

Purbeck District Council: Core Strategy Examination in Public

Submission on behalf of ZBV (Winfrith) Ltd

Reference: 4953

MATTER 2: GENERAL LOCATON OF DEVELOPMENT (POLICY LD)

- 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 Policy LD of the Core Strategy acknowledges in paragraph 5.6.1 that there is clear support (63%) for the preferred option of growth in the Towns and Key Service Villages of the District. As a Key Service Village Wool would therefore be expected in principle to be included in the delivery of additional homes for the District.
- 2.1.2 The Pre-Submission Draft Core Strategy allocated only settlement extensions at Wareham (200 dwellings), Upton (70 dwellings) and Lytchett Matravers (50 dwellings), as well as for 200 dwellings at unidentified sites in Swanage and 50 dwellings at unidentified sites in Bere Regis.
- 2.1.3 It is our view that there is an absence of any detailed evidence from the Council to support the settlement hierarchy set out in Policy LD. It is assumed that the Council has formulated the settlement hierarchy from a simple interpretation of the current scale and function of existing settlements rather than a more appropriate (and positive) analysis of the options and opportunity for growth and expansion. This assumption is demonstrated by the inclusion of Wool in the same settlement category as much smaller and strategically less important settlements such as Bovington and Corfe Castle despite supporting a much greater level of services and one of the largest employment sites in the District at DGTP.

- 2.1.4 It is submitted that Wool and the surrounding settlements benefit from a number of positive characteristics which would make the settlement an appropriate location for sustainable growth. In short, these include the existence of a main line railway station, the existing provision of services and facilities and the availability of suitable brownfield sites to accommodate development (such as the designated employment site at Dorset Green Technology Park). This opportunity for growth was recognised in the Council's report (entitled: Implications of Additional Growth Scenarios for European Protected Sites - September 2010) which cautiously suggests that 1,000 new homes could be accommodated around Wool (with the introduction of suitable mitigation measures protecting nearby protected heathlands).
- 2.1.5 However, in their Development Options report (June 2009), the Council dismissed the potential for 400-1,000 dwellings at Wool, and particularly at the DGTP site, for reasons primarily relating to impact on landscape, habitats and species and the potential for unsustainable commuting to other population centres due to a lack of demand for inward investment in employment. However, ZBV feel that the sustainability appraisal did not carry out an appropriate level of assessment of the potential for growth at Wool, and the DGTP site in particular.
- 2.1.6 As detailed in response to issue 2.2, it is submitted that certain mitigation measures can be successfully incorporated, including the provision of sustainable transport measures and appropriate SANGs (Suitable Areas of Natural Green Space), which will ensure that any impact of development is minimised and that the benefits of growth greatly outweigh any potential negative implications. This is consistent with the presumption in favour of sustainable development set out in Paragraph 14 of the NPPF.
- 2.1.7 In contrast to this, a sustainability appraisal carried out by Watermans on behalf of ZBV has concluded that none of the allocated sites at other settlements are without some significant policy, environmental or other physical constraints (see appendix 2.1). The evidence for how such constraints might be overcome to ensure that the sites are available, suitable

and achievable is not comprehensively or systematically reported in either the Core Strategy or the SHLAA.

- 2.1.8 The proposed settlement hierarchy and the associated development strategy for accommodating growth set out in Policy LD is not considered to be sound as it is not based on a solid evidence base and currently does not have the level of flexibility necessary to ensure that the long term housing needs of the District are fulfilled. It is suggested that the settlement hierarchy set out in Policy LD should be restructured so that it provides greater clarity as to which settlements should be targeted for strategic growth. The Key Service Village of Wool should be listed as one of these settlements given that it has been demonstrated in our representations that substantial sustainable development can be brought forward at or around Wool. Such an amendment should be accompanied by a more detailed sustainability appraisal of potential development sites such as the Dorset Green Technology Park.
- 2.1.9 Furthermore, as currently drafted, Policy LD implies that those employment sites located outside Purbeck's existing settlements (which includes DGTP and Holton Heath) will be classified as 'countryside', where Policy CO imposes a general presumption against new development other than in exceptional circumstances. Whilst the policy text has been revised to indicate that an exception will be made for new development at existing employment sites, it continues to be our view that the Council's approach towards new development within these major employment locations is unclear, inconsistent with national policy guidance and (based on the wording of Policy LD) confusing in that no explanation is given as to what level or type of development would be permitted within these employment sites.
- 2.1.10 Paragraph 21 of the National Planning Policy Framework (NPPF) encourages local planning authorities to proactively support sustainable economic growth and identify strategic sites for local and inward investment to match anticipated requirements over the plan period. The DGTP and Holton Heath sites collectively provide approximately 120 hectares of employment land

(equivalent to 83% of the District's employment land supply). It is anticipated that both sites will accommodate the majority of new employment growth for the District.

2.1.11 Given the importance of both DGTP and Holton Heath in terms of meeting/accommodating forecasted economic growth, it is our view that both sites should be included within the settlement hierarchy of Policy LD and identified as a suitable location for new development. In our view, the current amendment to the policy text does not go far enough in supporting economic/housing growth.

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?

Is the apportionment of growth between the settlements properly justified?

2.2.1 As discussed in response to Issue 2.1, ZBV feel that the proposal in the Core Strategy to distribute housing growth between the settlements of Wareham, Lytchett Matravers, Upton and Swanage appears to emanate from the Council's perception of where growth should occur rather than a more appropriate and detailed analysis of the actual options and opportunities for sustainable growth and expansion throughout the entire settlement hierarchy.

2.2.2 This is exemplified by a lack of evidence base to support why certain settlements have been prioritised for growth over others. For example, the Core Strategy proposes the delivery of 200 homes at Swanage yet fails to identify any housing site allocation to delivery these homes in the Core Strategy. This clear lack of evidence base is further exacerbated by the fact that the HRA states that 15ha of SANGs is required to accommodate the delivery of 200 homes at Swanage yet the Core Strategy fails to demonstrate that appropriate mitigation can be provided in this instance.

2.2.3 Paragraph 52 of the NPPF states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns. However, there is a distinct lack of such larger housing sites identified in the Core Strategy to accommodate housing growth in the District. The site allocations which have been identified through settlement extensions at Wareham, Lytchett Matravers, Upton and Swanage are only capable of delivering a total of 570 dwellings (i.e. 30% of the Council's housing needs target of 2,400 homes). There is therefore likely to be heavy reliance on the delivery of a number of smaller-scale (infill) and windfall housing developments (which may/may not be delivered within the Core Strategy plan period).

2.2.4 This overdependence on smaller sites is likely to restrict opportunities for housing growth and is reflective of poor forward planning with a failure of the Council to identify and allocate sufficient new housing land supply that would effectively reduce the need for windfall development. It is not considered to be compliant with Paragraph 17 of the NPPF which seeks to proactively drive and support sustainable economic development to deliver the homes that the country needs, to maximise the use of public transport, walking and cycling and to focus significant development in locations which are or can be made sustainable.

Why are no settlement extensions proposed at Corfe Castle, Sandford and Wool which are all identified as key service villages?

2.2.5 ZBV has stated in previous representations to the Core Strategy that the Council have not appropriately assessed the suitability of settlements such as Wool to accommodate housing growth within the District. Wool and the surrounding settlements benefit from a number of positive characteristics which would make the settlement an appropriate location for sustainable growth including the existence of a main line railway station, existing services and facilities, the existence of suitable brownfield sites (such as the designated employment site at Dorset Green Technology Park) and the

available of renewable energy sources such as the consented low carbon biomass energy facility at DGTP.

- 2.2.6 This opportunity for growth was recognised in the Council's 2010 'Implications of Additional Growth' document which identifies that up to c.1,000 homes could potentially be provided in and around Wool subject to further assessment on mitigation. The Government Office for the South West also identifies in its letter to the District Council (December 2009) that the potential for housing at the DGTP employment site next to Wool needs to be explored as a sustainable development option.
- 2.2.7 As highlighted in response to issue 2.1 the Council investigated a housing growth scenario for Wool of 400-600 dwellings in the context of a mixed housing/employment development put forward by ZBV Winfrith Ltd. Although this appraisal was generally positive and highlighted a number of sustainability benefits of development it eventually concluded that the development would have significant negative effects on habitats and species due to a lack of suitable mitigation and would also increase commuting and pressure on the road network due to insufficient demand for employment floorspace on the site.
- 2.2.8 It continues to be our view that the Council's assessment has not properly considered the potential of prospective development sites in and around Wool (particularly at DGTP) to accommodate additional housing and economic growth. It is detailed in response to Matter 11 that appropriate heathland mitigation has not been provided for a number of sites allocated within the Core Strategy and that further investigation and assessment is required before they can be brought forward for development.
- 2.2.9 It is therefore unclear why the suitability of any sites in or around Wool (such as the DGTP site) were not examined in more detail as part of the preparation of the Core Strategy. As discussed in more detail in Issue 2.3 below and Matter 15, a Masterplan and outline planning application is being developed for the DGTP site which shows how c.700 homes can be effectively delivered

alongside appropriate SANGs proposals and as part of a comprehensive mixed use proposal.

2.2.10 As a brownfield site, which has also been subject to a detailed assessment by ZBV in terms of the feasibility to deliver substantial new mixed uses, DGTP and Wool in general represents a sequentially preferable option for sustainable growth. This is reinforced in Paragraph 17 of the NPPF which emphasises the preference for developments to come forward on brownfield sites over Greenfield sites wherever possible. It also promotes mixed use developments, and encourages multiple benefits from the use of land in urban and rural areas. Section 6, Paragraph 52 of the NPPF also states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages.

2.2.11 It is our view that the Council's failure to comprehensively assess the development potential of settlements such as Wool (including existing brownfield sites such as DGTP) is not compliant with the policy objectives of the NPPF as it is unnecessarily neglecting the opportunity to meet higher levels of housing growth, improve affordability and stimulate employment growth. The mixed use allocation at Dorset Green is considered to be a sustainable and appropriate option to deliver housing for the District, which will support the strategic employment allocation and be adequately mitigated through the SANGS proposals.

2.3 Has sufficient consideration been given to opportunities for development within urban areas and on other sites beyond the green belt?

2.3.1 As the allocated sites proposed for housing delivery in the Core Strategy are predominately small and medium sites, the ability for these sites to deliver the required affordable housing levels as well as services and facilities and public transport improvements to support additional housing is questioned. The housing supply also appears to be dependent upon (yet to be identified) settlement extensions to Bere Regis (50 units) and Swanage (200 units), alongside a substantial number of smaller sites referred to as 'character area

potential' (approximately 1,070 units). This raises serious questions over the ability of the Council to achieve its affordable housing targets.

- 2.3.2 It is our view that one of the key reasons why the Core Strategy does not respond to the acknowledged shortfall in housing supply within the plan period is the decision to discount the larger strategic brownfield sites from the Core Strategy (particularly the DGTP site).
- 2.3.3 As set out in an earlier response to Matter 2 (2.1 above), we are concerned about the omission of Purbeck's major employment sites at Dorset Green Technology Park and Holton Heath from the settlement hierarchy set out in Policy LD: General Location of Development. Whilst the policy text has been revised to indicate that an exception will be made for new development at existing employment sites outside of the existing settlements, it continues to be our view that the Council's approach towards new development within these major employment locations is unclear, inconsistent with national policy guidance and (based on the wording of Policy LD) confusing.
- 2.3.4 A number of other amendments to the Core Strategy also propose to further weaken the policy support for growth at Dorset Green Technology Park. These include the removal of references to further concentration of employment development on 20 hectares at DGTP in Policy ELS and Policy SW and the inclusion of an unsubstantiated statement in paragraph 6.1.4 that *"the delivery of new employment growth at Dorset Green is not essential to the delivery of the Purbeck vision"*.
- 2.3.5 This latest approach by the Council to completely erase DGTP from consideration for future development in the Core Strategy is entirely inconsistent with the fact that the DGTP and Holton Heath sites collectively provide approximately 120 hectares of employment land (equivalent to 83% of the District's employment land supply) and would be anticipated to accommodate a large proportion of new employment growth for the District.

2.3.6 The DGTP site provides approximately 72 hectares of employment land (equivalent to 50% of the Purbeck's employment land supply) and has been identified as an appropriate location for growth by the SWRDA Workspace Strategy (2008) and by the GOSW in their letter to Purbeck Council (dated 23/11/2009) responding to the 'Preferred Options Consultation' on the Purbeck Core Strategy. It is considered that providing new housing close to major employment sites is not only a key sustainability issue in relation to spatial planning, but it is also vital in terms of meeting projected housing needs within Purbeck. It is therefore clear that the DGTP site should be reconsidered in this regard.

2.3.7 As discussed in response to Matter 15 and other matters, the DGTP site is currently subject to the preparation of a detailed masterplan and outline planning application which will bring about a number of strategic planning benefits for the District (as shown below) which would be difficult to achieve with the allocated sites currently proposed in the Core Strategy. These include:

- The creation of a 'prestige' business park alongside the provision of supporting uses/facilities (such as the conferencing facilities, visitor accommodation, recreation and retail uses) which can contribute to the Core Strategy Vision for future employment opportunities throughout the planning period;
- The provision of up to 700 dwellings, including affordable housing and low cost housing for local people, would contribute to meeting the housing targets and the recognised shortfall of housing within the district;
- The provision of a range of recreational open space and green infrastructure including a c. 29 hectare SANGS proposal designed to offset any impacts on the nearby designated heathlands;

- The use of a Green Travel Plan, agreed in principle with Dorset County Council, which outlines how the developer intends to improve the existing public transport and infrastructure of the surrounding area;
- The provision of housing next to employment offering the opportunity for residents to live, work, learn and socialise in the same geographical area. This is consistent with Paragraph 30 of the NPPF which encourages patterns of development which support reductions in greenhouse gas emissions and reduce congestion;
- Opportunities to harness the economic potential of tourism through a hotel, visitor centre and ecology centre and also provides the option of a new school as well as higher education and training facilities; and
- Provision of 'zero carbon' homes through sustainable design and a connection to the consented Dorset Green Low Carbon Energy Facility (LowCEF).

2.3.8 Considering the smaller scale of the potential housing allocations and SHLAA Sites, it is anticipated that it would not be possible for them to make such a contribution to economic and social development in the District as the Dorset Green masterplan. It would also not be economically viable for them to provide the same level of heathland mitigation, public transport improvements or the same scale, range and quality of recreational open space.

2.3.9 As a result, the Council is demonstrably failing to acknowledge a significant opportunity on one of the largest brownfield sites to more effectively cater for projected growth within the District thereby increasing the requirement for the use of undeveloped sites within the Green Belt. This is contrary to the NPPF which encourages local authorities to reuse previously developed (brownfield land), proactively support sustainable economic growth and identify strategic sites for local and inward investment to match anticipated requirements over the plan period. The NPPF also points out that *"the supply of homes can*

sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages” (NPPF, paragraph 52).

2.3.10 Given the importance of the DGTP site in meeting/accommodating forecasted economic growth and housing supply, it is our view that it should be clearly identified within both Policy LD and Table 2 as a settlement in its own right (and therefore a suitable location for new development).