



Purbeck Core Strategy Development Plan Document

Examination into the soundness of the plan

Statement on behalf of Purbeck District Council

Hearing date: Wednesday 16 May 2012 – 10am

Matter 15: South West Purbeck (Policy SW)

Issues

- 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?
- 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?

Introduction

1. This statement considers all the issues within Matter 15: South West Purbeck (Policy SW).

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:

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?

National Guidance

4. Policy SW: South West Purbeck was written to be consistent with national guidance in Planning Policy Statement (PPS) 1: Delivering Sustainable Development, which has now been deleted. The PPS required development plans to contribute towards the delivery of sustainable development through the achievement of social, economic and environmental objectives. The policy for growth and change in the South West Policy Spatial Area reflects this approach by focusing development in the most sustainable settlements, reducing the need to travel by car and the subsequent impact on climate change. The policy also sets out an integrated approach to achieving sustainable development by addressing a range of social (housing, education, community facility provision), economic (employment provision) and environmental objectives (habitats and wildlife, green infrastructure and transport).
5. The NPPF, which supersedes PPS1, sets a presumption in favour of sustainable development. Policy SW: South West provides a clear local policy to ensure the delivery of sustainable development within the South West Policy Spatial Area of the district (as set out above) whilst fully taking into account local circumstances and the area's relationship with the rest of the district.

Local Needs

6. Wool and Bovington are identified in Policy LD: General Location of Development and Policy SW: South West as Key service villages. These villages support the highest level of population outside of the towns including important facilities such as a school and doctor's surgery, and act as a hub to surrounding settlements reducing the need to travel. Key service villages are therefore considered suitable for some limited growth due to their sustainable location and role as a hub. Limited growth would also help to sustain vital rural services and facilities, for example the local school and doctors surgery, helping to reduce the need to travel within the wider rural area and supporting local shops and businesses. Bovington is heavily constrained by surrounding heathland, had no sites promoted through SHLAA¹ and

¹ CD117-118: Strategic Housing Land Availability Assessment Submitted sites: January 2011

already has an unimplemented housing allocation to meet the needs of the Ministry of Defence.

7. The settlement strategy identifies Winfrith Newburgh and West Lulworth as 'Local Service Villages', which need some small-scale growth to sustain vital rural services. The villages of Chaldon Herring, East Burton, East Lulworth, and Moreton Station are all identified as 'other villages with a settlement boundary', within which some appropriate small scale development would be considered.
8. Background Paper 4² sets out 9 development options for growth across the district. Officers assessed each option in detail and all were considered to be reasonable taking into account the [previously] emerging Regional Spatial Strategy (RSS), the settlement strategy³, existing housing completions and commitments (planning permissions), retail and employment provision, and the large number of constraints within the district. Of the 9 options assessed in detail, the Council considered the following 3 to be most appropriate for consultation⁴: (i) distributing development around Swanage, Upton, Wareham and the Key Service Villages of Bere Regis, Lytchett Matravers and Wool; (ii) concentrating growth on the edge of Wareham and (iii) focusing growth at Swanage. An alternative option assessed was to improve the self-sufficiency of Wool with a large-scale development of 300 dwellings. This option was discounted as the sustainability appraisal had concerns about the potential impact on rural heaths.
9. Consultation results indicated clear support⁵ (67% of responses from an 8% overall response rate) for the distribution of development around the District's towns of Swanage, Upton and Wareham and the Key Service Villages of Bere Regis, Lytchett Matravers and Wool. This approach, together with Policy LD: General Location of Development will ensure that affordable housing is delivered in each spatial area addressing one of the district's biggest issues.
10. The 'Where shall we build in Wool and Bovington 2012 – 2026?'⁶ consultation considered 4 options for the development of 50 dwellings in Wool. The Parish Council supported a site behind the 180 dwellings being built at Purbeck Gate. However, Dorset County Council could not support the site access would be difficult with the site lying adjacent to proposed route for the Wool bypass. Wool Parish Council did not support any of the other sites under consideration. The Parish Council argued that the 180 dwellings being built at Purbeck Gate from 2006 onwards more than met the village's share for the plan period. The Council supported the Parish Council reasoning and the proposed settlement extension of up to 50 dwellings was removed from the Core Strategy. The Wool Parish Plan states that the majority of residents want Wool to retain its village status. Any future housing developments should be to meet the housing needs of the parish and should be small scale, conforming to the general character of Wool. The submitted Core Strategy has the support of Wool Parish Council.
11. Dorset County Council is working on a review of school places in Purbeck, due to falling school rolls. The Council has worked alongside DCC to ensure that growth in

² CD30: Volume 4: Development Options

³ CD36: Volume 10: Settlement Strategy

⁴ CD16: Core Strategy Preferred Options 2009 ('Planning Purbeck's Future')

⁵ CD17c: Responses to development options and supermarket responses

⁶ CD25: Where shall we build in South West Purbeck 2012 – 2026?

the South West Policy Spatial Area continues to support future school rolls and maintain the presence of viable schools within the key and local service villages. This has a number of social and environmental benefits by maintaining the accessibility of education in the South West Spatial Area and minimising trips to alternative schools further afield.

Economic, Social and Environmental Impact

12. The Sustainability Appraisal (SA)⁷ notes that development in Wool and Bovington is expected to generate some positive effects in relation to the viability of local services and the provision of new affordable housing. However, the SA also notes that the given the scale of development proposed, constraints with the road network and the relatively small local workforce, growth is unlikely to be generated at Dorset Green Technology Park. In terms of negative effects, although not significant, any new development is likely to increase waste production, land, water, air and light pollution and water and energy consumption both during construction and occupation.

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?

13. There are three main reasons why large scale growth at Wool has not been included in the Core Strategy, which are discussed below:
- Recent large scale development /public consultation
 - Constraints posed by European protected sites
 - Employment needs and location
 - Transport constraints

Recent large scale development /public consultation

14. As discussed above, the Council considered large-scale development at Wool during the Core Strategy process and decided that the current large extension of Wool, at Purbeck Gate, will provide sufficient housing growth in the village for the plan period. Section 3.3.7 of the Sustainability Appraisal highlights some economic and social benefits of large-scale growth at Wool, but there are environmental concerns from development impacts and lack of self-containment of Wool.
15. The Core Strategy has been prepared under the direction of the [previously] emerging RSS, which did not mention the economic redevelopment potential of the Dorset Green site (formerly Winfrith Technology Centre). The RSS had an urban sustainability focus and therefore preliminary work on growth options⁸ by Bournemouth, Poole and Dorset Councils, focused on South East Dorset (the Poole and Bournemouth conurbation extending south-west to Wareham). The Panel was aware of representations from the Redwood Partnership and Lulworth Estate who collaborated to prepare a 'Wool Vision' calling for large-scale economic growth

⁷ SD15: Sustainability Appraisal for Proposed Changes to Core Strategy Pre-Submission 2011

⁸ CD140 South East Dorset Joint Study Area Reports

linked to housing. However, the Panel instead chose Area of Search 7B at Lytchett Minster to meet the housing shortfall in the South East Dorset sub region. In addition, Wool was not considered as a location to meet growth in the Weymouth and Dorchester sub region.

16. The Lulworth Estate and Redwood Partnership (two landowners at Wool) have now abandoned their 'Wool Vision' and instead are each promoting their land separately. This means that there is no proposal on the table for a large development that can provide housing, economic growth and suitable mitigation. This lack of coordination, along with doubts over the ability of the Dorset Green Technology Park to attract inward investment, the limited reliance upon Dorset Green in the economic strategy, doubts over the deliverability of transport mitigation and the mitigation of European protected sites, has led the Council to rewrite para 6.1.4 of the Proposed Changes to the Pre-Submission Core Strategy. This was intended to remove any false expectations to landowners / developers and to provide greater certainty for local residents and businesses. Employment development at Dorset Green is not considered to be of such strategic importance to Purbeck that it would justify setting aside other sound land use planning policies.

Constraints posed by European protected sites

17. Government Office for the South West⁹, in response to the Core Strategy Preferred Options (2009), raised the possibility of linking housing growth in Wareham with economic growth at Dorset Green. In response, the Council commissioned ecological consultants to prepare the study entitled 'The Implications of Additional Growth Scenarios for European Sites'¹⁰. The Study 'cautiously ruled out' growth west of Wareham on environmental grounds, but 'cautiously suggested' that 1000 dwellings could be considered at Wool, with suitable alternative natural green space (SANGs) to the south of Wool and other mitigation measures. Paras 2.70-2.74 of the Study recognise the potential of 100ha of SANGs at Coombe Wood and the fields to the east of the wood (as shown on Map 7 of the Study). The Study also recommended that further work is necessary to ensure the SANGs effectiveness to mitigate the proposed housing growth. Para 2.75 of the Study dismisses the potential of alternative SANGs promoted by ZBV (Winfrith) Ltd due to lack of attractiveness and accessibility.
18. The Study was completed in September 2010, when the Pre-Submission Core Strategy was being agreed by councillors, and therefore too late in the process for a major change in policy direction. At the time, the Council benefitted from public support for the housing strategy, the Local Plan was about to expire and the Council was faced with the possibility of not having a five-year land supply. The Council could have chosen to delay the Core Strategy in order to undertake the technical work that would have been required to further explore growth at Wool. However, this would have led to 'planning by appeal' and risked losing the public support for the Core Strategy. The Council therefore took a pragmatic decision to publish the Pre-Submission with the agreed housing target and distribution strategy.
19. Following the Pre-Submission it was clear from representations by Natural England that the Core Strategy needed to include greater detail on mitigation of the impacts of housing growth on European protected sites. As part of this work, the Council's

⁹ CD100 GOSW response to Core Strategy Preferred Options 2009

¹⁰ CD112 HRA Implications of additional growth scenarios for European Protected Sites (2010)

ecological consultants were invited by ZBV (Winfrith) Ltd to re-assess their SANGs proposal. The ecological consultants, in liaison with Natural England, restated their previous advice to the Council that they did not think the SANGS would be effective.

20. ZBV (Winfrith) Ltd submitted a pre-application proposal to the Council in December 2011 for 700 dwellings (on greenfield land), 70,000sqm of new employment floor space and other facilities, accompanied by more detailed SANGs proposals. In response, Natural England raised concerns that a public footpath from the proposed housing development would lead people through the SANGs onto protected heathland, which could encourage access to heathland rather than divert access. Therefore, ZBV (Winfrith) Ltd has yet to provide the Council with a suitable mitigation scheme that could be effective.

Employment needs and location

21. The Council's statement in response to Matter 6 sets out the Council's economic strategy. Whilst the Council recognises the opportunities offered at Dorset Green, it does not consider the site to be critical to the achievement of the Bournemouth, Dorset and Poole Workspace Strategy¹¹, since significant alternative opportunities are available around Purbeck, including at Holton Heath. The 2008 Workspace Strategy identifies a local employment need of 5 hectares and a further 15 hectares protected for inward investment.
22. The Council is concerned that Dorset Green may be too remote to attract significant employer interest. Whilst there is available supply at Dorset Green, even with significant investment and new homes locally, there may not be the required demand to attract business to this locality. ZBV (Winfrith) Ltd has not been able to provide evidence to the Council that there are businesses interested in relocating to, or expanding on the site. The Council has offered on several occasions to assist in funding, on a joint venture basis, the erection of new or the conversion of existing buildings to provide small or managed workspace focused on small local knowledge based businesses. This offer remains open and it is highly likely that additional partnership funding could be made available from the Dorset Economic Partnership that has secured 'Growing Places' funding, which is available for kick starting entrepreneurship schemes of this nature, and can return the money in future years for investment in further schemes.
23. The vacant land at Dorset Green has been available for employment growth through a series of different landowners for a period of about 20 years. While there has been some limited success in attracting new or nurturing existing businesses over this period, overall progress has been patchy, despite the significant marketing efforts of the existing landowners. This is in contrast to significant take up of employment land and premises throughout Purbeck, most notably at Holton Heath Industrial Estate, which has enjoyed some significant employment development during this period. Three large employment developments are being currently being progressed at Holton Heath by: Norco GRP (fibre glass mouldings for boats), Heatric (heat exchange units) and Anglo American Oil Co (specialist oil depot) which have a combined floor area of 8,252sqm and will provide 133 new jobs.

¹¹ CD96 SWRDA Workspace Strategy 2008

24. Whilst the provision of new employment space at Dorset Green could be linked to the provision of housing on the site through a Section 106 Agreement, the occupation of such employment space could not be enforced and may not be achieved. The Council is also concerned about the lack of facilities in Wool to ensure the self-containment of such development and the level of resulting future out-commuting. A key part of the sustainable transport strategy for Dorset Green is based on a largely self-contained community where residents work locally. Without self-containment, the basis for seeking to develop housing here would have little justification and merely generate more out-commuting to jobs elsewhere in the main towns and the conurbation of Poole and Bournemouth. As far as the Council is aware, the 180 dwelling scheme at Purbeck Gate, Wool has not generated any economic investment at Dorset Green.
25. Officers approached both West Dorset District Council (WDDC) and Borough of Poole (BoP)¹² to establish if Dorset Green has a role to play in meeting cross boundary employment needs. The location is too rural for BoP's needs and WDDC have no need for the employment site as they are proposing to bring forward new employment growth at nearby Crossways, as part of a proposed large settlement extension.
26. The future use for Dorset Green is more likely to be as a base for locally grown businesses, which would be assisted by investment in suitable small workspace on the site. An alternative longer term employment option could be to increase the allocation of land at Holton Heath, which is located in a more accessible position to both the strategic road network and rail network to Poole, where there is significant interest from prospective businesses and is not unduly constrained for employment purposes. The expansion of Dorset Green is hampered by highway infrastructure constraints, which are exacerbated by the level crossing at Wool.

Transport constraints

27. There is no certainty over the deliverability of a Wool bypass, or alternatives such as on-line bridging or tunneling, that would reduce the traffic congestion experienced at the Wool railway crossing when the barriers are down. The proposed Local Plan bypass route, to the north of Wool, would have significant detrimental environmental impacts on the designated water meadows and would also be extremely expensive (estimated at £17.3M in 2008). Such significant infrastructure would rely upon major scheme funding. Dorset County Council was unsuccessful in 2006 in a bid for regional funding for the A35 / C6 improvement including the southeast Bere Regis and Wool bypasses. Furthermore, Dorset County Council was advised that Purbeck would be unlikely to receive funding of this nature in the foreseeable future. As a result, Dorset County Council has therefore not included the bypass proposal within the Local Transport Plan 3 (2011 - 2026)¹³.
28. Page 52 of the Local Transport Plan 3 Strategy Appendices¹⁴ includes the area strategy for Purbeck. This retains the aspiration for a grade-separated crossing of the railway at Wool, but recognises that it will not be delivered within the plan period

¹² SD25 Purbeck Core Strategy Duty to Co-operate Statement and Purbeck District Council response to question from the inspector regarding the duty to co-operate - <http://www.dorsetforyou.com/media.jsp?mediaid=171455&filetype=pdf>

¹³ CD157 Bournemouth Poole and Dorset Local Transport Plan 3 (2011-2026)

¹⁴ CD157a Bournemouth Poole and Dorset Local Transport Plan 3 - Appendices

up to 2026. In response, the Council deleted the safeguarded route from the Proposals Map in the Core Strategy Proposed Changes.

29. Network Rail will be undertaking re-signalling work between Wool and Poole during the Winter 2012 - Spring 2013. This should result in a reduction to the barrier down time at the level crossing and therefore a corresponding reduction in traffic queues. Dorset County Council will undertake traffic queue length surveys before and after the re-signalling works are completed to assess the impact of the works at the level crossing. Until this work is complete, Dorset County Council is unable to advise the Council on the level of any further mitigation, which might be required at the level crossing. Significant housing development in the Wool area are likely to significantly increase the queues at the level crossing at peak periods, therefore, any such proposals will have to demonstrate how those impacts will be mitigated by that development.

Further work on potential growth in South West Purbeck

30. The Council, under the duty to co-operate, will be working with West Dorset District Council on its proposals for Crossways, which borders with the South West Purbeck spatial area. This work is expected to involve new transport infrastructure in Purbeck District, which will sustainably link the proposed settlement growth to Moreton railway station. The WDDC growth proposal could provide the Council with an opportunity to review growth in South West Purbeck at either Wool or Crossways/Moreton Station.

Suggested changes for the Inspector to consider

31. Update as per changes 38-44 of the Minor Changes Schedule¹⁵.
32. In addition add to Policy SW:

“New employment development will be focused at Dorset Green Technology Park to provide both local and wider job opportunities, supported by improved public transport links with Wool. The existing allocation will be safeguarded on the Proposals Map and reviewed through a subsequent plan(s).”

¹⁵ SD26: Minor Changes Schedule