



## **Purbeck Core Strategy Development Plan Document**

### **Examination into the soundness of the plan**

#### **Statement on behalf of Purbeck District Council**

**Hearing date: Tuesday 8 May 2012 – 2pm**

#### **Matter 2: General Location of Development (Policy LD)**

##### **Issues**

- 2.1 What evidence led to the inclusion of each of the settlements within each category? Does the sustainability appraisal support the chosen hierarchy?
- 2.2 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?
- 2.3 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?
- 2.4 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?
- 2.5 How and when will settlement boundaries be reviewed?
- 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?

## Introduction

1. This statement considers all the issues within Matter 2: General Location of Development (Policy LD).

## Statements of common ground

2. No Statements of Common Ground have been submitted in relation to this Matter.

## Why the Council considers the core strategy sound

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

<p><b>2.1 What evidence led to the inclusion of each of the settlements within each category? Does the sustainability appraisal support the chosen hierarchy?</b></p>
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4. In gathering evidence to inform the early stages of Core Strategy preparation, the Council produced a number of background papers. Background Paper 10<sup>1</sup> sets out a settlement strategy for the District and provides the evidence underpinning Policy LD: General Location of Development. The settlement strategy includes three areas of review – community facilities, spatial areas and settlements.
5. The community facilities and services review identifies provision in each of the District's settlements, notes where provision may be lacking, and provides a ranking of settlements according to the level of provision. Each of the District's settlements with five or more facilities are ranked according to the level of provision (5+, 10+, 15+, 20+ and 25+ facilities). Settlements with more than 5 facilities are considered further through the settlement review. Settlements with fewer than 5 facilities are not considered further due to their low level of facility provision.
6. The spatial area review examines the relationship between each of the settlements and their surrounding areas. It identifies five distinctive but overlapping spatial areas within the District – North West, North East, Central, South West and South East.
7. The settlement review examines population data and the results of the community facility review. It ranks each settlement with 5 or more facilities according to five tiers of facility provision. Each settlement within tiers 1 – 4 (10 or more facilities) is examined in more detail, in particular its role as a supporting settlement (hub) and in providing important facilities and services to surrounding settlements, for example, a school and / or doctors' surgery. The settlements identified as having a role as a hub and providing important facilities are classified as; a Town, Key Service Village or Local Service Village according to their role, function and level of facility and service provision.
8. The recommendations of the settlement strategy direct development towards the most sustainable settlements that have the widest range of facilities and services. Wareham and Swanage are identified as the settlements that should be the focus of the bulk of development due to their roles as market and coastal towns (Regional Spatial Strategy (RSS) Development Policy B settlements). Upton is identified as a more constrained settlement with some additional development recommended. The recommendation also takes into account Upton's proximity to the conurbation of

<sup>1</sup> CD36: Volume 10: Settlement Strategy

Poole and Bournemouth (RSS Strategically Significant Cities and Towns and Development Policy A settlement).

9. Villages with the highest level of facilities and population which act as a hub to surrounding settlements and reduce the need to travel are considered to be 'Key Service Villages' (RSS Development Policy C settlements). These villages are identified for the focus of rural development – Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford and Wool. Villages with a few key and important facilities which also act as a hub are considered to be 'Local Service Villages' (RSS Development Policy C settlements). These villages are identified as needing some growth to sustain vital rural services which could support some additional small-scale development – Langton Matravers, Stoborough, West Lulworth and Winfrith Newburgh. All other villages are considered by the Council as unsuitable for development and removal of their settlement boundaries was proposed in the Core Strategy Preferred Options 2009<sup>2</sup>. In each of the towns, key service villages and local service villages, the Core Strategy Preferred Options proposed a review of settlement boundaries for development management purposes.
10. In response to the Planning Purbeck's Future consultation in autumn 2009, a number of parish councils raised concerns that their smaller settlements would be unable to accommodate small scale development due to the restrictive nature of the hierarchy in the settlement strategy. In response, the Council amended Policy LD: General Location of Development to include two further tiers of rural settlements. The hierarchy now includes 'other villages with a settlement boundary' within which some small scale development would be considered appropriate. Areas and settlements without settlement boundaries are classed as countryside where development is only considered suitable in exceptional circumstances as set out in Policy CO: Countryside.
11. The Sustainability Appraisal (SA)<sup>3</sup> notes that the proposed hierarchy is expected to generate positive effects. This is due to the focus of new development in towns and key service villages which will support the viability of new and future service and facility provision and ensure accessibility for prospective residents. No negative effects or mitigation measures are identified.

**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?**

12. The NPPF sets a presumption in favour of sustainable development. Policy LD: General Location of Development and the 5 Spatial Area policies provide a clear local policy approach to ensure the delivery of sustainable development across the District whilst fully taking into account local circumstances.
13. The apportionment of growth between the District's settlements is justified by directing higher levels of growth to the most sustainable settlements in accordance with the [previously] emerging RSS and the settlement hierarchy set out in Policy LD: General Location of Development. This approach apportions the highest levels of growth to the Towns of Swanage, Wareham and Upton (RSS Development Policy

<sup>2</sup> CD16: Core Strategy Preferred Options 2009 ('Planning Purbeck's Future')

<sup>3</sup> SD15: Sustainability Appraisal for Proposed Changes to Core Strategy Pre-submission 2011

A and Policy B Settlements) followed by smaller levels of growth at the Key Service Villages (RSS Development Policy C Settlements) in proportion to settlement size and function. The level of apportionment between settlements also takes into account the support and provision of services and facilities, retail and employment, open space and recreation and environmental constraints.

14. Background Paper 4<sup>4</sup> sets out 9 development options for growth across the District, all of which were considered to be reasonable options taking into account the [previously] emerging 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 the most appropriate options to be consulted upon<sup>5</sup>. This included (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.
15. At this stage the other Key Service Villages of Sandford, Bovington and Corfe Castle were not identified by the Council for settlement extensions for varying reasons. There were no sites promoted through Strategic Housing Land Availability Assessment (SHLAA) at Corfe Castle. Bovington is constrained by heathland, had no sites promoted through SHLAA<sup>6</sup> and already had an unimplemented housing allocation for the Ministry of Defence. Sandford is constrained by heathland and also suffers from traffic congestion and the associated impacts of air pollution.
16. Consultation results<sup>7</sup> indicated clear support (67% of responses from an 8% overall response rate) 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.
17. Corfe Castle Parish Council asked for affordable housing to help sustain the local community. Officers approached the local landowners about potential sites. Landowners made it clear that they would only make land available as part of a mixed open market and affordable housing scheme. A further consultation in 2010<sup>8</sup> considered more detailed options for sites in the towns and villages, including the principle of 30 dwellings at Corfe Castle. The consultation results<sup>9</sup> for Corfe Castle were split and included a Parish Council objection as it did not want any open market housing.
18. The Council decided the location of housing and the allocated sites at two Council meetings to agree the Core Strategy Pre-Submission in October 2010. The Council decided not to allocate a food store at Worgret Road, Wareham and instead maximise the amount of housing on the site, which was estimated to be 200 dwellings. The allocation of the 200 dwellings helped to achieve the district housing target of 2,400 dwellings. The Council then decided to delete allocations at Wool (50 dwellings) and Corfe Castle (30 dwellings), as these exceeded the district housing target and did not have support from the respective parish councils. Wool Parish

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<sup>4</sup> CD30: Volume 4: Development Options

<sup>5</sup> CD16: Core Strategy Preferred Options 2009 ('Planning Purbeck's Future')

<sup>6</sup> CD117-118: Strategic Housing Land Availability Assessment Submitted sites: January 2011

<sup>7</sup> CD17c: Responses to development options and supermarket responses

<sup>8</sup> CD21-CD 26: Where shall we build in Purbeck 2012 – 2026

<sup>9</sup> SD8: Summary of Representations to Pre-Submission 2010

Council argued that the local plan allocation at Purbeck Gate, Wool, more than met its share for the 2006-2026 plan period, with delivery from 2006-2012 of approximately 180 dwellings.

**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?**

19. The policies were written to be consistent with PPG2, which has now been deleted. However, this statement will show that the policies are consistent with the National Planning Policy Framework (NPPF), which has superseded the PPG.
20. As explained in 2.1 and 2.2 above, the Council has agreed its housing strategy to ensure that the significant District-wide need for affordable housing is provided for across the District. 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 at Wareham, Upton and Lytchett Matravers in order to provide land for settlement extensions is informed by a comprehensive Green Belt Review<sup>10</sup>. This review has been subject to public consultation, as detailed in 2.4 below.
21. The undertaking of a Green Belt Review in Purbeck was necessary for several reasons. The history relating to Purbeck's green belt designation is complex, with boundaries often being ill-defined to align with parish and plan boundaries, rather than logical boundaries that relate to defensible landlines. Elsewhere, land was 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 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.
22. In summary, the lack of a clear definition of the South East Dorset Green Belt, together with a need to find suitable sites for settlement extensions, are exceptional circumstances that justify a review of the green belt in Purbeck. The Green Belt Review has been carried out in the context of paragraph 80 of the NPPF's five purposes for designating land as green belt and officers have ensured that the proposed revised boundaries accord to logical landlines.

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<sup>10</sup> CD127: Green Belt Review (August 2011)

23. Objectors could argue that development on greenfield (including green belt allocation) sites may reduce infill development within the district's settlements. However, it is important to note that there are no large brownfield sites within Purbeck's settlement boundaries. As a result, the greenbelt designation in Purbeck does not perform the purpose of promoting large scale urban regeneration. As there is not enough infill land within the district's settlement boundaries to meet housing needs, greenfield (including green belt allocation) sites are required to ensure the provision of a 10 year housing land supply.
24. Having regard to other sites beyond the green belt, the Council consulted on options to concentrate development on the edge of other settlements, including settlements located outside of the green belt. However, as explained above, the need for affordable housing is spread District-wide. Clear public support was given to the option of spreading development around the District in accordance with the settlement hierarchy.

**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?**

25. The Council has undertaken a complete review of the green belt. This was consulted upon alongside the Core Strategy in June/July 2010 and was subject to two subsequent revisions (November/December 2010 and September/October 2011) in light of consultation responses.
26. The changes to the green belt at Wareham and Upton bring the boundary in line with the barrier created by the bypasses that run alongside these settlements. These barriers now form a logical and defensible boundary within which future development at the respective settlements can be contained. Any development beyond the bypasses would cause clear harm to the function of the green belt in terms of restricting urban sprawl, retaining openness of character and protecting the wider countryside.
27. In the case of Lytchett Matravers, the Huntick Road allocation will not have the same degree of containment in terms of a physical barrier. However, the extent of the existing urban 'depot' use on the eastern boundary of the allocation forms a logical and defensible boundary for new built development, beyond which the open character of the green belt prevails. There could be a case for identifying land for future settlement expansion to the north of the site that would not harm the function of the green belt in this location. However, this option is outweighed by the level of support from local residents and the Parish Council regarding the amount of development proposed in the village and where it will occur. In response to the 2010 'Where Shall We Build in Upton and Lytchett Matravers 2012-2026?'<sup>11</sup> consultation, Lytchett Matravers Parish Council and 74% of residents supported a settlement extension of 50 dwellings. The Parish Council and 73% of residents did not support the identification of extra land to accommodate 100 dwellings. Therefore, much valued community support would be lost if safeguarded land was identified.

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<sup>11</sup> CD26: Where Shall We Build in Purbeck 2012-2026 Consultation Results (2010)

28. However, should identified green belt settlement extensions not come forward, a further review of the green belt may be required and alternative sites allocated in a subsequent Development Plan Document.
29. Some flexibility for employment growth is offered at Holton Heath industrial estate. Officers have worked closely with developers to ensure that the green belt boundaries are appropriate. There is an opportunity for additional employment development at this location, should market conditions require it later in the plan period.

**2.5 How and when will settlement boundaries be reviewed?**

30. Settlement boundaries will be reviewed through subsequent plans. The Council will review the Swanage settlement boundary through the preparation of the Swanage Area Action Plan (AAP). Work on this plan is commencing in 2012 and is due for completion in 2014. The Council intends to review all other settlement boundaries through the preparation of a Site Allocations Plan. Where the community has expressed an intention to produce a neighbourhood plan, for example at Bere Regis, boundaries will be reviewed through the relevant plan(s).
31. The preparation of the Swanage AAP will enable a set of criteria to be established to ensure a consistent approach to each settlement boundary review undertaken across the District. However, boundaries reviewed through the preparation of a neighbourhood plan may be subject to a local approach.

**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?**

32. One of the key 'subsequent' plans which will deliver a significant amount of housing in the District is the Swanage AAP. The Council has already explored and consulted upon options to deliver the 200 dwellings proposed in Swanage, including two preferred allocations of 100 dwellings each<sup>12</sup>. In terms of the impact on the surrounding landscape and environmental designations, the Area of Outstanding Natural Beauty Partnership and Natural England did not raise any issues of particular concern. There are many options available, within and between land ownerships, to ensure that Suitable Alternative Natural Green Space (SANGS) is deliverable in support of residential allocations in Swanage, thereby ensuring no additional adverse effect on nearby heathland. In addition, supported by Core Strategy Policy SE: South East Purbeck, the Council has recently granted planning permission for up to 52 dwellings (50% affordable) which will support the provision of a free school in Swanage. The permission adds certainty to the delivery of up to a quarter of the town's green field housing allocation requirement.
33. Bere Regis Parish Council has started work on a neighbourhood plan which will identify a site for delivery of the 50 dwellings proposed in the village. Delivery will be subject to the provision of heathland mitigation (SANGS) which should also be considered through the neighbourhood plan. Landowners on the edge of Bere Regis settlement have indicated aspirations to consider options relating to the provision of the housing, school and employment as set out in the Core Strategy.

<sup>12</sup> CD24: Where shall we build in South East Purbeck 2012 – 2026?

34. There is some doubt over the delivery of 40-60 dwellings out of the 200 dwellings proposed at Wareham due to uncertainty surrounding the availability of the Wareham Middle School playing fields as part of the overall allocation. Throughout the preparation of the Core Strategy, other sites to the north of Wareham were subject to consultation. The sites could be reconsidered through the Site Allocations Plan as an alternative location for this level of development. Alternatively, the shortfall could be met through infill development on small sites within the Local Service Villages and other villages with a settlement boundary, sites identified and brought forward for development through neighbourhood plans and / or the provision of rural exception sites.

**Suggested changes for the Inspector to consider**

35. Update as per changes 16 and 17 of the Minor Changes Schedule<sup>13</sup>. In particular, change number 17 includes reference to town centres and local centres for consistency with Policy RP. This change will be consulted on as a modification to the Core Strategy after the hearings have been completed.

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<sup>13</sup> SD26: Minor Changes Schedule