

Examination of the Purbeck Core Strategy Development Plan Document

Statement of JS Bloor (Newbury) Ltd

Matter 13: North East Purbeck (Policy NE)

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 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.

13.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?

No.

Political sensitivity associated with the previous Regional Spatial Strategy preparation process has resulted locally in Purbeck District Council underplaying the substantial influence and importance of the South East conurbation in everyday life in Purbeck, to the detriment of joined up planning and decision-making.

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.

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 in this location whilst delivering strategically important SANG / green infrastructure.

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 look at various opportunities for sustainable development at / adjoining Lytchett Minster in an objective way.

Lytchett Minster village offers significant opportunity location for growth in view of the range of accessible local facilities that it offers, and the connectivity of the village to the conurbation. By way of example:

- The village sits on major arterial transport routes, including the main Poole / Purbeck bus route
- Lytchett Minster School is a large secondary school serving a catchment from a wide area of Purbeck and Poole, and
- The village has two churches, two public houses, a sports and community hall and sports pitches, but with the potential for greater use of the facilities.

It is considered that there is an obvious decision for further growth at the village to be pursued, which:

- Enhances the sustainability of the village and supports the use and growth of its facilities (by way of a micro example, there is a village centre property with planning permission to be a retail outlet but this is not currently viable due to village size)
- Utilises and builds upon the accessibility of the settlement by a range of transport modes
- Puts homes near a major expanding secondary school, and

- Minimises the distances travelled to work by the majority of working age who will look to the conurbation (and Holten Heath) for local employment opportunities.

Whilst Purbeck District Council has explored a higher growth scenario at Lytchett Minster through an ecological evidence base study, JS Bloor (Newbury) Ltd finds the ‘Implications of additional growth scenarios for European Protected Sites’ evidence base study flawed and therefore not reliable for plan making purposes. Attached to this statement is a critique of the document to fully amplify its concerns.

13.2 Are the requirements related to the housing sites at both Upton and Lytchett Matravers justified and reasonable? Will those developments be viable as set out in policy NE?

No comment.

13.3 Is there any justification for including French’s Farm within the proposed settlement boundary change at Policeman’s Lane?

No comment.

13.4 Is there sufficient evidence to demonstrate that the proposed SANGs are appropriate in terms of size, location and use and can be fully implemented?

There is potential to deliver a strategic SANG at Lytchett Minster as part of a comprehensive approach to growth at this location. Existing areas of woodland within the South Lytchett Estate can offer attractive, high quality greenspace that can intercept existing recreational trips with an origin in the conurbation, as well as avoiding and mitigating impacts of new growth at the village.

Other mitigation-related principles that would inform the master planning of a strategic development would need to ensure that:

- No residential development falls within 400m of European protected heathland
- Development includes a comprehensive sustainable urban drainage system
- Development retains hedgerows and wet and marshy habitats, and other transition areas likely to be of value as foraging habitat for bats and important bird species, and
- The mitigation package includes an education / community liaison element.

13.5 Is the Council's approach towards the modification of the green belt boundary in North East Purbeck appropriate and adequately justified?

No.

Purbeck District Council has not had regard to accommodating additional growth to meet objectively assessed development requirements within or beyond the plan period. In reviewing green belt to accommodate only the current proposed allocations, the Council is not setting boundaries that are capable of enduring beyond the plan period (contrary to the guidance in NPPF paragraph 83).

The opportunities for promoting sustainable patterns of development by channelling development towards Lytchett Minster needs to be considered as part of a review of the green belt in this area. Development in this location has the potential to accommodate Purbeck requirements together with cross-boundary needs of the wider conurbation.

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

A review of the Purbeck Core Strategy evidence base study

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.

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