



**GOVERNMENT OFFICE  
FOR THE SOUTH WEST**

Steve Dring  
Planning Policy Team  
Purbeck District Council  
Westport House  
St Stephen's Road  
BOURNEMOUTH  
Dorset BH2 6EA

**Simone Wilding**  
**Planning Team**  
2 Rivergate  
Temple Quay  
BRISTOL  
BS1 6EH

Our reference: SW/THM/5822/06:1  
Your reference:

Direct Dial: 0117 900 1891  
Fax 0117 900 1906  
E-mail: [Simone.Wilding@gosw.gsi.gov.uk](mailto:Simone.Wilding@gosw.gsi.gov.uk)

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Dear Steve,

**Purbeck Core Strategy – Reg. 25 Preferred Options Consultation**

Thank you for consulting GOSW on the above document. We welcome the work you have undertaken so far to progress this. You have clearly researched the various issues and presented them in a user-friendly document which stimulates a spatial planning approach. While I do appreciate the good level of progress you have made, I have serious concerns over whether or not the suggested preferred option can be justified as the most appropriate one and whether all reasonable alternatives have been considered. I set out below the reasons which have led me to this conclusion.

**1. Level of Housing Requirement and Distribution**

It is positive to see that in section 3.3 you have started to look at the district and how it functions in spatial terms and on this basis developed your spatial strategy. In setting out the characteristics of Purbeck you indicate at paragraph 2.1 that Purbeck is part of the Bournemouth and Poole Housing Market Area and that it falls within the "South East Dorset" [conurbation?]. As set out in the emerging RSS there are at a sub-regional level two main functional areas in Purbeck: a small part which forms part of the South East Dorset SSCT and the area outside the SSCT, the 'rural hinterland'. To ensure conformity with the higher level plan and also to adequately address housing need in your area, it would therefore seem necessary that you develop this further in your Core Strategy. In other words, it would seem necessary to define in greater detail which area within Purbeck forms part of the SSCT and what is considered outside. While you seem to be going in this direction with the identification of the 5 different spatial areas within Purbeck, it is unclear whether the 'North East' area could be considered coterminous with Purbeck's part of the SSCT?

In paragraph 1.14 you indicate that due to evidence that you have produced jointly with Natural England it is unlikely that the Western Sector for 2,750 dwellings included in the RSS Proposed Changes would pass Habitats Regulations Assessment at LDF level. Your authority will need to satisfy itself as well as the examining Inspector that your evidence is sufficiently strong to demonstrate this and to outweigh the emerging RSS which at this stage needs to be taken into account as a material consideration.

Paragraph 1.14 then further proposes to progress the Core Strategy exclusively on the 2,400 dwellings requirement and to distribute this across the entire district. It would seem questionable whether this conclusion is justified as it lumps different functional areas together and thus ignores the housing need arising in the SSCT *in addition to* that of the rural area's needs. In other words, you will need to consider how the housing need of the SSCT that was to be met through the Western Sector is going to be met in a different way. While Purbeck clearly cannot consider all alternatives at SSCT level, you should at least consider *what contribution* Purbeck can make. I.e. what you *can* do and what actions you have undertaken in conjunction with other Local Authorities in the SSCT area to re-assign the housing need that was being addressed by the Western Sector. Unless you can demonstrate that this is being delivered elsewhere in the SSCT – with a reasonable degree of certainty – you cannot simply ignore Purbeck's part in meeting the SE Dorset's SSCT's housing needs.

On this basis it would seem necessary to test an alternative option (also as part of the ongoing Sustainability Appraisal). This would need to identify as many houses as possible within Purbeck's part of the SSCT area that can be accommodated without compromising Habitat Regulations and taking account of wider sustainable development considerations such as transport, access to services etc. In turn the 2,400 dwellings would need to be distributed over the remainder of the district.

In paragraph 1.2.3 you indicate that the Core Strategy consultation is not the place to discuss the level of housing requirement. Given the uncertainty over the strategic planning context for the near future, it may not be helpful to portray the level of housing requirement simply as a requirement of a higher level plan that needs to be fulfilled. This would seem to take the focus away from what is *needed* in the district to achieve your vision and strategic objectives in line with sustainable development principles. The overall level of housing to be provided clearly has a direct impact, in particular on your strategic objective 2, 3 and 8 – and to a lesser degree also the others. If there was no housing figure set by a strategic plan, you would still need to justify any overall housing proposal you put forward against the evidence of *need*, in particular household projections and the SHMA. Furthermore, you would also need to test the implications of different levels of housing as part of the Sustainability Appraisal, taking account of environmental, economic and social sustainability.

## **2. Sustainable Development**

S39 of the Planning & Compulsory Purchase Act 2004 requires local planning authorities to prepare plans with the objective of contributing to the achievement of sustainable development. The UK Strategy for Sustainable Development 2005 commits the UK to pursue sustainable development, to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. In the UK, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible. Your authority therefore needs to satisfy itself, and the examining Inspector, that the Strategy contributes to sustainable development, including the ability of the rising generation to satisfy its basic needs (including housing needs), in a context of social inclusion, sustainable communities and personal wellbeing.

PPS12 sets out in paragraphs 4.39 to 4.43 the policy on sustainability appraisal as it relates to local development documents. This highlights that “the Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability assessment should inform the evaluation of alternatives. Sustainability assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.” I'm concerned that the current phrasing of your housing objective in the SA (under Headline objective: improving health and well-being) does not enable an assessment of whether enough housing is being provided. It would seem to focus too narrowly on the right type of housing and affordable housing and therefore seems inconsistent with PPS3.

The latter clearly sets out at paragraph 10 the specific outcomes which the planning system should deliver including a sufficient quantity of housing. For a housing objective phrasing which would enable an assessment of the alternatives that is consistent with PPS 3 you could, for example, refer to the SA Report for the RSS. This uses the same high level objectives as your SA, but with respect to housing asks: does it “help make suitable housing available and affordable for everyone?” For further guidance on the Sustainability Appraisal of your plan please refer to the on-line plan making manual which formally replaces previous guidance on this matter: <http://www.pas.gov.uk/pas/core/page.do?pagelId=152450>

### **3. Spatial Strategy: Balancing Homes, Jobs and Access to Services**

This is not only a key spatial policy driver in the emerging RSS as set out in the settlement hierarchy, but also a fundamental sustainable development principle which runs through national planning policy including e.g. PPS1 (para. 5 and 16), PPS3 (para 10 and 38), PPS 7 (para 3), and PPG13 (para 14). Purbeck has two existing strategic employment locations:

- 1) Winfrith Technology Centre (70ha in total, 20ha expected to come forward over plan period) and potential to accommodate an additional 3,000 jobs according to its promoters; and
- 2) Holton Heath/Admiralty Park (47ha in total, 13ha expected to come forward by 2026).

Since these are existing, commercially functioning locations these would seem ‘fix points’ around which the housing distribution needs to be explored to come to a view which distribution would represent the most sustainable option. In order to do this it would be helpful if you showed on a map the ‘sustainable catchment area’ of these 2 sites, e.g. what falls within a 20 minutes cycle distance, a reasonable public transport commute etc. Furthermore, given Wareham being the nearest ‘settlement B’ category centre to Winfrith it would seem particularly relevant to consider whether and how you can provide a sustainable link between Wareham and Winfrith so that you could justifiably argue that housing in Wareham is sustainably serving jobs at Winfrith.

Given Wareham’s central location in the district, it would appear to provide the best accessibility for the whole of the district for the provision of higher order services. It would seem that Wareham is already fulfilling this function being the district’s administrative heart and the location of the secondary school. Having a large proportion of the new housing proposed for rural Purbeck concentrated at Wareham, would therefore seem the most appropriate location in terms of reducing the need to travel through choice of location. Getting the strategic development location right is absolutely critical in setting the tracks in the right direction for sustainable travel patterns and to facilitate sustainable communities. This underlies the national planning objectives cited above and has been further demonstrated recently in “Planning for Sustainable Travel”, a guide by the Commission for Integrated Travel<sup>1</sup>. In paragraph 7.5.1 you indicate that all three options comply with national and regional policy, but indicate in the following sub-paragraph (2) ‘protecting and enhancing the natural environment challenge’ that: “Alternative Option A is of particular concern and mitigation may not be achievable”. As in sustainable travel/creating sustainable communities terms concentrating growth at Wareham would seem to be substantially preferable, reasons to outweigh this consideration would need to raise even greater sustainability concerns. It would therefore seem necessary to explore further whether and how a more substantial extension to Wareham could be accommodated at Wareham, while at the same time ensuring that this can be done in line with Habitats Regulations.

### **4. Strategic/Spatial Objectives**

It is positive to see a relatively strong read-across between the five main challenges identified in section 3.2 and the spatial objectives set out in section 4.4. It would, however, be preferable for these to be referred to as ‘Strategic Objectives’ to ensure consistency with PPS 12 which in paragraph 4.1. (2) lists ‘strategic objectives for the area’ as one of the critical elements that Core Strategies must include. You could also further strengthen your Core Strategy and the strategic objectives by making them clearer and more focused. E.g. 1, 6 and 7 all seem to be highlighting different aspects of the same objective. On the other hand it seems surprising not to see mitigating against/adapting to climate change highlighted as

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<sup>1</sup> <http://www.plan4sustainabletravel.org>

one of the key challenges and 'only' in place 5 amongst the strategic objectives (are these in priority order?). To ensure consistency with PPS1 and its supplement 'Planning and Climate Change' this would seem to merit better reflection in the Core Strategy (i.e. highlighting climate change as a key challenge and setting out mitigation as well as adaptation to Climate Changes as strategic objective). In this vein each objective would seem to benefit from drawing out the key aspects that you are seeking to achieve (preferably in priority order) to provide a hook for the implementation and monitoring framework. E.g. for Strategic Objective 2 it would seem necessary to clarify that Purbeck's housing need consists of 2 elements: a) rural Purbeck's need and b) Purbeck's part of the SSCT need (as elaborated above under 1).

With regards to monitoring you have made a good start in setting out indicators which you consider relevant to each of the strategic objectives. In going forward you should develop these further into a SMART framework for each of the strategic objectives. I.e. setting out not only the indicators, but also the targets and key, time-related milestones and considering when contingencies would be triggered (e.g. Poole Core Strategy contains good examples). To demonstrate that your plan is realistically deliverable you also need to indicate priorities, who, delivers what by when (should be known for the priorities, or at least there should be a reasonable prospect of it being realistic). You also need to ensure that the CS is sufficiently flexible to be able to react to potentially changing circumstances. You may also want to consider narrowing down the range of indicators you want to use to ensure that your monitoring framework is focused and manageable.

### **5. Vision**

You have clearly put a lot of effort in identifying a locally distinctive vision which takes forward the aspirations of the Sustainable Community Strategy and the aspirations of the community expressed in previous consultations. In particular, the area-based visions work well to provide greater detail on how the different parts of the district are proposed to develop. Arguably each of the area visions (some more than others) need to become more succinct, focused and clear in what is being aspired to. More importantly these still need to relate more directly to the overall vision for Purbeck. In other words, the Purbeck vision needs to capture the key elements of the individual areas, e.g. refer to the key towns and their roles within the district, and show how these will work together. It would seem that as part of that it would also include the role of the A351 corridor taking away the need to list it separately.

### **6. Green Belt**

I understand from our meeting on the 18 November 2009 that the Green Belt boundary in Purbeck seems substantially less straight forward than suggested in paragraph 8.3.4. In particular, there are several material considerations which seem to suggest that the Green Belt boundary as set out in the Local Plan needs reviewing:

- Policies from the BDP Structure Plan relating to Green Belt were accidentally not saved.
- The southern boundary as currently defined appears to be simply 'the edge of the map' rather than a logically defined area in accordance with PPG2.
- Different options for settlement extensions to Lytchet Matravers.

While the proposed approach would seem a pragmatic way forward, it could be made out to be avoiding some difficult choices which need to be made in the Core Strategy. You may therefore want to consider setting the Green Belt boundary in the Core Strategy, which may also take away the need for a subsequent Site Allocations DPD in the short to medium term. In this case the argument whether or not to set the Green Belt boundaries in the Core Strategy or in a sub-sequent DPD therefore seems finely balanced. While setting them in the Core Strategy would seem more onerous and time-consuming in the short-term, it would appear to be the 'cleaner' and possibly also quicker option in the medium-term.

### **7. Implementation and Delivery**

As PPS 12 highlights in paragraph 4.1 (3) and 4.4 respectively a delivery strategy which sets out how you are going to achieve the vision and strategic objectives is central to the Core Strategy. This needs to set out "as far as practicable when, where and by whom (...) and the resources required have been given due consideration and have a realistic prospect of being

provided in the life of the strategy. If this is not the case, the strategy will be undeliverable". Furthermore, deliverability and flexibility are key considerations in establishing whether or not a Core Strategy is effective – which in turn is one of the 3 fundamental assessments in determining whether or not a Core Strategy is sound (PPS 12 paragraph 4.44). See also my comments above in relation to the need for a SMART monitoring framework for the strategic objectives. Arguably the preferred option which you have currently set out would not seem to lead to your strategic objectives being met. In particular, how are you going to mitigate against e.g.:

- unsustainable travel patterns arising from the dislocation between jobs in Winfrith/Holton Heath on the one hand and homes mainly in Swanage on the other hand?
- the impact on the A351?
- there not being any direct relationship between small scale additional development and viability of rural services?

### **8. Infrastructure (Associated to 3 and 7 above)**

By publication the plan will need to be clear about which key pieces of infrastructure are required to enable the delivery of the spatial strategy, how these are going to be delivered, by when and by whom. Ideally you would also show this on the key diagram. While the consultation document lists a number of schemes (e.g. in policy ATS: implementing an Appropriate Transport Strategy for Purbeck), it is difficult to ascertain their relative importance for delivery and to which degree their delivery is secured. This is particularly important should Purbeck District Council intend to introduce a CIL charging mechanism or alternative mechanism to raise funds from development to contribute to the funding of such infrastructure.

### **9. Cross-boundary Issues**

While you indicate in paragraph 2.1 that Purbeck 'has close associations with the Unitary Authorities of Bournemouth and Poole', the spatial strategy does not seem to reflect this in many ways. Particularly with regards to how you see Purbeck's part of the SSCT developing in future and what this in reverse means for the rest of the district would seem to require much more explicit consideration.

### **10. Dealing with Flood Risk**

To ensure consistency with PPS 25 it would seem necessary to strengthen proposed policy FR: Flood Risk recognising that a sequential approach to locating vulnerable development needs to be undertaken and that normally this will only be allowed in Flood Zone 1. While the last paragraph of the policy goes in this direction, it would seem preferable to make this clear in the first paragraph of the policy. This could also highlight that for housing development such sequential assessment has already been undertaken by your authority and been reflected in the proposed housing distribution.

I hope that you may find these comments useful. Please do not hesitate to call if you have any further queries.

Yours Sincerely

Simone Wilding MSc MRTPI  
Senior Planning Manager  
Dorset and Somerset