

Position Statement



Matter 2
Representor 2574
The Charborough Estate

PURBECK LDF
CORE STRATEGY DPD
EiP

MATTER 2 : GENERAL LOCATION OF DEVELOPMENT
(POLICY LD)

Position Statement
On behalf of:
The Charborough Estate

Pro Vision Planning and Design
AJP/CHA/1233

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ATTACHED

Front Covers:

Representation 2574 / CEN

Representation 2574 / LD

Table C1

Table C2

1 Overview

1.1

This Position Statement addresses only the Issues which follow.

1.2 Issue 2.2(a)

Is the apportionment of growth between the settlements property justified? The Charborough Estate considers that the hierarchy is broadly right but more emphasis should be given to Wareham and (in due course) Sandford.

1.2 Issue 2.2(b)

Why no settlement extension proposal at the key service Village of Sandford? The Charborough Estate considers Sandford to be a natural and sustainable location for more housing outside the existing development boundary, well related to employment at Holton Heath, and able to provided funds to mitigate traffic on the A351.

1.3 Issue 2.3

Are the proposed amendments to the Green Belt at Sandford justified? The Charborough Estate considers they are not, for the reasons outlined above, and because it is not in accord with the NPPF.

1.4 Issue 2.4

Does the Core Strategy address the possible need to safeguard "white land" between the Green Belt and the existing settlement edge at Sandford and North Wareham? The same applies.

1.5 Issue 2.5-6

"Other villages without a settlement boundary" The Charborough Estate supports a flexible and realistic approach to such villages but considers Policy LD needs to be changed to be effective in that respect.

1.6 Previous Representations

The Inspector is referred to the following Representations made by the Charborough Estate (2574) in response to

- Policy CEN ("Representation 2574 / CEN)
- Policy LD ("Representation 2574 / LD)

Copies of the front covers of these are attached to help the Inspector identify them.

2 Apportionment of Growth Between Settlements

2.1

This is addressed by Representation 2574 / CEN in respect of Section 7.3 Policy CEN Wareham and Sandford, in particular:

- Section 2 “Wareham as a sustainable focus for development” (Paras 2.1-2.12);
- Table A (forming the penultimate page of Appendix C) comparing the sustainability of Wareham and Swanage; and
- Paragraphs 3.10 – 3.12 re Sandford.

2.2

On the basis of that Representation the Charborough Estate considers Wareham to be a more sustainable location for urban-related development than elsewhere in the District. Since The Estate considers that the Core Strategy is unlikely to deliver the housing Purbeck needs, particularly the affordable housing and also employment land, Wareham should be a focus for more development than proposed by the Core Strategy.

2.3

Sandford (Wareham St Martin) is closely related to Wareham and also Holton Heath. In order to promote a sustainable pattern of development and to complement the relatively isolated employment at Holton Heath, the opportunity for further residential development at Sandford should be included in the Core Strategy, for either now or in the future.

2.4

Thus any strategic change in development provision (whether increase in provision, or diversion from other settlements, or both) should be focussed at Wareham and Sandford.

2.5

We attach two **illustrative** tables C1 and C2. These are taken from the distribution of dwellings set out in the Housing Land Supply Assessment 1 April 2011.

2.6

Table C1 illustrates how new dwellings would be distributed between settlements over the period 2012 – 2017 if in accord with the submitted Core Strategy. It will be noted that 40% of supply would be in Swanage despite the fact that Swanage has less than 25% of the District’s population. Only 27% would be focused around the sustainable hub of the District (Wareham and Sandford).

2.7

Table C2 illustrates how the distribution would change if sites at North Wareham (Tantinoby and Ferncroft) were allocated for 215 dwellings and (in due course) the “white land” at Sandford for 130 dwellings. On this basis something like 44% of new

3 Why No Extension for Sandford?

3.1

It is widely acknowledged that serious congestion on the A351 is bad for the Purbeck economy with serious impacts on Sandford and Corfe Castle. The Estate therefore accepts that it may not be appropriate to consider an extension to Sandford in the short term.

3.2

In the medium term, the Transport and Accessibility Background Paper refers to the possibility of establishing a Park and Ride at Holton Heath to serve Wareham, Corfe Castle and Swanage. This would require investment in a significant car park at Holton Heath. Housing at Sandford could help fund such a scheme. The White Land is capable of delivering more dwellings than assessed in the SHLAA. That could help take through traffic off the A351 through Sandford, and thus outweigh additional local traffic generated by the extra housing.

3.3

In the longer term, circumstances may change to allow a Sandford Bypass to be built; again, this would have to be funded by housing at Sandford, at least in part. There may be no immediate prospect of such a change in circumstances, but the local community should not abandon its long term aspirations.

3.4

For the reasons outlined above at paras 3.2 – 3.3 of this Position Statement, and paras 3.10 – 3.12 of Representation 2574 / CEN, Sandford is a sufficiently sustainable location for more housing, provided that the development helps to solve, not exacerbate, the traffic problem. The Charborough Estate therefore considers that the Core Strategy is not sound in that it does not provide for such development in due course.

4 Green Belt Boundaries and White Land

4.1

This subsection takes Issues 2.3 and 2.4 together.

4.2

The Inspector will be well aware that Section 9 of the NPPF sets out policies for "Protecting Green Belt Land". (Para 79 - 92).

4.3

NPPF 83 states that established Green Belt boundaries should only be altered in exceptional circumstances, through the review of the Local Plan, but that, through such review, the Local Planning Authority should consider whether such boundaries can endure beyond the plan period.

4.4

NPPF 85 states that the Local Planning Authority should, where need be, identify "safeguarded land" (white land) between the urban area and the green belt, to meet longer term development needs well beyond the plan period, so they do not have to be altered in the future.

4.5

So the question is: are there exceptional circumstances for:

- a) deleting the "white land" at Sandford?
- b) Altering the Green Belt to allow for allocations and / or "white land" at Wareham?

4.6

The Charborough Estate considers that in relation to Sandford, Section 3 of this Position Statement above, and paras 3.10 – 3.12 of Representation 2574 / CEN make a very sound case for a potential extension at Sandford, and to all intents and purposes the only place for that is the existing "white land". There are therefore no exceptional circumstances justifying its deletion. To do so would be contrary to NPPF 85.

4.7

The Core Strategy proposes to roll back the Green Belt at Wareham in order to accommodate a housing allocation at Worgret Road (inside the by-pass). Thus the principle of altering the Green Belt boundary at Wareham has been established: Wareham needs more housing, and housing should be directed to Wareham in order to help develop sustainable patterns of development; these amount to exceptional circumstances.

4.8

But the Core Strategy will not meet the housing and employment aims and objectives of the community within the plan period, let alone beyond it. There is no evidence that the one (housing) allocation will meet all Wareham's needs for Greenfield development beyond the plan period, even if it meets the housing needs within it, which at best is uncertain.

4.9

Therefore there is a need to consider further Greenfield allocations at Wareham. The most logical and sustainable location for that (North Wareham) will require the Green Belt to be altered. Even if such allocations are not needed for certain now, the Core Strategy must allow for future consideration in accord with NPPF 85.

4.10

Thus there are exceptional circumstances for altering the Green Belt boundary at North Wareham to allow for mixed development, either now or in the future.

5 Issues 2.5 and 2.6

5.1

The Charborough Estate's interest in these issues relate to "Other Villages without a Settlement Boundary" (in particular to Morden). This has been addressed at Representation 2574/LD and the Morden Village Case Study attached thereto.

5.2

It will be seen from para 1.7 of Representation 2574/LD that The Estate envisages settlement boundaries, or the potential for development in villages without settlement boundaries, to be reviewed via Neighbourhood Plans.

5.3

The wording put forward in that para 1.7 would give sufficient flexibility (together with commensurate changes to Policy CO and Policy NE).

5.4

The following NPPF paragraphs appear to support a more flexible approach to such villages:

- 17) Planning should be a creative exercise enhancing and improving places where people live;
- 28) Sustainable rural business growth should be supported;
- 28) The development of local facilities in villages should be promoted;
- 54) The Local Planning Authority should in particular consider whether some market housing would help provide affordable housing in rural areas;
- 55) Rural housing should be located where it will enhance or maintain the vitality of rural communities

183-5) Neighbourhood Plans.

5.5

The Core Strategy is not sound in respect of Policy NE in relation to Morden because (in regard to NPPF 182):

- a) It is not positively prepared in the light of NPPF 17 and 28;
- b) It is not the most appropriate strategy for Morden for the reasons outlined in Representation 2574/LD
- c) It would not be effective in helping to achieve the employment, facilities or housing Morden needs; and

- d) It would not accord with National Policy, particularly NPPF 54 and 55.

5.6

The changes to Policy LD set out in Representation 2574/LD will make the Core Strategy sound in that respect.

6 Changes to the Core Strategy

6.1

Policy LD as such does not need to be changed in regard to **Wareham**.

6.2

Policy LD is not sound in regard to **Sandford** and “**Other Villages without a Settlement Boundary**” for reasons set out above. Policy LD does therefore need to be changed in accord with Para 1.7 of Representation 2574/LD.

6.3

With regard to **Wareham** the Core Strategy is not sound for reasons set out above. The changes required to make the Core Strategy sound in respect of Wareham are:

- a) delete the potential development land at Tatinoby Farm and Ferncroft Farm from the Green Belt at this point in time; and
- b) subject to the Inspector’s conclusions as to Housing Land supply and the delivery of Affordable Housing, allocate these areas for mixed development (about 215 dwellings housing, about 1.3 ha employment, plus SANGS).

6.4

The Core Strategy does need to be changed by retaining the “**White Land**” at **Sandford**, because that proposal is not sound for reasons set out above. The white land must continue to be shown as such on the Proposals Map and all references to its deletion must be removed from the text and policies.

6.5

Subject to the Inspectors conclusions as to Housing Land Supply and Affordable Housing, consideration must be given to allocating a site within the white land at Sandford for about 130 dwellings.

**PURBECK DISTRICT COUNCIL
CORE STRATEGY**

PRE-SUBMISSION CONSULTATION

REPRESENTATIONS
on behalf of
THE CHARBOROUGH ESTATE

IN RESPECT OF

**SECTION 7.3
POLICY CEN
WAREHAM & SANDFORD**

AJP/20227/10.12.10

**PURBECK DISTRICT COUNCIL
CORE STRATEGY
PRE-SUBMISSION CONSULTATION**

REPRESENTATIONS
on behalf of
THE CHARBOROUGH ESTATE

POLICY LD
**“Other Villages without a
Settlement Boundary”**

AJP/20227/10.12.10

**HOUSING LAND DISTRIBUTION FROM 5 YEAR HOUSING LAND SUPPLY
ASSESSMENT 1 APRIL 2011**

| Town | Table 1 | Table 2 | Table 3 | Total | % |
|-------------------------------|--------------------------|--------------------------|------------------------|---------------------------|----------------|
| Swanage | 140 | 200 | 40 | 380 | 41.35 |
| Upton | 19 | 70 | 0 | 89 | 9.7 |
| Wareham | 42 | 200 | 8 | 250 | 27.2 |
| Sub Total Towns | (201) | (470) | (48) | (719) | (78.25) |
| Key Villages | | | | | |
| Bovington & Wool | 40 | 0 | 0 | 40 | 4.35 |
| Bere Regis | 4 | 50 | 0 | 54 | 5.87 |
| Corfe Castle | 5 | 0 | 0 | 5 | 0.5 |
| Lytchett Matravers | 9 | 50 | 0 | 59 | 6.42 |
| Sandford | 0 | 0 | 0 | 0 | 0 |
| Sub Total Key Villages | (58) | (100) | (0) | (158) | (17.14) |
| Other Villages | 42 | 0 | 0 | 42 | 4.5 |
| District Total | 301 33% | 570 62% | 48 5% | 919 100% | 100% |

**HOUSING LAND DISTRIBUTION FROM 5 YEAR HOUSING LAND SUPPLY
ASSESSMENT 1 APRIL 2011**

| Town | Table 1 | Table 2 | Table 3 | Total 2012-2017 | % |
|------------------------|------------|------------|----------|--------------------|--------|
| Swanage | 140 | 200 | 40 | 380 | 30 |
| Upton | 19 | 70 | 0 | 89 | 7.0 |
| Wareham | 42 | 415 | 8 | 465 | 36.8 |
| Sub Total Towns | (201) | (685) | (48) | (934) | (73.9) |
| Key Villages | | | | | |
| Bovington & Wool | 40 | 0 | 0 | 40 | 3.4 |
| Bere Regis | 4 | 50 | 0 | 54 | 4.6 |
| Corfe Castle | 5 | 0 | 0 | 5 | 0.42 |
| Lytchett Matravers | 9 | 50 | 0 | 59 | 5.0 |
| Sandford | 0 | 130 | 0 | 130 | 10.3 |
| Sub Total Key Villages | (58) | (230) | (0) | (288) | (22.8) |
| Other Villages | 42 | 0 | 0 | 42 | 4.5 |
| District Total | 301 33% | 915 62% | 48 5% | 1264 100% | 100% |