



**Purbeck Core Strategy  
Examination in Public**

**Issues for Discussion**

**General Location of Development**

**Written Representations on behalf of  
Imerys Minerals Ltd.**

**April 2012**

## 1.0 INTRODUCTION

1.1 This statement comprises a written representation response to the issues identified by the Inspector in the Examination in Public (EIP) of the Purbeck Core Strategy (CS). It is prepared by Peter Atfield B.Tp MRTPI on behalf of Imerys Minerals Ltd. (Imerys). Mr. Atfield's qualifications and experience is set out in **Appendix 1** to this statement.

1.2 Specifically, this submission deals with Matters 1, 2, 4, 5, 11 & 14 in so far as they are relevant to the consideration the potential residential development (as sought in previous representations) of land owned by Imerys at Steppingstone Fields, West Lane, Stoborough. The land currently comprises grassed fields with hedgerows to the boundaries. The site is identified on the plan at **Appendix 2**. This plan also shows a suggested revised settlement boundary allowing for the allocation of the land as an urban extension.

## 2.0 MATTER 2: GENERAL LOCATION OF DEVELOPMENT (POLICY LD).

2.1 We make no specific comment in respect of *Issues 2.1 and 2.2*. These are primarily matters for the council to address. We therefore commence by responding to *Issue 2.3*; and the proposed amendments to the green belt boundary. These are proposed at Upton, Wareham and Lytchett Matravers.

2.2 We have already commented that the proposed urban extension at Upton fulfils, in the main, housing needs arising from the adjacent Borough of Poole. An amendment to the green belt boundary is required for this purpose. This seems to lack justification in the context of addressing the overall housing needs of Purbeck, including market housing.

2.3 At Lytchett Matravers, the proposed amendment to the green belt boundary facilitates the creation of an urban extension in a location that is relatively remote and situated in the extreme northernmost part of the district. The construction of new housing here will attract residents that work in the nearby Borough of Poole (10 kilometres distant), as well as Blandford Forum

(13 kilometres distant) - in North Dorset District. Again, the amendment to the green belt boundary here will potentially assist in meeting the open market housing needs of adjoining administrative areas.

- 2.4 The NPPF sets out guidance, in Paragraph 82, on the exceptional circumstances where an amendment to the green belt boundary is justified. The example given is that development should be large in scale; new settlements or major urban extensions. The Upton and Lytchett Matravers sites fall in neither category. They are small; comprising 70 and 50 dwelling allocations respectively. They fail to meet this NPPF guidance.
- 2.5 If the CS is found to be unsound on this point, and we believe that it is, then a total of 120 dwellings need to be found from other suitable sites beyond the green belt. It is our submission that the Imerys land at Steppingstones Fields can contribute to meeting this shortfall. This is stated in the context of our overall position, that the CS is already failing to meet the identified strategic housing needs of the district; and that additional sites need to be identified to meet that need.
- 2.6 *Issues 2.3* asks whether sufficient consideration has been given to opportunities for development within urban areas and on other sites beyond the green belt. We believe that the CS has been based primarily on evidence that has considered, in detail, sites within the existing urban areas. The Strategic Housing Land Availability Assessment (SHLAA) process has been exhaustive in looking at the capacity of the development potential of all submitted sites within settlement boundaries. This is confirmed in the CS Background Paper Volume 5: Housing (see Paragraph 4.8.5).
- 2.7 The same cannot be said of sites beyond existing settlement boundaries. In respect of these sites, the SHLAA process has only informed the formulation of the CS following the establishment of the settlement strategy. In other words there has been no assessment, in detail, of the ability of sites beyond existing settlement boundaries to deliver a quantum of housing because; (1) the existing urban extensions are regarded as sound and (2) all identified SHLAA 'infill' (or windfall) sites will be developed. This approach is not sound.

- 2.8 Whilst the background evidence has looked at urban extensions at the larger settlements, additional development at Local Service Villages has not been investigated. It is submitted that this should be undertaken, with Stoborough being a typical example of a settlement capable of accommodating more growth. It is within a walking and easy cycling distance from Wareham, less than 1.5 kilometres away. It is situated on a principal bus route, with Route 40 of the Wilts & Dorset bus company providing regular services to Wareham, Swanage and Poole.
- 2.9 On *Issue 2.4*, we have no detailed comments to make in respect of green belt boundaries. However, it is worth noting that much of Purbeck District is situated beyond the green belt. Settlement extensions in certain key villages, such as Stoborough, would not need to be tested against the advice set out in Paragraphs 83 and 85 of the NPPF.
- 2.10 *Issue 2.5* questions how and when settlement boundaries should be reviewed. We consider that at Local Service Villages, the settlement boundaries should be reviewed as part of the CS process. To defer a review to a later date - and in this instance the Site Allocations DPD has no definite programme - results in uncertainty over how some settlements will develop in the future, and whether local services will be supported in the short and medium term.
- 2.11 In respect of *Issue 2.6*, Policy LD introduces ambiguity into how settlements may develop in the future. It states that new development should be concentrated within settlement boundaries, but then states that the boundaries will be reviewed through the preparation of the Site Allocations Plan. We consider that greater flexibility would be introduced into the policy if the reference to concentrating development within settlement boundaries is only applied to the 'Other Village' categories.

# APPENDIX 1

## Qualifications & Experience

This EIP statement is submitted by Peter Atfield, B.Tp MRTPI. I hold a degree in town planning from what is now known as the University of the South Bank, London. I am a member of the Royal Town Planning Institute, having been elected in November 1984. Prior to that date I spent 10 years training and practicing in public service, holding positions as a Planning Technician, Planning Assistant (Design & Conservation) and Planning Assistant (Countryside Policy and Projects).

I am now an Executive Employee and hold the position of Director of Planning, Goadsby Survey and Valuation Ltd. (a trading subsidiary of the Goadsby Group of Companies), having been employed by them for 28 years. I advise the firm and its' clients on a range of planning policy, development control and enforcement matters across Central Southern and South West England; but principally in Dorset, South Wiltshire and South Hampshire. In addition to my employment, I contribute voluntarily to some background work to assist in the formulation of local planning policy and practice. This includes my role as an external advisor to the South East Dorset Strategic Housing Land Availability Assessment Panel. I have also provided input to emerging Community Infrastructure Levy policies and charging schedules in Dorset.

My planning caseload comprises residential, commercial and leisure development. My principal clients include Barratt David Wilson, Christchurch Borough Council, Forrelle Estates, Hall & Woodhouse Ltd., Imerys Minerals Ltd., Libra Homes, Licet Holdings / NCP, London & Henley Group, Network Rail (Infrastructure) Ltd., Newsquest Southern, Persimmon Homes (South Coast) Ltd., The Royal Bournemouth & Christchurch Hospitals NHS Foundation Trust, Seaward Properties, Sembcorp Bournemouth Water and Shorefield Holidays.

## **APPENDIX 2**

### Site and Suggested Settlement Boundary

