

## **Examination of the Purbeck Core Strategy Development Plan Document**

### **Statement of JS Bloor (Newbury) Ltd**

#### **Matter 1 – Basis for the Overall Approach of the DPD**

##### **Foreword by JS Bloor (Newbury) Ltd**

JS Bloor (Newbury) Ltd considers that a deliverable, strategic, housing-led development proposal exists at Lytchett Minster.

Land at and around this village offers the potential to address the District housing allocation shortfall, and to deliver in tandem a high quality strategic Suitable Alternative/Accessible Natural Greenspace (SANG) that has the potential to avoid and mitigate recreational impacts on the Dorset Heathlands as part of a wider package of mitigation measures.

The local planning authority has not taken a positive approach to exploring the delivery potential and scenarios for this area. It has looked for difficulties and problems, rather than working collaboratively to provide solutions for delivery that work within the framework of the Habitats Regulations. In failing to take a positive approach it has overlooked the obvious strategic location in the District for increasing the supply of homes that Purbeck District – and the wider South East Dorset conurbation – requires now and in the longer term.

1.1 Does the DPD have regard to national and sub-regional policy and if there are any divergences how are these justified? What are the implications of the forthcoming revocation of Regional Spatial Strategies? Are there satisfactory linkages with the Purbeck Community Plan and other local strategies? Has the duty to co-operate been fulfilled?

The Core Strategy does not provide for the full housing need of Purbeck District. It therefore conflicts with paragraph 17 of the NPPF (third bullet) to make “every effort” to meet the development needs of the District.

The NPPF test of soundness to positively prepare the Core Strategy to meet objectively assessed development requirements has not been met. A test of soundness is also failed because the selected strategy of underprovision has not been justified against an exhaustive assessment of alternative higher growth strategy options.

Whilst it is recognised that the latest housing projections signal reduced growth requirements compared to those being considered through the South West Regional Spatial Strategy (RSS) preparation process, the growth levels now being planned for in Purbeck are particularly modest and do not meet requirements identified in the 2011 Strategic Housing Market Assessment (SHMA).

The emerging Core Strategy is wholly parochial, ignoring the cross boundary spatial links between Purbeck and the South East Dorset conurbation that were firmly identified through the RSS process and appropriately recognised at that time through the provision of a proposed strategic direction of growth at Lytchett Minster.

1.2 In general terms is the overall spatial strategy based on a sound assessment of the socio-economic and environmental characteristics of the area, and are the impacts of the proposals properly addressed?

The Core Strategy is deficient in its lack of attention to strategic cross-boundary impacts and issues, particularly the very significant relationship of Purbeck to the South East Dorset conurbation. This relationship manifests itself most notably in planning terms by reference to travel to work and recreation patterns, and the associated overlap of Purbeck with the Bournemouth-Poole Housing Market Area.

Put simply the Core Strategy has completely failed to highlight the existing links between Purbeck and Poole/Bournemouth, even though the conurbation is a dominant influence on the economic, social and cultural lives of many people in Purbeck, particularly those in North East Purbeck.

Notably, the Borough of Poole is a major net importer of labour from Purbeck. By way of example, the South East Dorset Strategy Paper on Commuting, 2005 (which was prepared using 2001 census data by Dorset County Council, Bournemouth Borough Council and the Borough of Poole) identified that of the total working residents of Upton and Lytchett Minster ward, 21% lived and worked in their home area, 66% travelled to Poole to work

and 11% to Bournemouth. The study also identified a flow of over 1,000 daily commuters from Wareham and nearly 500 commuters from Swanage to South East Dorset. Just 2.3% of all in commuters to South East Dorset travelled by train, and 2.9% by bus or taxi.

In the light of the inter-relationships between Purbeck and the conurbation, JS Bloor (Newbury) Ltd considers that a sustainable spatial strategy needs to be developed for the North East Purbeck area that increases growth at the most accessible point in this location by a range of transport modes whilst delivering strategically important SANG / green infrastructure. This can be achieved through accommodating a housing-led strategic development proposal at / adjoining Lytchett Minster, which sits on the principal bus corridor between Purbeck and Poole, immediately adjacent to the A35.

As a result of the RSS process, further growth at Lytchett Minster has developed somewhat of a 'pariah status', resulting in Purbeck District failing to properly consider the opportunities for sustainable development at Lytchett Minster in an objective way.

Similarly, the RSS process has resulted locally in Purbeck District Council underplaying through its Core Strategy the substantial influence and importance of the conurbation in everyday life in Purbeck, to the detriment of joined up planning and decision-making.

**1.3 Is the DPD based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the site selection process been objective and based on appropriate criteria? Is there too much reliance on the preparation of 'subsequent plans' and should such references be more specific? Are such plans identified in the Local Development Scheme?**

The Core Strategy does not meet all of the housing requirements evidenced by Strategic Housing Market Assessment (SHMA) data / Office of National Statistics population projections. It pursues a deliberate strategy of underprovision without technical justification for doing so.

The DPD is not informed by robust and comprehensive testing of the full range of alternatives for accommodating higher levels of growth (either through sustainability appraisal or habitats regulations assessments), and is not therefore positively prepared.

Notably, JS Bloor (Newbury) Ltd finds the 'Implications of additional growth scenarios for European Protected Sites' evidence base study flawed and has attached to this statement a critique of the document to fully amplify its concerns.

The Habitats Regulations Assessment of the Core Strategy proposes that the Joint Heathlands DPD will identify further projects to mitigate the development proposed through the Core Strategy. It is considered that the Heathlands DPD should be brought forward as a priority alongside a partial review of the Core Strategy. This should seek to deliver the full development requirements of Purbeck together with a more strategic approach to the long-term provision of green infrastructure within the District as a whole and particularly on the edge of the conurbation.

#### 1.4 In broad terms is the quantum of development proposed for housing, employment and retail properly justified? Is it deliverable over the timescales proposed?

It is understood that the total of 2,400 dwellings for Purbeck is derived from the requirement for the District contained within the Secretary of State's Proposed Changes to the South West RSS, minus the 2,750 dwellings strategic allocation proposed for Lytchett Minster by the emerging regional document. This is a selective use of figures that has not been appropriately justified.

The continued use of the 2,400 dwellings 'target' also fails to be justified by reference either to updated SHMA evidence, or to the rigorous testing of comprehensive and logical alternative scenarios for growth. For example JS Bloor (Newbury) Ltd considers that the 'Implications of additional growth scenarios for European Protected Sites' evidence base is flawed.

The Core Strategy figure of 120 units per annum is significantly less than 170 dwellings per annum identified in the 2011 SHMA, ie 2,400 dwellings in the twenty-year plan period 2006-2026 rather than 3,400 dwellings. This would indicate that the underprovision for Purbeck's own projected requirements is some 1,000 dwellings – notwithstanding any wider unmet strategic need associated with the South East Dorset conurbation.

The deliberate strategy of underprovision of housing compared to any objectively assessed development requirement cannot be justified and substantiated by robust and comprehensive technical evidence. It will do little to address the very substantial levels of local affordable housing need that exist in Purbeck.

#### 1.5 What are the main risks to delivery; does the Council have an appropriate fall-back position; and is there sufficient flexibility to accommodate any unforeseen circumstances? What are the triggers for a review of the document?

It is considered that an *immediate* partial review is required to fully accommodate the development requirements of the District, notwithstanding the high risk strategy in Purbeck to heavily rely on windfalls.

The review must consider a long-term framework for managing change in Purbeck given continuing growth needs, the need for a clearer transport strategy, and the ecology / recreation issues faced. This work should be prepared in tandem with the preparation joint Heathlands DPD to demonstrate a cross-boundary approach to heathland mitigation. It should consider a longer-term green belt boundary revision in the light of the sustainable directions for development that are selected.

**‘Implications of additional growth scenarios for European protected sites’,  
September 2010**

**A review of the Purbeck Core Strategy evidence base study**

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**Introduction**

This paper accompanies JS Bloor (Newbury) Ltd’s statements to the Purbeck Core Strategy Examination. It reviews the robustness of an evidence base study prepared for Purbeck District Council in September 2010.

It is emphasised that JS Bloor (Newbury) Ltd requested the opportunity to participate in agreeing the study brief in 2010 (particularly the methodology and the scenarios to be tested), but this request was not accommodated by the planning authority or the consultant preparing the work.

The main concerns raised in this paper are as follows.

- The selection of growth scenarios for testing through evidence is illogical, incomplete and inadequately justified
- The methodology and structure of the assessment lacks clarity and is not robust, and
- The findings of the assessment are inconclusive, and appear to involve bias in the comparative assessment of additional growth locations.

Each of these matters is briefly discussed in this paper.

**Selection of growth scenarios for testing**

The scenarios for testing through the evidence base study are not clearly explained or justified.

It is our understanding that the assessment scenarios proposed by Purbeck District Council for consultant assessment are as follows. We have attributed our own lettering system to each scenario.

	<b>Total number of dwellings involved in scenario</b>	<b>Total number of additional dwellings tested above ‘Core Strategy Baseline’</b>	<b>Comments</b>
<b>Core Strategy Baseline position</b>	2,400	N/A	2,400 dwellings baseline has been subject to Core Strategy Habitats Regulations Assessment
<b>A. “Lower level growth”</b>	2,650	250	Includes additional number of homes within urban area (lower estimate).
<b>B. “Higher level growth”</b>	3,360	960	Includes additional number of homes within urban area (higher estimate).
<b>C. “Higher level of growth plus a further 1,000 dwellings at Wool”</b>	4,360	1,960	
<b>D. “Higher level of growth plus a further 500 dwellings at Wareham”</b>	3,860	1,460	
<b>E. “Higher level of growth plus a further 500 dwellings at Lytchett Minster”</b>	3,860	1,460	

JS Bloor (Newbury) Ltd notes the following on these scenarios:

- The scenarios do not appear to dovetail with any wider sustainability appraisal of options for the purposes of Core Strategy preparation
- There is no obvious reason why the Core Strategy baseline figure is 2,400 homes. It appears to have no relationship, for example, to Strategic Housing Market Assessment evidence.
- It is not clear how the additional ‘urban capacity’ dwellings in scenarios A and B are distributed in the District.

- It is not clear why scenarios C, D and E take scenario B ‘higher level (urban) growth’ as a baseline, and not the Core Strategy baseline. For example a variation of scenario E would be 2,400 dwellings District-wide plus 500 dwellings at Lytchett Minster (total 2,900 homes rather than 3,860 homes).
- There is no rationale for why a scenario figure of 500 additional dwellings has been identified for Wareham and Lytchett Minster. A range of potential development scenarios may exist for these locations. In the case of Lytchett Minster scenarios of 7,000 and 2,750 homes have been previously considered through the now abandoned RSS preparation process.

### **Assessment methodology and structure**

Following the setting out of scenarios, paragraph 1.14 of the report explains that the study “simply highlights the relevant considerations and issues relating to higher growth scenarios”.

We therefore emphasise that the evidence base report is more of a ‘general discussion’ than a conclusive evaluation.

The report examines the additional growth scenarios in the context of the following topic chapters:

- Housing and recreational pressures on European protected heaths and sand dunes in Purbeck District
- Recreational pressures on the Poole Harbour SPA/Ramsar from increased shore-based and water based activities as a result of new housing
- Recreational pressures to coastal SAC sites as a result of enhanced transport links and housing
- Recreational pressure to the New Forest SPA/SAC/Ramsar as a result of increased population and enhanced transport links within Purbeck
- Water issues generally (including abstraction and water quality) in relation to European protected sites
- Fragmentation and pressure on heathland sites as a result of the Holten Heath employment allocation, and
- Air quality impact issues generally on European protected sites as a result of increased traffic.

At paragraph 1.16 of the report it is explained that additional mitigation measures are identified (where possible) for scenarios as a result of the increased levels of housing.

We make the following observations on the overall approach:

- There is a lack of reference to other plans and projects that cover European sites. For example the Dorset Heathlands SPA and Dorset Heaths SAC covers a number of different districts and boroughs, but there is no attention given in the report to cross-boundary relationships and the in-combination impacts and issues associated with proposed levels of growth in other plans or projects.
- There is little or no discussion made about the quality and availability of data against which to assess each scenario.

- As the approach simply involves a discussion on issues, it is difficult to draw clear conclusions from the work. There is also the potential for general sweeping statements to be made that are not fully backed up by evidence.

### **The findings**

In view of the limitations of the methodology employed, the assessment of impacts appears rather inconsistent and generalised.

Rather than systematic evaluation of the scenarios, the report reads as a discussion of some of the key issues, with some rather generalised findings.

Notably the report does not specifically focus on the implications of each growth scenario on the interest features of the European sites.

As detailed examples of inconsistencies and generalisations we note:

- The assessment of sites accessible to residents of Wool (para 2.5) includes assessment of drive time and road distance as well as the cruder ‘as the crow flies’ measurements. This finer grain assessment is not included for either the Wareham or Lytchett Minster. The lack of consistent assessment counts against Lytchett Minster as it is not immediately apparent that sites close to Lytchett Minster such as Rockley Park falls in the 3,000 m zone on Map 5 are nearly twice as far by road (the distance on the road is 6.6 km), similarly Arne is shown as falling 4-5,000m zone whereas the distance by road is a minimum of 10 km to these sites.
- One of the major advantages of Lytchett Minster – that the most ready access to Upton Heath is via Beacon Hill with Dorset Wildlife Trust / Urban Heathland Project staff and a car-park. This a significant bonus when trying to educate people about responsible use of the heath.
- The comments about the number of car parking spaces within 5,000m for Lytchett Minster being greater than the other sites is potentially misleading without clearer explanation that many of these are on one, intensively used site – Ham Common.
- In para 2.34 and 2.35 the Wool and Wareham scenarios are discussed but Lytchett Minster appears to have fallen by the wayside without any assessment of why it is deemed less suitable than the other sites. In the following discussion of potential impacts there is no identification of any impacts on the sites discussed from Lytchett Minster and the higher growth scenario.
- The SANG options given in para 2.60 do not include by name either Lytchett Minster or Wool. However rather than treating sites equally only Wool is identified for consideration in para 2.61.
- The assessment of Wool in para 2.70-2.73 would indicate that a SANG close to a development with woodland, developed from arable land and not crossed by roads would be sufficient to draw people away from heathland sites. There is no discussion or evaluation of whether this would be possible at Lytchett Minster. There are no obvious discernable differences between the farmland surrounding Wool discussed and the land surrounding Lytchett Minster.
- In para 3.6 the comments that development at Lytchett Minster might increase numbers using the north shore of Poole Harbour seems to be based on no evidence. The authors acknowledge in para 3.5 that data does not exist. If access is easiest along the north shore for water based recreation it is likely people will travel to these areas irrespective of where the development is.



It is possible therefore that a 1,000 homes scenario at Wool would have a similar impact to 500 homes at Wareham or Lytchett Minster.

The above provides evidence of potential bias in the report findings.

## **Conclusion**

JS Bloor (Newbury) Ltd finds that the evidence base report is more of a ‘general discussion’ than a conclusive evaluation.

The report has not rigorously used common criteria for assessment, and has avoided a fully systematic approach to reporting the findings on each of the scenarios that would give an ‘even playing field’. The drawbacks of the discursive approach adopted in the report is that it provides opportunities to emphasise findings when it suits, and be silent on other findings when it doesn’t.

The main summary of the work (page 2 of the report) suggests that:

“The five scenarios all have additional impacts to European sites above those already identified for the Core Strategy. Such levels of development *may not be currently* possible within the District without contravening the Habitat Regulations.” [Our italics emphasis]

It is our contention that the conclusion could equally have been:

“The five initial scenarios all have potential impacts to European sites above those already identified for the Core Strategy. Achieving such levels of development will be challenging and will require additional justification, including further local and strategic mitigation measures, if the Habitat Regulations are not to be contravened.”

The evidence does not identify that there is a ‘limit’ to the levels of growth that may be accommodated within the District. Nor does it suggest the need for a programme over which development may be phased.

We consider that the additional opportunities in Purbeck for achieving local and strategic mitigation have not been appropriately evaluated, and this must be done urgently as part of a strategic planning exercise for higher levels of growth in tandem with the preparation of the Dorset Heathland Joint Development Plan Document.

Given the mix, quality and accessibility of fields and woodland at Lytchett Minster, including an existing patterns of footpath and bridleways, it is considered that there is readily suitable land for the creation of a SANG. In addition, given the proximity of Lytchett Minster to the South East Dorset conurbation, a well located SANG at Lytchett Minster could help to divert some of the recreational impacts associated with existing and future residents of the conurbation by intercepting leisure trips that would otherwise head for heath and coast.

JS Bloor (Newbury) Ltd remains willing to work constructively with Purbeck District Council to help address matters raised here. However, the overall conclusion of this review is that the evidence base report is flawed to the extent it cannot be relied upon for decision making purposes.