

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

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

#### **Matter 15: South West Purbeck (Policy SW)**

##### **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.

15.1 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 comment.

15.2 Wool displays a number of credentials in terms of sustainability and the document entitled 'Implications of additional growth scenarios for European Protected Sites' concludes that it seems likely that an additional large allocation of housing at Wool will be less environmentally damaging than at Wareham or Lytchett. What is the justification for not proposing a higher level of residential and/or employment growth in or close to the settlement of Wool?

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. This evidence base study is not reliable for plan making purposes. For example it does not offer rigorous evidence about the opportunities for delivering good quality SANGs in the district, which would offer the best potential to mitigate the impacts of additional growth and / or existing recreational impacts.

There is insufficient rationale provided for the spatial development strategy for the District having regard to paragraph 84 of the NPPF. Purbeck District has not properly considered, for example, the opportunities for promoting sustainable patterns of development by channelling development towards Lytchett Minster in close proximity to the South East Dorset conurbation versus a strategy of distributing growth towards locations such as Wool beyond the outer Green Belt boundary. JS Bloor (Newbury) Ltd's comments on the suitability of the Lytchett Minster area for development are amplified in its Matter 13 statement.

**‘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.