

Purbeck Local Development Framework

Core Strategy Examination

Statement submitted by Savills on behalf of the Redwood Partnership on Matter 1: Basis for the Overall Approach of the DPD (Chapters 1 to 4).

Respondent reference: 4948

April 2012

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Matter 1: Basis for the Overall Approach of the DPD

Issue 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. The Core Strategy has been prepared under the suite of national planning policy statements and guidance that have largely been replaced by the recently published National Planning Policy Framework (NPPF). Two of the key objectives of PPS1 and PPS3, under which the Core Strategy has been drafted, have been delivering sustainable development and increasing the delivery of housing. These are taken forward in the National Planning Policy Framework, which seeks to increase significantly the delivery of new homes (paragraph 107). Central to the draft NPPF is a presumption in favour of sustainable development, with the expectation that local planning authorities should plan positively for new development and prepare local plans on the basis that objectively assessed development needs should be met.
2. The Government is committed to increasing housing supply, and even though Regional Spatial Strategies and associated housing targets are set to be abolished, housing needs will still have to be met and Local Authorities will still have to demonstrate a justifiable, evidence based approach to housing provision. The principles of sustainable development will still apply the need to provide sufficient suitable sites for housing development to meet identified needs will remain.
3. The presumption in favour of sustainable development set out at paragraph 14 of the NPPF means that for plan making, local planning policies should positively seek opportunities to meet the development needs of their area, and that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or specific policies in the NPPF indicate development should be restricted. The level of housing proposed in the Core Strategy falls short of providing sufficient housing to meet identified community needs, despite the availability of suitable sites and locations for development that could be delivered in line with the policies in the NPPF, as a result the Core Strategy fails to meet a cornerstone of national policy.

4. There appears to be a good degree of co-operation between Dorset local authorities on certain cross boundary issues such as the approach to internationally protected heathlands, and it is clear that there has been co-operation on evidence base studies such as the Strategic Housing Market Assessment and its recent update.
5. However, this co-operation does not appear to extend to housing provision across the Housing Market Area. There is no evidence to demonstrate that the overall needs of the Housing Market Area will be met, that the requirement of paragraph 179 of the NPPF for local planning authorities to *work together to meet development requirements which cannot wholly be met within their own areas* has been met, or that the plan has taken account of unmet requirements from neighbouring authorities, as required at paragraph 182 of the NPPF.

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?

6. The overall level of growth proposed across the District falls short of meeting identified needs for market and affordable housing in Purbeck as indicated in the Strategic Housing Market Assessment Update (January 2011) and other indicators such as the latest ONS household forecasts, housing affordability, and the number of households on the housing register.
7. The evidence available points to an increasingly serious housing shortfall and a housing accessibility problem for Purbeck, and the wider housing market area, which will not be addressed by the spatial strategy proposed. It is critical for future generations that the Core Strategy takes a proactive, enabling approach to delivering sufficient land for housing to meet local community and economic needs.
8. Purbeck benefits from a high quality environment, with a variety of landscape, nature conservation, and heritage designations present to varying extents across the district. It is important that these designations are recognised in the plan and their implications reflected in the overall spatial strategy. Within this context there remain opportunities for

sustainable development to meet identified housing and economic growth needs; however these opportunities have not been fully reflected in the overall spatial strategy.

9. Despite the availability of suitable, sustainable and deliverable sites for new housing at Wool and East Burton, which have good transport links, are close to a strategic employment site, are unconstrained by Green Belt or AONB designations, and can deliver high quality SANGS to mitigate potential impacts on heathlands, the Core Strategy has failed to respond positively to the identified needs of the area and the opportunities for growth that are available.
10. The overall approach of the spatial strategy therefore fails to plan positively for new development; has not been prepared on the basis that objectively assessed development needs should be met; does not aim for a balance of land uses within the area, and; does not reflect the presumption in favour of sustainable development. It therefore fails to meet the '*positively prepared*', '*justified*', or '*consistent with national policy*' tests set out at paragraph 182 of the NPPF.

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?

11. The DPD is not based on a sound process of sustainability appraisal and testing of reasonable alternatives. As set out below, consideration of higher levels of growth beyond the 2,520 dwellings proposed in the Core Strategy at locations other than the Western Sector have not been given due consideration. Other alternative growth scenarios have been dismissed prematurely on the basis on an inconsistent approach to the sustainability appraisal and without due consideration to the evidence base. As a consequence the plan does not represent the most appropriate strategy, when considered against reasonable alternatives, based on the evidence available. The plan therefore fails the '*Justified*' test of soundness set out at paragraph 182 of the NPPF.

Sustainability Appraisal of alternative policies on housing supply

12. Section 3.3.6 of the Sustainability Appraisal refers to Sustainability Appraisal testing of alternative policies on housing supply. This purports to include the testing of a growth range of 2,520 to 5,150 dwellings, with commentary and assessment table provided at Appendix 5. However a review of the assessment table, in particular the *protect and enhance habitats and species* criterion would suggest that this assessment appears is based on the potential impacts of the Western Sector at the upper end of the range suggested, rather than a more modest option of bringing forward some additional growth elsewhere in the District such as in South West Purbeck.

13. Such an approach could be compatible with the Habitats Directive provided suitable mitigation is provided, and to be consistent with the SA approach elsewhere, the potential impact of such an approach on habitats and species should therefore be assessed as neutral. The availability of suitable SHLAA sites in South West Purbeck outside the AONB also suggests that such an approach could be delivered without a significant negative impact on landscape, and to be consistent with the SA approach elsewhere, which acknowledges the mitigation provided by the development management process and promotion of high quality design, the potential impact on landscape and cultural and historical assets should therefore be assessed as neutral.

Sustainability Appraisal of 2009 Preferred Options

14. The sustainability appraisal indicates at section 3.3.3 that the options of improving the self sufficiency of several of the Key Service Villages, including the option of up to 300 additional dwellings at Wool, were dismissed in 2009 due to concerns regarding conformity with the RSS at the time. However, paragraph 3.4.2 of the Draft Revised RSS for the South West Incorporating the Secretary of State's proposed changes specifically notes that where there are few towns which meet all the criteria of Development Policy B, districts should identify those settlements with potential to play a more strategic role locally and allocate development accordingly.

15. The criteria set out in the emerging RSS for such settlements include: an existing concentration of employment, with potential for employment opportunities to be enhanced; shopping, cultural, faith, education, health and public services that meet the needs of the settlement and surrounding area; the availability of sustainable transport modes that can be maintained or developed to meet identified community needs in the settlement and the surrounding area.

16. Wool meets all of these criteria and clearly has the potential to play a strategic role locally. It has strong sustainability credentials and is not constrained by Green Belt, landscape or nature conservation designations. The settlement benefits from a range of community facilities including shops, schools, library, and doctors surgery. Public transport provision includes a range of bus services and a railway station on the Weymouth – London line with regular services to Dorchester and Weymouth, Poole, Bournemouth, and Southampton.
17. The growth scenario of improving the self-sufficiency of Wool with approximately 300 additional dwellings has therefore been prematurely dismissed at the preferred options stage of the plan-making process.

Sustainability Appraisal of alternative growth scenarios

18. Section 3.3.7 of the SA refers to the assessment of two further growth scenarios at Wool: 400-600 dwellings, employment and open space at Dorset Green, and; 400-1,000 dwellings, employment, open space, park and ride, tourism, community facilities and primary school at Wool.
19. Whilst the appraisal indicates acknowledges that mitigation measures could be put in place to satisfy the Habitat Regulations for the 400-1,000 dwelling at Wool option, it suggests that impacts on habitats and landscape could have a knock-on effect on tourism and would put additional pressure on the road network, with a lack of containment assessed as a negative impact.
20. It is unclear from Appendix 6 how the 400-1,000 dwellings, employment, open space, park and ride, tourism uses, community facilities and primary school at Wool scenario would have an adverse impact on the tourism potential of the area. Any potential impacts on landscape and nature conservation can be mitigated by careful design and SANGS provision. The proposal being assessed includes tourism uses at a location accessible by a range of transport modes, and should therefore be assessed as having a positive impact on the criterion *harnessing the economic potential of tourism in a sustainable way*.
21. The potential impacts of this scenario on the *Protect and enhance habitats and species* and *protect and enhance Purbeck's unique landscape & townscape, & cultural & historical assets* criteria has also been assessed in Appendix 6 of the Sustainability Appraisal as negative. We contend that potential impacts on habitats and species can

be appropriately mitigated by a range of measures including SANGS provision, and potential landscape impacts can be mitigated through the Development Management Process and the promotion of high quality, sensitive design. The potential impact on these criteria should therefore be assessed as neutral, in a similar manner to the settlement extensions assessed in Appendix 4 of the Sustainability Appraisal.

22. A consistent and objective approach to the Sustainability Appraisal process would not provide any sound reason why the potential for additional growth at Wool has not been taken forward in the plan.

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?

23. The NPPF states that to boost significantly the supply of housing, local authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

24. The 120 dwellings per annum proposed in the plan falls below objectively assessed housing needs as indicated by CLG household projections, the Strategic Housing Market Assessment, the number of people on the housing register, and the market signals such as housing affordability. This would lead to a shortfall of at least 1,000 dwellings over the plan period, despite the availability of suitable, sustainable sites that can be delivered in accordance with the policies set out in the NPPF and without harm to biodiversity, landscape or heritage assets.

25. The proposed timetable for the delivery of the proposed settlement extensions on sites that are currently in the Green Belt is considered optimistic given: current market conditions; land ownerships; the likely timetable for achieving planning consent given the significant unresolved planning issues such as SANG provision, loss of school playing fields and retail provision at Wareham, and; timescale for subsequent discharge of pre-application conditions, s106 obligations, and on-site mobilisation.

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?

26. The first five years of housing supply in the Core Strategy is heavily reliant on a small number of sites that are currently within the Green Belt, with no back-up or contingency. Latter phases of the plan are heavily reliant on character area potential - effectively windfall sites. The changes to paragraphs 6.1.3 and 6.1.4 in the 2011 Pre-submission draft plan have removed the fall back position in relation to potential for longer term growth at Wool. Without allocated sites beyond the first five years of the plan, and with only a very small pipeline of potential future allocations and no contingency, the planning authority has little control over the timing and delivery of new housing and has no flexibility to accommodate unforeseen circumstances.