

Purbeck Local Development Framework

Core Strategy Examination

Statement submitted by Savills on behalf of the Redwood Partnership on Matter 15: South West Purbeck (Policy SW).

Respondent reference: 4948

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Matter 15: South West Purbeck (Policy SW)

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?

1. 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.
2. For the South West Purbeck area in particular, it is noted that the revised Map 5 (change no. 25 in the Minor Changes Schedule) indicates that there are currently 657 households on the housing register (November 2011), whilst the plan only proposes to deliver 30 affordable dwellings.
3. The evidence available points to an increasingly serious housing shortfall and a housing accessibility problem for Wool and the surrounding area, Purbeck, and the wider sub-region, which will not be met by the proposed Policy SE. 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.
4. 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.
5. Policy SW 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 tests set out at paragraph 182 of the NPPF that the plan should be: *'positively prepared'*; *'justified'*; and *'consistent with national policy'*.

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?

6. There is no meaningful justification in planning terms for not proposing a higher level of residential and/or employment growth at or close to Wool and East Burton. The reasons given by Purbeck District Council for not proposing further development at Wool are housing need, settlement hierarchy, and transport. The need for additional housing beyond current consents and windfall sites is clear from the evidence base available. The suggestion that Wool is not at the appropriate level in the settlement strategy to accommodate additional growth does not stand up to scrutiny. Whilst parts of the highway network in Purbeck suffer from traffic congestion at peak times, new development can help to facilitate transport infrastructure improvements, and sustainable transport modes are available from Wool, giving people a real choice about how they travel.
7. Each of these issues are addressed in the following paragraphs, the clear conclusion being that the Core Strategy has failed to plan positively for new development; has not been prepared on the basis that objectively assessed development needs should be met, and; does not reflect the presumption in favour of sustainable development.

The need for a strategic approach to Wool and East Burton

8. A strategic approach to the long term planning of the Wool area, including East Burton and the Dorset Green Technology Centre, is needed to address housing, employment, and infrastructure needs and avoid the problems associated with piecemeal development. The case for considering the Wool area as a strategic location for development is summarised as follows:
 - Wool has good transport links, including a station on the Weymouth to London mainline railway.
 - It is not within the Green Belt or AONB and does not have the same level of environmental constraints that limit growth in other areas of Purbeck.

- It has a good range of services and facilities.
 - There is significant employment growth planned for Dorset Green Technology Park.
 - The Core Strategy fails to balance the planned jobs with new homes, services, facilities and transport improvements needed to make it sustainable and the Area Action Plan which was originally proposed as a way of addressing these issues appears to have been abandoned.
 - Suitable sites are available for development, as identified in the SHLAA and the 'Where shall we build in Wool' consultation.
9. Savills has for some time been highlighting the need for a strategic approach to the long term planning of the Wool and East Burton area. In 2005 Savills, on behalf of the Lulworth Estate and Redwood Partnership, prepared *Wool – Vision for a Sustainable Community*, a copy of the document has been submitted alongside previous representations. This report considered the economic, environmental and social issues facing the area and set out a long term vision, masterplan and regeneration strategy for Wool and Winfrith based on a thorough investigation of the needs of the area and the District as a whole.
10. The Redwood Partnership has further developed proposals for its landholdings in the area in an illustrative masterplan submitted to the Council in response to consultation on the SHLAA in November 2007, a copy of which has been submitted alongside previous representations. It demonstrates the potential for Wool and Winfrith to develop as a sustainable community, and when considered alongside the emerging masterplan for significant jobs growth at Dorset Green Technology Park, provides a strong case for the identification of Wool as a location for balanced housing and employment growth.
11. An Enquiry by Design Exercise undertaken by the Princess Foundation for the Built Environment for the new owners of the Winfrith Technology Centre (since re-branded as Dorset Green Technology Park) in 2008 highlighted the need to improve links and better integration between Wool, East Burton, and Dorset Green Technology Park, and the opportunity to create a sustainable community with new employment, housing and open space provision.
12. Purbeck District Council's consultation on *Where to Build in Wool* identified a number of options for a settlement extension for 50 dwellings at Wool that could be developed without major impact. Representatives from Savills and the Redwood Partnership

attended a public consultation event hosted by the Council in Wool on 5 July 2010 and presented a set of 4xA1 display boards which included a site assessment and a preliminary masterplan for land at East Burton Road (Site A in the *Where to build in Wool* consultation) to accommodate 50 dwellings. The consultation response gave a clear mandate for the allocation of this site.

13. The draft Core Strategy that was presented to the Council at the special committee meetings on the 5th and 12th October 2010 included provision for a settlement extension for 50 dwellings at Wool, with the location to be identified through the Site Allocations Plan.
14. At the 12th October committee meeting, Councillors resolved to remove the proposed 50 dwellings for Wool from the Core Strategy as it was considered that the Purbeck Gate development had met housing growth requirements for the plan period. There is no evidence to justify this position. The site for the Purbeck Gate development was originally identified in the 1997 Purbeck District Local Plan Deposit Draft in order to help meet housing requirements to 2011. The site has since been taken forward through the various stages of the planning process and is now nearing completion. Housing need in the Wool area remains a critical issue, with 565 households currently on the housing register in the South West Purbeck area.
15. As part of the evidence base for the Core Strategy published in November 2010, the work commissioned by Purbeck District Council to examine the potential for additional housing development at several key locations in the District, including Wool, was published in the Additional Growth Scenarios Report (Footprint Ecology, 2010). This highlights that due to the environmental constraints present in the District, Wool is the only location with the potential to accommodate additional growth in line with the Habitats Directive, and that with a range of mitigation measures, Wool could support higher growth and an additional 1,000 houses.
16. Despite the evidence base, the changes put forward in the Core Strategy Proposed Changes to Pre-Submission Consultation reverse the previously stated approach to considering the potential for further growth at Wool, and thereby remove any flexibility or opportunity for subsequent plans to meet the objectively identified growth needs of the area.

Housing provision

17. The need for additional housing over and above the 120 dwelling per annum indicated in the plan is clear from all of the available evidence, and re-enforced by the recent Strategic Housing Market Assessment Update Report (January 2012) which indicates that the forecast need for affordable housing has risen to 520 households per annum and the number of households in Purbeck is forecast to rise by 170 households per year over the remaining part of the plan period.
18. Compared with the latest evidence on household formation and housing need, the housing provision of 120 dwellings per annum in the Core Strategy would result in a shortfall of 1,000 dwellings over the plan period against forecast household formation rates, and a shortfall in affordable housing provision of over 7,000 dwellings, worsening the already acute affordability problems in the area.
19. The additional work to investigate the constraint imposed by Habitats Regulations on further growth potential at Lytchett Minster, Wool and Wareham has been undertaken and has identified Wool as an area where additional growth could be mitigated. The further technical studies referred to in the deleted text of paragraph 6.1.3 have not been undertaken by the council, however work undertaken on behalf of landowners has demonstrated a strong case for growth in the Wool area. The last part of the replacement text proposed at paragraph 6.1.3 that states '*...for other planning reasons, this growth scenario is unlikely to be pursued further*' is therefore completely unjustified.

Settlement hierarchy

20. The Core Strategy Proposed Changes to Pre-Submission states that one of the reasons for not taking forward growth at Wool is its position in relation to the settlement hierarchy set out in Policy LD: Location of Development. The position of Wool in the settlement hierarchy has not changed since the previous consultation, and does not therefore justify the change in approach. Furthermore, the settlement hierarchy does not represent an accurate reflection of the different roles and characteristics of the settlements identified as Key Service Villages. The settlement hierarchy should reflect the potential of settlements to accommodate sustainable growth.
21. Wool has strong sustainability credentials and is less constrained by Green Belt, landscape or nature conservation designations when compared with other key villages

and locations for growth identified in the Core Strategy. Wool benefits from a range of community facilities including shops, schools, library, and doctors surgery. The Core Strategy Background Paper Volume 10: Settlement Strategy illustrates the full range of services available at Wool, there is potential to improve and revitalise many of these to increase self-containment and enhance the settlement's role as a service centre.

22. There is an existing concentration of business and employment at the Dorset Green Technology Centre (formerly Winfrith Technology Centre), with realistic potential for considerable expansion of employment opportunities. Wool lies at a strategic location at the intersection of the A352 and the Weymouth to London mainline railway, with rail services from Wool station to Weymouth, Dorchester, Wareham, Poole, Bournemouth, Southampton and on to London operating hourly and half hourly services at peak times, and bus services to neighbouring towns and village. It also lies on a key north south route between the A31 and A35 and is at a gateway to many of Purbeck's main tourist attractions
23. Several of the Key Service Villages identified in the Cores Strategy function as dormitory / commuter settlements with limited opportunities for employment development and sustainable transport modes. Conversely, the Wool area has a high level of services, good transport links including bus and rail services, and a significant employment site which is allocated for further development. The Wool area has few of the constraints to growth experienced by other settlements in Purbeck, as illustrated at Map 1 of the Core Strategy, and the Additional Growth Scenarios Report (Footprint Ecology, 2010), which finds that the Wool area has the potential to support additional development within the environmental constraints imposed by Habitats Regulations. It is uniquely placed to act as a sustainable and self contained community serving a wider rural area.

Transport infrastructure

24. There is no evidence to support the claim in the Core Strategy Proposed Changes to Pre-Submission that transport infrastructure would be unlikely to support the potential increase in vehicles. On the contrary, a Transport Assessment (BSP Consulting, 2005) concluded that development at Wool would help to address future strategic highway problems which will arise at Wool level crossing by helping to fund improvements.
25. Wool has good transport links including a station on the Weymouth to London mainline railway. Strategic development at Wool has the potential to provide a range of

sustainable transport improvements to help accommodate growth. The transport implications of different options for accommodating growth at Wool need to be fully explored through the plan-making process; the approach set out at Policy SW fails to acknowledge this opportunity.

Recent housing growth at Purbeck Gate

26. It has been suggested that recent housing growth at Purbeck Gate has not led to any increase in employment growth at Dorset Green. Housing at Purbeck Gate has come forward despite the major economic recession and over a time when investment in Winfrith Technology Centre has been lacking and the number of companies and people working there has been in decline.
27. The sale of Winfrith Technology Centre and its re-branding in 2010 as Dorset Green, which is being promoted as a zero carbon employment centre, signals the first step in reversing this decline. The regeneration and expansion of the site has the potential to deliver significant employment growth over the plan period, this should be seen as an opportunity to attract much needed investment into the area and should be a strategic priority for the plan.
28. A number of sites adjoining the settlement boundaries of East Burton and Wool have been included in the SHLAA as suitable sites for housing subject to a review of settlement boundaries. This represents an opportunity to provide a joined-up strategy for the wider area that delivers the functional and physical linkages needed to connect the regeneration of Dorset Green with the surrounding area to provide a genuinely sustainable development that delivers the multiple goals of planning for economic growth, increasing the supply of housing, meeting community needs, and protecting and enhancing the built and natural environment.

Proposed changes

29. In view of its range of services, good transport links, expanding role as an employment centre, and potential to accommodate development within environmental constraints, the Wool / East Burton / Dorset Green Technology Centre area should be identified as a key location for further development.

30. In order to ensure a flexible and responsive supply of land is available, and to make the clear spatial choices needed in the Core Strategy, Policy SW should include the allocation of Land off East Burton Road, Wool (Site A in the *Where to build in Wool* consultation), and a further requirement to deliver a settlement extension of up to 1,000 dwellings to the west of Wool through a subsequent plan.