



**Purbeck Core Strategy
Examination in Public**

Issues for Discussion

Overall Approach of the DPD

**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 1: BASIS FOR THE OVERALL APPROACH OF THE DPD (CHAPTERS 1-4).

2.1 *Issue 1.1* questions whether the DPD has regard to national and sub-regional policy. Clearly in respect of national policy it does not. This is not a criticism, just chronology and fact. The National Planning Policy Framework (NPPF) was only published in March 2012 and post dates the CS. However, Paragraph 2 makes it clear that the NPPF must be taken into account when preparing local plans. More detailed references to the NPPF will be made later in these representations.

2.2 The CS does not refer specifically to the Regional Spatial Strategy (RSS), presumably because of its abolition. However, the evidence base still exists; key elements of which are set out in the Examination in Public Panel Report and the Proposed Changes to the RSS. These include the fact that a new settlement of 2,750 dwellings was proposed for the Purbeck, taking the overall housing target up to 5,150. This is considerably more than the current CS level of 2,400; plus 120 for the extra year of the plan period.

- 2.3 The CS refers, in Paragraph 6.1.2, to government household projections (2009) indicating a demand for 4,000 dwellings in the district. In its own right this merits a re-evaluation of the overall strategic target. The CS proposes an urban extension at Upton. However, this will mostly satisfy housing need arising primarily from the Borough of Poole. Also, if the previously proposed new settlement was felt to adversely compromise nature conservation interests, alternative strategies for growth should be considered; not just dropped entirely.
- 2.4 *Issue 1.2* asks whether the overall spatial strategy is based on a sound assessment of the socio-economic and environmental characteristics of the area. Whilst we do not question whether the environmental characteristics have been assessed, it is not clear that the socio-economic issues have been dealt with in a thorough manner. We state this in the context of our earlier comment regarding the low strategic housing target when compared to current demographic projections; as well as the 1,660 households on the council's housing register and the 3,060 'requests' identified in other matters and issues.
- 2.5 The CS Settlement Strategy Background Paper (Volume 10) identifies a hierarchy based on three categories:
1. Wareham and Swanage.
 2. Key Service Villages (where some additional development could be considered).
 3. Local Service Villages (where small scale development could support important facilities).
- 2.6 Stoborough falls within the third category. It has important local facilities that could be supported by additional residential development. However, the CS only considers amending settlement boundaries in the first two categories. There is little, if any, consideration as to whether facilities in Local Service Villages could be supported by more medium scale development allocations; or why the consideration of development in these locations is deferred until later DPD's. In the intervening period, the local facilities could fail.

2.7 *Issue 1.3:* taking into account the matters set out earlier, we concur that there is too much reliance on the preparation of subsequent plans. In this respect the current Local Development Scheme (LDS) prioritises the production of DPD's as follows:

1. Core Strategy.
2. Swanage Area Action Plan.
3. Joint Dorset Heathlands DPD.
4. Joint Gypsy & Traveller DPD.
5. Site Allocations DPD.

2.8 The Site Allocations DPD will deal with the potential amendment to settlement boundaries in the Local Service Villages. However, it is currently last in the LDS timetable. It is stated that work on it will commence in 2012, but that future work is: "... .. *to be confirmed in a future LDS update.*"

2.9 The reference to the Site Allocations DPD is therefore relatively meaningless. It is our submission that the evaluation of potential development sites in each category of the settlement hierarchy must be undertaken at the same time. If as a result of the EIP the overall strategic housing target is considered too low, or that some urban extension sites are not deliverable, the CS will automatically omit the consideration of potentially suitable sites in Local Service Villages. This is a matter that is of relevance to the consideration of *Issue 5*; i.e. a potential fallback position will not be available.

2.10 *Issue 1.4;* this submission only deals with the quantum of development proposed for housing. In accordance with our earlier representations, we consider that the CS should seek to deliver more housing in Purbeck District; taking into account demographic factors, evidence of housing need; and the NPPF.

2.11 In respect of the new national policy, Paragraph 47 of the NPPF requires local plans to meet the full, objectively assessed needs, for market and

affordable housing. For example, in addition to the estimate of housing need as set out earlier, the Bournemouth and Poole Housing Market Area 2011 Strategic Housing Market Update (SHMA), January 2012, identifies 4,611 residents in unsuitable housing; 7.1%. This represents an increase from 6.0% from the 2007 Household Survey Data.

- 2.12 The SHMA, in Figure 6.12, identifies the following estimate of future housing need for the district.

Year	New Households	Existing Households	Total
2007	116	329	445
2011	137	398	536

- 2.13 This shows that future housing need in both categories has increased in the last four years. In 2011 alone the overall need now exceeds the CS annual rate of development of 120 dwellings. We consider that there is sufficient justification for the CS housing target to be increased.

- 2.14 This approach is supported by other statements set out in the NPPF, including the second bullet point of Paragraph 47. This requires five years worth of housing to be delivered against the overall requirements, plus an additional 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. This could not have been anticipated when the CS was prepared, but it is now a requirement; and should be judged as such.

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

