



## **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 - 10am**

#### **Matter 1 – Basis for the Overall Approach of the DPD (Chapters 1 to 4)**

##### Issues

- 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?
- 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?
- 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?
- 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?
- 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?

## Introduction

1. This statement considers all the issues within Matter 1 (Basis for the Overall Approach of the DPD)

## 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:

**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?**

### National and Sub Regional Policy

1. The Council considers that the Core Strategy is generally consistent with national policy and Regional Planning Guidance 10. The Core Strategy does not need to conform to the previously [emerging] Regional Spatial Strategy for the South West (RSS) as it is highly unlikely that the Secretary of State will complete the plan, following his decision to revoke regional guidance.
2. The Council acknowledges that there are some changes to the Core Strategy that would make it fully compliant with the recently published national policy. Therefore, officers will submit a modifications schedule prior to the hearings. This will replace the Minor Changes Schedule (MCS)<sup>1</sup> that was prepared in the context of the draft National Planning Policy Framework (NPPF). Provided there is Council agreement, these modifications will be consulted on for six weeks following the hearings in June/July. Representations to the Council regarding the modifications will be passed to the Inspector to conclude his recommendations on the soundness of the Core Strategy. The Inspector has agreed to this approach.
3. Paragraph 14 of the NPPF requires councils to objectively assess needs and positively plan sustainable development, unless any adverse impacts of doing so outweigh the benefits. The Council has objectively assessed and can meet employment and retail needs. However, it acknowledges that it cannot meet all housing needs. Housing needs are far higher than what is planned for by the Core Strategy, but there is too much uncertainty over the effectiveness of mitigating adverse impacts upon European protected sites. The potential adverse effects to internationally important wildlife and species outweigh the housing needs. Purbeck, and South East Dorset as a whole, simply cannot build its way out of a housing shortage.
4. Within these limitations, the Core Strategy plans positively for sustainable development by seeking to improve the self-sufficiency of settlements, by supporting town centres, by linking new housing to employment opportunities and by planning

<sup>1</sup> SD26: Minor Change Schedule

for improved infrastructure, including public transport, which should reduce the need to travel by car.

5. A sound Core Strategy is imperative, to provide certainty for local communities, service providers, landowners and developers. It would be reckless for the Council to risk unsoundness, by planning for a higher level of growth in light of advice received from Natural England and bearing in mind the absence of an up to date Local Plan (or any saved policies). Once the Core Strategy is adopted and certainty assured, the Council can explore any potential opportunities for longer-term sustainable growth.

### **Revocation of the RSS**

6. Government's proposed revocation of the previously [emerging] RSS, will not have much bearing on the Core Strategy. There are no policies within the Core Strategy that rely upon a steer from the RSS. The submitted Core Strategy already benefits from a community focus befitting of the Government's localism agenda. For example, the Core Strategy housing target of 2,520 dwellings is locally determined, higher than the draft RSS and lower than the Secretary of State's Proposed Changes to the RSS. Furthermore, the Core Strategy has moved away from the urban focus of the RSS, by providing greater support for rural settlements following objections from smaller communities that want and need development to maintain the viability of their community.

### **Community plan and other strategies**

7. The Purbeck Community Plan<sup>2</sup> has seven priority areas, the spatial elements of which have been interpreted into the vision for Purbeck and the Core Strategy spatial objectives. Furthermore, the spatial priorities of local communities as set out in parish and town plans have been referenced in chapter 7 of the Core Strategy. Further detail on how Core Strategy policies will deliver parish and town plan actions is included in the evidence base<sup>3</sup>.
8. The Core Strategy has, wherever possible, made reference to local strategies. The Council has responded to the representations made by statutory organisations to ensure that, where possible, the Core Strategy will help deliver their spatial aspirations. For example, all concerns raised by Dorset County Council, Natural England, the Highways Agency, the Environment Agency and English Heritage, amongst others, have been fully resolved.

### **Duty to co-operate**

9. Paragraph 178 of the NPPF has introduced the duty to co-operate in March 2012. This was after preparation of the Core Strategy had been completed in November 2011. However, the Core Strategy meets this new test, as there is excellent joint working and co-operation amongst local authorities and statutory bodies, as referred to in paragraph 8 above. All statutory organisations are working towards a common purpose in Purbeck. This is evident from the lack of objections from neighbouring councils and that the Council has resolved any concerns raised by other statutory

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<sup>2</sup> CD68: Purbeck Community Plan (2009)

<sup>3</sup> CD67: Parish Plans and Purbeck's Core Strategy (2011)

consultees. Further detail on the duty to co-operate is set out in the evidence base<sup>4</sup> and in response to a separate question from the Inspector<sup>5</sup>.

**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?**

10. The Core Strategy is supported by an extensive and comprehensive evidence base<sup>6</sup> collated over the six years of preparation of the Core Strategy. It objectively addresses all relevant social, economic and environmental issues and is a sound basis for the Core Strategy.
11. The 2006 Issues and Options<sup>7</sup> consultation set out the socio-economic and environmental issues that the Core Strategy would need to deal with. The issues and challenges are set out in Chapter 3 of the submitted Core Strategy. Chapter 7 splits the issues into each of the five spatial areas in Purbeck and highlights issues raised by local communities in their parish and town plans. The baseline information and further issues have been highlighted in chapter 2 of the Sustainability Appraisal<sup>8</sup>.
12. The impacts of the Core Strategy proposals have been thoroughly assessed through an iterative sustainability appraisal process as discussed under 1.3 below. The Council has also undertaken a Health Impact Assessment and an Equalities Impact Assessment. In addition, the environmental impacts have been through a similarly thorough and iterative process of habitats regulations assessment. Crucially, all of the negative impacts have been addressed and mitigation measures put in place, with one exception, the overall level of housing, which is discussed under 1.5 below.

**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?**

**Sustainability Appraisal**

13. The Council considers that the Core Strategy is based on a sound process of sustainability appraisal<sup>9</sup> (SA) and testing of reasonable alternatives, and that the submitted Core Strategy represents the most appropriate strategy.
14. SA formed an important part of the plan making process and a concurrent version of the SA was published at key stages of the Core Strategy preparation. The housing,

<sup>4</sup> SD25: Purbeck Core Strategy Duty to Co-operate Statement

<sup>5</sup> <http://www.dorsetforyou.com/media.jsp?mediaid=171455&filetype=pdf>

<sup>6</sup> Core Documents list CD1 – CD162

<sup>7</sup> CD4 – CD6: Issues and Options 2006

<sup>8</sup> SD15: Sustainability Appraisal for Proposed Changes to Core Strategy Pre-Submission 2011

<sup>9</sup> SD5: Sustainability Appraisal 2010; SD15: Sustainability Appraisal for Proposed Changes to Core Strategy Pre-Submission 2011; CD1: Sustainability Appraisal Scoping Report; CD5: Sustainability Appraisal for Issues and Options Leaflet 2006; CD10: Sustainability Appraisal for Preferred Options 2006 Full Document; CD18: Sustainability Appraisal for Preferred Options 2009; CD140p: SED 16 Strategic Sustainability Appraisal Report

employment and retail targets have all been assessed against reasonable alternatives. The Development Options background paper<sup>10</sup> assessed the benefits and dis-benefits of nine reasonable options for distributing housing, retail and employment development in the District. SA informed an important part of the decision making process. The Council's preferred option provided the best means for improving self-sufficiency of the Towns and Key Service Villages, delivering new affordable housing and directing the pressures from housing away from European protected sites. The SA also recommends mitigation and the submitted Core Strategy has provided mitigation for all potential negative affects except one, which is the supply of housing. The shortfall in housing and social impact on affordable housing has had to be balanced against the overriding environmental impact. Despite this, the Council considers the Core Strategy to provide the best option.

### **Site selection process**

15. The Council objectively assessed housing site allocations through a process of sustainability appraisal and through site based selection criteria. This is a robust process that included seeking advice from external organisations and internal specialists on all of the reasonable sites put forward for consultation. Detail on the criteria, who was involved and what they recommended is set out in the Settlement Extension Sites background paper<sup>11</sup>. An important part of this process was seeking the views of the parish or town council. Where agreement was reached, this was included on public consultation leaflets.
16. The Council decided to maximise the publicity of two key consultations. Firstly, the 2009 'Planning Purbeck's Future'<sup>12</sup> consultation leaflet included options for the distribution of housing and retail development sought the opinion of all residents and businesses in Purbeck. Secondly, the 'Where Shall We Build in Purbeck 2012-2026?' consultation<sup>13</sup> comprised five leaflets setting out the options for specific housing sites, and were delivered to all properties within the appropriate spatial area. We received some complaints of non-delivery and these were remedied immediately.

### **Subsequent plans**

17. The Core Strategy was prepared in the context of PPS12, which allowed councils to use their core strategies as strategic documents that set out the principles for development with the detail passed to lower level plans. Paragraph 153 of the NPPF requires councils to clearly justify the use of additional development plan documents. The Council will pass detail to four subsequent plans: a Swanage Area Action Plan (AAP); a Site Allocations Plan (SAP); a Joint Dorset Heathlands DPD and a Joint Gypsy and Traveller DPD.
18. Work on the Swanage AAP has already commenced. This plan is justified because of the number of complex issues to address in Swanage, including allocating housing sites, health care and retail development. It is the ambition of Swanage Town Council that the AAP may become a neighbourhood plan.

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<sup>10</sup> CD30 Volume 4: Development Options

<sup>11</sup> CD32: Volume 6: Settlement Extension Sites

<sup>12</sup> CD17: 'Planning Purbeck's Future' leaflet 2009

<sup>13</sup> CD21-26: Where shall we build in Purbeck 2012-2026?

19. The SAP will cover outstanding issues across the rest of the District outside of Swanage, for example settlement boundary reviews and allocating land for housing and employment, as required by the Core Strategy. Owing to the introduction of neighbourhood plans, the Council acknowledges that detail, which would have otherwise been covered by the SAP, may be covered by neighbourhood plans. Bere Regis Parish Council, for example, has indicated an intention to produce a neighbourhood plan, in which it will allocate land for the 50 houses required by the Core Strategy. This is why the term 'a subsequent plan(s)' has been used throughout the Core Strategy to ensure flexibility as there are a number of alternative plans that could deliver part or all of the detail. The current Local Development Scheme (LDS) can be updated to reflect changing circumstances, however Neighbourhood plans do not need reference in the LDS.
20. The NPPF has introduced a requirement for councils to identify a 15 year supply of Gypsy and Traveller sites. Work has already commenced on the Joint Gypsy and Traveller DPD, which will comply with this requirement. The Council's statement on Matter 5 provides further detail in this respect. The Joint Heathland DPD will provide strategic mitigation that will help deliver housing growth across South East Dorset.
21. The Council acknowledges that there are some issues which have been passed from the Core Strategy to subsequent plans. However, to stop work and revise the Core Strategy to take account of these issues would be unwise because it would result in an unnecessary delay. This would mean that the Council would not have a 5 year supply of housing sites and would have to continue using out-of-date, unadopted local plan policies. Therefore, the Council recognises that the pragmatic approach is to proceed with the Core Strategy supported by subsequent plans.

**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?**

**Housing**

22. The Council's statement on Matter 4 and para 3 (above), emphasise that the Council's housing target has been balanced against the environmental constraints posed by European protected sites. The Habitats Regulations Assessment and Natural England are satisfied that the quantum of housing can be delivered provided that suitable mitigation is put in place. The Council recognises that the housing target is not enough to meet identified needs, but higher levels of housing growth within this sensitive ecological environment would greatly reduce the certainty that mitigation is achievable.
23. The Council expects the housing target to be reached before the end of the plan period and additional growth delivered, provided that suitable mitigation can be achieved. Already, in the first 5 years of the plan period, 1,111 dwellings of the 2,520 housing target have been built or granted permission. Historic trends for infill development (see the Council's statement on Matter 4) and the Council's Character Area Development Potential study<sup>14</sup> show that infill is highly likely to continue to come forward in the plan period. Settlement extensions play an important role in the housing supply by giving the Council control over the location and phasing of

<sup>14</sup> CD108: Character Area Development Potential (2010)

housing development, and through the delivery of a significant supply of new affordable housing and infrastructure. Two of the three allocated settlement extensions have already entered into pre-application discussions with the Council with planning applications expected this year. The Council has also adopted development briefs for the three settlement extensions. These were prepared in partnership with town/parish councils and developers.

## **Employment**

24. The Council's statement on Matter 6 explains how the supply of 35 hectares of employment land will be sufficient to meet projected demand for 11.5 hectares in Purbeck. The Council's strategy of carrying forward existing employment land will provide a flexible choice of sites and locations to prospective employers. The majority of the supply will help meet local needs, with aim of improving the self-sufficiency of towns and key service villages. The majority of employment sites are serviced and being marketed by willing landowners. The Council is confident that the economic strategy is achievable over the plan period.

## **Retail**

25. The Council's retail strategy, as set out in the Council's statement on Matter 7, is to support the vitality and viability of towns and key service villages by meeting all quantitative retail needs within town centres and local centres. The Council's retail consultants have recommended a target for 2,000sqm of non-food floor space and 1,260sqm of food floor space by 2027<sup>15</sup>. The Council has asked the Inspector through the Minor Changes Schedule to revise the food floor space target from 2,000sqm to 1,300sqm to take into account the latest population projections, which are based upon the housing growth set out in the Core Strategy. This change will be consulted upon this summer as part of the modifications consultation.

26. The Council has had pre-application discussions with Co-Op for large proportion of the food floor space in Swanage town centre and there is also interest from a landowner in Upton. The Council has also identified opportunities to expand Swanage and Upton town centres to provide non-food floor space, using sites such as the former Greenridge public house in Upton and in Swanage at the Pierhead (planning application to be determined), and adjacent to the Co-Op. Therefore, the Council is confident that the majority of the retail floor space target will be achieved in Swanage and Upton town centres during the plan period.

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

## **Risks, fallback position and flexibility**

27. The Council considers that the main risks to delivery are associated with housing, retail and employment.

<sup>15</sup> CD149: NLP Purbeck Retail Impact Assessment Further Information November 2011

Housing

28. The main risks to housing are; failure to secure suitable mitigation for European protected sites and a significant reduction in infill sites coming forward following the introduction of new affordable housing policy. Failure of the Core Strategy would also delay the delivery of a large supply of affordable housing needed to help towards current housing needs.
29. The Council's fallback position will be to review delivery in the preparation of subsequent plans and, if necessary, to allocate additional sites in accordance with the settlement hierarchy.
30. There is a wide range of landowners who are likely to bring forward sites for housing, as infill sites or settlement extensions. The Council's SHLAA<sup>16</sup> also shows that there is a large choice of available land for future development. The three allocated settlement extensions are in different land ownerships with different developers. Furthermore, infill delivery has been underestimated and single dwellings, which form a relatively high proportion of past windfall, are exempt from provision of affordable housing. The Council is adopting an open book approach to site viability and the flexible negotiation of affordable housing provision to ensure that housing sites are deliverable. These factors provide the Council with confidence that there is sufficient flexibility to achieve the housing target.

Retail

31. The risks with retail are sites not coming forward and a lack of available town centre sites. There is a heavy reliance on the Co-Op in Swanage expanding and meeting food floor space needs. However, there is only a small amount of floor space to find and the plan period lasts until 2027, so there is time to find alternatives. The Swanage AAP will facilitate retail growth in Swanage and the SAP will be able to look at alternatives. This provides flexibility to find sites.

Employment

32. The risk with employment is sites not coming forward. The developer of Dorset Green has cast doubt over the future of the site to deliver employment growth. However, there is a sufficient supply of other serviced and available employment land. There is also potential to expand the Holton Heath industrial estate if needed. This provides flexibility and choice to prospective employers, encouraging economic growth.

**Triggers for review**

33. Appendix 3: Monitoring contains six specific triggers that would require either a partial or complete review of the Core Strategy. The Council considers that it would be useful to highlight these triggers in Appendix 3 by including them in the table below:

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<sup>16</sup> CD117: Strategic Housing Land Availability Assessment Submitted sites: January 2011



Trigger	Indicator
Early achievement of housing target	On completion of 2,000 <sup>th</sup> dwelling the Council will review the implications for additional housing beyond 2,520 dwellings in relation to the Habitats Regulations
Failure to achieve housing, retail and employment targets	Unlikely to achieve 2,520 dwellings, 2,000sqm non food floor space, 1,300sqm food floor space and 11.5ha employment by 2027.
Failure of mitigation for European protected sites	Rise in net number of visitors to European protected sites or failure to provide nitrate mitigation.
Failure to achieve town centre retail strategy due to lack of sites	Failure to provide sufficient retail provision in town centres and local centres including delivery of a specific site in the Swanage Area Action Plan
Reduced choice of available employment land	Available and serviced employment land falls below a minimum of 11.5ha
Imbalance of housing growth risks failure to improve self sufficiency in each spatial area	Significant imbalance in proportion of development coming forward in each of the five spatial areas
Any significant change in national policy	The Core Strategy is no longer fit for purpose

### Suggested changes for the Inspector to consider

34. The Minor Changes Schedule sets a number of updates to the Core Strategy, e.g. an update of housing targets (change number 26) to reflect development that has taken place over the last couple of years; and population figures (change number 8). There is also a change to reduce the food floor space requirement to 1,300sqm (change number 32). The Council also requests that the table from para 33 above is added to Appendix 3: Monitoring Framework (change number 109). These four changes will be consulted on as modifications to the Core Strategy after the hearings have been completed.
35. The Council will prepare a further modifications schedule ahead of the hearings to highlight changes necessary to align the Core Strategy with the NPPF.