 homes at West Wareham) to respond to the level of housing need and the objective of securing sustainable development in Wareham.

2.2.14 It should be particularly noted that such a SANG close to a large settlement has a very high potential to divert existing users of heathland conservation sites, and is therefore extremely efficient form of mitigation. Wareham should be the focus for sustainable development and the Core Strategy.

Issue 2.3: Have the proposed amendments to the green belt boundary been properly justified and has the Council's approach heeded national guidance? What are the exceptional circumstances that exist to justify such revisions? Has sufficient consideration been given to opportunities for development within urban areas and on other sites beyond the green belt?

2.3.1 Paragraphs 79-92 of the NPPF now provide national policy guidance on Green Belts. The five purposes of Green Belt are retained by the NPPF.⁶ Once established Green Belt boundaries **"should only be altered in exceptional circumstances"**⁷. If LPAs are considering amendments to boundaries they must have regard to their intended permanence in the longer term: beyond the plan period: in this case beyond 2027. It is important to account for the need to promote sustainable patterns of development⁸ to avoid the consequences of channelling development towards locations beyond the outer Green Belt boundary: often referred to as leapfrogging.

2.3.2 Whilst accommodation of proposed site allocations necessitates revisions to the Green Belt boundary, including the proposed allocation at Worgret Road, Wareham and this is set out in the Green Belt Review⁹, concern is raised with regard to other changes to the Green Belt boundary to add additional land within the Green Belt in locations which either do not fulfil the reasons for inclusion within the Green Belt nor take account of the need to promote sustainable development in the longer term. As an example, specific concern has been raised by Ashvilla Estates (Wareham) Ltd in our representations to the Green Belt review and the Core Strategy in respect of a proposed extension of the Green belt boundary shown on Map 5¹⁰, land north of Worgret Road and west of the by-pass. The explanation given on Map 17¹¹ is that the revised boundary will use roads and forest boundary and **"would reinforce the function of the Green Belt in preventing a westward sprawl of the town, it would also allow it to align with a more recognisable landline, i.e. the road."**

2.3.3 Exceptional circumstances simply do not exist to require additional land west of Wareham to be added to the Green Belt and the rationale given above. Paragraph 7.2.2 (i) of CD127 states that **"the unrestricted sprawl of Wareham would still be prevented by the gap retained between Wareham and North Wareham, which is also flood plain. The by-pass would prevent any westward sprawl of the settlement."**

⁶ NPPF Paragraph 80

⁷ NPPF Paragraph 83

⁸ NPPF Paragraph 84

⁹ CD127 Purbeck Green Belt Review January 2012

¹⁰ CD127 page 23

2.3.4 This matter is addressed in full detail in terms of the Central Purbeck session in our Hearing Statement to Matter 14, Issue 14.2 and is not repeated here.

Issue 2.4: Paragraph 83 of the National Planning Policy Framework refers to the permanence of the green belt in the long-term so that they should be capable of enduring beyond the plan period and paragraph 85 refers to the identification of safeguarded land. How does the Core Strategy address the possible need to safeguard land? Should a review of the complete green belt boundary have been undertaken?

2.4.1 As indicated in response to issue 2.3 above, no account has been taken to ensure that Green Belt boundaries will not need to be altered again at the end of the plan period. The Council has sought to release parts of the Green belt to accommodate development but otherwise retain Green Belt tightly drawn around existing settlements. There would have been value in considering safeguarding of land in accordance with NPPF paragraph 85 rather than retain Green Belt tightly drawn around settlements.

Issue 2.5: How and when will settlement boundaries be reviewed?

2.5.1 The Council has sought to address this through its response to the Inspector's question 3. The position is not at all clear to planning professionals let alone members of the public and we strongly suggest that the Council should expand upon their response to question 3 to produce a draft Proposals Map to a legible scale (using the information contained in Appendix 4 of the Submission Core Strategy) such that all parties can be clear on the spatial/mapped policy designations which will be in place at the point of adoption of the Core Strategy.

Issue 2.6: Bearing in mind the environmental constraints within the District is there sufficient flexibility within policy LD to ensure that the formulation of the 'subsequent plans' is not unduly constrained?

2.6.1 No there is insufficient flexibility in the policy as drafted which only modifies settlement boundaries to accommodate currently defined extensions. The policy should be modified to state that new development should be concentrated within and adjoining the settlement boundary of towns to ensure that it reflects other policies and the spatial vision of the Core Strategy.

¹¹ CD127 page 51