

# Purbeck District Council: Core Strategy Examination in Public Submission on behalf of ZBV (Winfrith) Ltd

Reference: 4953

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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?
- 15.1.1 Paragraphs 18 to 21 of the NPPF state that the planning system should encourage rather than act as an impediment to sustainable growth by setting out a clear economic vision and strategy for their area including the identification of strategic sites for local and inward investment to meet the anticipated needs over the plan period. Yet despite this national policy guidance the Council have not identified any allocated sites or settlement extensions for growth within the South West Purbeck area. Policy SW simply outlines that development will be managed within the existing settlement boundaries of Wool, Bovington, Winfrith Newburgh and West Lulworth.
- 15.1.2 As discussed in ZBV's response to Matter 2 (General Location of Development: Policy LD) the Council have already made the decision not to provide for any new growth at Wool through settlement extensions primarily on the grounds that such development would result in unacceptable negative impacts on the protected heathlands. This conclusion appears to have been reflected in Policy SW with the removal of an objective to encourage further development within the existing employment site of up to 20 hectares at Dorset Green Technology Park to support the role of Wool.
- 15.1.3 As Dorset Green Technology Park is currently shown to be outside the settlement boundary for Wool (and deleted as a settlement in its own right in earlier versions of the Core Strategy) it is to be assumed from the wording of

Policy SW that any redevelopment proposals for the site must be strictly in accordance with Policy CO: Countryside. This policy would only allow for restricted development including small scale proposals for rural economic regeneration, community facilities and affordable housing to be considered.

- 15.1.4 It is ZBV's view that in its current format Policy SW will allow for almost no growth or positive change within the South West Purbeck area during the lifetime of the Core Strategy. Most crucially, the policy appears to ignore or purposely impede any potential for growth at one of Purbeck's largest employment sites at Dorset Green Technology Park despite a recognition in section 7.2.7 of the Core Strategy (Vision for South West Purbeck) that the DGTP site plays an important employment role and that it will provide the focus for inward investment of economic growth. The clear failure of Purbeck Council to positively plan for growth and offer support to existing strategic sites in the District (such as DGTP) in this case is demonstrably inconsistent with this national guidance.
- 15.1.5 The DGTP site provides approximately 72 hectares of employment land (equivalent to 50% of the Purbeck's employment land supply). As noted in our earlier representations, it is anticipated that the DGTP site can accommodate a significant proportion of future employment growth for Purbeck (the 2008 SWRDA Workspace Strategy identifies an opportunity to provide 20ha of new employment development). This is reinforced by the GOSW in their letter to Purbeck Council dated 23/11/2009 (see copy attached in Appendix 15.3) when they state that Purbeck has two existing commercially functioning strategic employment sites (i.e. DGTP and Holton Heath) and that these sites should be seen as 'fix points' around which housing distribution "needs to be explored" to come to a view which would represent the most sustainable option. Furthermore, Purbeck Council acknowledged in their 2010 report 'Implications of Additional Growth Scenarios for European Protected Sites' the potential for 1,000 new homes in and around Wool subject to appropriate mitigation measures being put in place.

- 15.1.6 The Council have set out in their 2011 sustainability appraisal for the Core Strategy that a mixed use redevelopment option for the DGTP site was considered which included between 400-600 dwellings. However, this appraisal concluded that the potential negative impacts of such a scheme on the adjoining protected heathlands could not be successfully mitigated. They also claimed that there was insufficient demand for inward investment to encourage a mixed use employment-led development of this scale on the site.
- 15.1.7 As pointed out in earlier representations to the Core Strategy, despite intensive marketing the DGTP site has declined significantly in recent years and without real investment there is a danger of economic stagnation and indeed failure at this strategic site. ZBV have consistently requested throughout all stages of preparation of the Core Strategy that a pro-active / positive policy approach is vital for the site's regeneration yet the latest Core Strategy has sought to further exclude the DGTP site from consideration for any form of substantial growth with paragraph 6.1.4 now stating that *"the delivery of new employment growth at Dorset Green is not essential to the delivery of the Purbeck vision."* This policy approach is entirely inappropriate and is inconsistent with paragraph 19 of the NPPF.
- 15.1.8 Paragraphs 7 to 9 of the NPPF state that in order to achieve sustainable development the planning system should encourage economic, social and environmental gains jointly and simultaneously. This should include ensuring that sufficient appropriate land is available to support growth and innovation, providing housing and accessible community facilities to meet the needs of present and future generations and protecting and enhancing the natural, built and historic environment including moving to a low carbon economy. It is our view that the Council has not properly considered the options for potential sustainable development solutions in the District and that opportunities do exist within South West Purbeck (particularly on the DGTP site) which can demonstrate compliance with NPPF guidance for sustainable development.

- 15.1.9 A detailed Masterplan and supporting evidence base has been developed by ZBV and their design team to bring forward the regeneration of the Dorset Green Technology Park. This is attached in Appendix 1 of this response and includes the creation of a truly sustainable mixed-use development on the site incorporating new business accommodation (to be delivered as a prestige business park focused around high-tech and green industries); new residential accommodation (up to 700 new homes - including new low cost/affordable homes designed to meet local need/demand), alongside new community, recreational, education and tourist uses.
- 15.1.10 To alleviate any potential impact on the nearby heathlands (in particular Knighton Heath) the Masterplan incorporates proposals for a 29 ha Suitable Alternative Natural Green Space (SANGs) alongside other significant new green infrastructure (including new recreation/sports pitches and new areas of accessible open space). This latest SANGs proposal is being developed through discussions with Natural England and Dorset Wildlife Trust. The details of this SANGs proposal are provided in the SANGs report in Appendix 15.2 of this response.
- 15.1.11 Paragraphs 14 of the NPPF states that Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. It is firmly ZBV's view that the emerging Masterplan proposals for the DGTP site can facilitate new employment and housing growth that does not negatively impact on the environment or existing infrastructure. This can in turn provide significant benefits to the District by improving Purbeck's housing supply, widening the choice and affordability of high quality homes, stimulating economic growth and (most importantly) improving the conditions in which people live, work, travel and take leisure.
- 15.1.12 It is therefore considered entirely inappropriate for the Council and contrary to Paragraph 17 of the NPPF, which states that local authorities should proactively drive and support sustainable economic development, to

continue to dismiss the growth potential of South West Purbeck within Policy SW and particularly to neglect the opportunity for sustainable regeneration at the Dorset Green Technology Park. ZBV consider that the 'Vision for South West Purbeck', Policy SW and the Core Strategy (as a whole) should explicitly support and reference the potential for sustainable growth at the DGTP site.

- 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?
- 15.2.1 Since the publication of the earlier 'Pre-Submission Draft Core Strategy' (in October 2010), we are aware that the Council investigated the opportunity for strategic housing growth proposals at Lytchett Minster, Wool and Wareham. As highlighted by the Inspector above, although the Council's 2010 report cautiously suggests that 1,000 new homes could be accommodated around Wool (with the introduction of suitable mitigation measures to protect nearby protected heathlands).
- 15.2.2 We understand that the conclusions have not been taken forward by the Council because the Core Strategy had developed too far. However, this is inconsistent with paragraph 153 of the NPPF which requires local plans to be reviewed in whole or part to respond flexibly to changing circumstances.
- 15.2.3 As outlined in our previous representations to the Core Strategy, ZBV strongly contend that the Council have dismissed significant opportunities for additional housing and economic growth on potential development sites within the District (particularly at the DGTP site) without the necessary level of analysis to demonstrate their unsuitability.

15.2.4 Paragraph 6.1.4 of the Core Strategy states that further growth at Wool will not be taken forward and supported by the Core Strategy for a number of reasons. It is ZBV's view that the proposed mixed use regeneration proposals for the DGTP site as set out in the emerging Masterplan and outline planning application successfully address each of the stated reasons for the exclusion of Wool from consideration for additional growth in paragraph 6.1.4 of the Core Strategy as set out below:

*1) Wool is not at the appropriate level in the settlement hierarchy set out in Policy LD: Location of Development*

15.2.6 As outlined in ZBV's response to Matter 2, the settlement hierarchy set out in Policy LD ignores the fact that Wool benefits from a number of sustainability criteria including a main line railway station and a strategic employment site at DGTP (50% of Purbeck's employment land / c.1,000 employees) with consent for a low carbon renewable energy facility. Indeed Wool could be considered to represent a more beneficial / sustainable location for new development comparative to many of the other settlements across the District.

15.2.7 As the Council is demonstrably failing to meet housing need in the District over the Plan period it is ZBV's view that greater emphasis should be given to Wool and the DGTP site within the settlement hierarchy set out in Policy LD: Location of Development to ensure that the Council properly considers all options for growth.

*2) The RSS omitted reference to Dorset Green Technology Park and its potential to deliver strategic economic growth for Dorset*

15.2.8 Whilst the Regional Spatial Strategy was silent on the potential for the DGTP site to contribute to economic growth in Dorset it should be remembered that the RSS was largely formulated prior to the appointment of ZBV as a development partner with the HCA. Consequently the opportunity for

regenerating the site and enhancing its strategic role within Dorset were not known at the regional level.

15.2.9 It is important to note that the SWRDA Workspace Strategy (2008) did recognise the importance of the site as a strategic employment location and identified that the site has capacity (and existing infrastructure) to accommodate significant levels of new business development. The GOSW also note in their letter to the Council dated 23/11/2009 that Purbeck's two existing commercially functioning 'strategic employment locations (at DGTP and Holton Heath/Admiralty Park)' should be seen as 'fix points' around which housing distribution "needs to be explored".

15.2.10 It is evident from Table 2 (page 26) of the Core Strategy that there is limited availability of land to accommodate employment growth within Purbeck. Consequently, it is clear that some new employment growth will need to come forward at the DGTP site in order to meet employment growth targets yet the Council have not considered any options in this regard.

15.2.11 The Council's dismissal of the site as a potential major contributor to sustainable growth within the District is therefore considered to be contrary to paragraph 19 of the NPPF which seeks to ensure that the planning system operates to encourage and not act as an impediment to sustainable growth.

*3) Recent housing growth at Purbeck Gate, Wool has not led to any increase in employment growth at DGTP despite the aspiration of the Purbeck Local Plan Final Edition 2004*

15.2.13 The Purbeck Gate development (which is still under construction) is not an appropriate example by which to gauge the potential for the regeneration of the DGTP site. The scheme is still fresh to the market with the majority of units (and later development phases) still unoccupied – and hence, it is too early to tell whether there will be any material benefit towards DGTP. The Purbeck Gate development has not been directly marketed at the DGTP

work-force and does not include any priority to direct new housing towards the local population (which would be case at the DGTP site). The DGTP proposals will also include significant improvements to the building stock/employment facilities which will be vital to improve the employment potential of the site (and its attractiveness to new firms looking to relocate to Dorset).

*4) Transport infrastructure would be unlikely to support the potential increase in vehicles and bids for regional funding for a Wool Bypass were unsuccessful*

15.2.14 The site is well located in terms of access to the strategic road-network and the London Waterloo–Weymouth main-line station at Wool and it benefits from a high level of internal road infrastructure arranged in a grid format which is an ideal and flexible arrangement to cater for future development. Furthermore, the regeneration of the site provides the opportunity to significantly improve links/connectivity (particularly via public transport) and improve the overall sustainability of the development through self-containment by locating new jobs next to new homes.

15.2.15 As part of the Masterplan proposals, a detailed Transport Assessment and Travel Plan have been formulated to assess the potential impact of a mixed-use development and to outline a series of sustainable transport initiatives to overcome any impact. This has been agreed in principle with Dorset County Council for the site and will include:

- provision of a new shuttle bus service from DGTP to Wool, East Burton and Wool Station;
- significant improvements to the frequency and routing of the existing bus network in the area;
- improved pedestrian/cycle links to Wool, Wool Station and the surrounding area;

- securing improvements to Wool Station – to include an extension to the platform and alterations to the signals (to enable the road crossing to remain open whilst trains are sitting in the station);
- to investigate the possibility of re-opening the former rail-halt on the northern boundary of the DGTP site, thereby allowing trains (on the London Waterloo to Weymouth line to stop at the site);
- to provide an electric car club (on-site) for use both by residents and employees

15.2.16 With the implementation of the above initiatives it has been agreed with Dorset County Council that the proposed redevelopment plans for the site set out in the Masterplan can be comfortably accommodated within the area’s existing transport infrastructure without the need for the Wool Bypass to be constructed. This is therefore considered to be in compliance with paragraph 32 of the NPPF.

5) *The delivery of new employment growth at DGTP is not essential to the delivery of the Purbeck vision*

15.2.16 The recently published National Planning Policy Framework (NPPF) provides for a clear presumption in favour of sustainable development. It encourages local planning authorities to proactively support sustainable economic growth and identify strategic sites for local and inward investment to match anticipated requirements over the plan period.

15.2.17 As highlighted in ZBV’s response to Matter 6 it is clear that DGTP and Holton Heath are the two largest and most important employment sites in the District in terms of the ability to deliver the required level of employment land during the plan period. It has already been noted that there are uncertainties regarding future employment growth at Holton Heath due to potential impact on the adjoining protected heathland and the lack of any proposal to mitigate this identified impact. All other identified employment sites are relatively small-scale and include only minimal additional capacity to accommodate growth.

15.2.18 Purbeck's 2009 Preferred Options Report saw the Winfrith Technology Centre (now DGTP) providing a focus for inward investment of economic growth, whilst also catering for local employment needs with 20ha identified in the plan period. It is not clear why the Council has suddenly departed from this consideration of DGTP as an important employment location in the District.

15.2.19 The DGTP site and the Masterplan enclosed in Appendix 15.1 of this response have a number of advantages which mean that the site could play a leading role in accommodating a significant proportion of the identified strategic growth within Purbeck. These advantages are summarised below:

- The DGTP site is the only employment site within Purbeck with the opportunity (and developer interest) to deliver significant new employment growth during the plan period. The Masterplan aspires to maximise the employment potential (particularly local employment opportunities) of the site by creating a 'prestige' business park focused on attracting/accommodating high tech and green businesses/industries.
- The Masterplan can provide for up to 700 dwellings, including affordable housing and low cost housing for local people. This would contribute to meeting the housing targets and the recognised shortfall of housing within the district. This scale of housing development would also enable the provision of supporting services and facilities providing a level of self-sufficiency and supporting the existing surrounding settlements of Wool, East Burton and Winfrith;
- The mixed use masterplan would provide housing next to employment offering the opportunity for residents to live, work, learn and socialise in the same geographical area. This is consistent with Paragraph 30 of the NPPF which encourages patterns of development which support reductions in greenhouse gas emissions and reduce congestion;

- The scale of the Dorset Green masterplan means that it is able to provide a c. 29 hectare SANGS proposal. This has been designed in consultation with Natural England to offset any impacts on the nearby designated sites and be a high quality, viable and a suitable alternative to recreational activities on the heathlands;
- The Dorset Green masterplan includes a Green Travel Plan, agreed in principle with Dorset County Council, which outlines how the developer intends to improve the existing public transport and infrastructure of the surrounding area (see paragraph 15.2.19 above);
- An existing planning consent for a Low Carbon Energy Facility (LowCEF) on the site will provide green electricity and energy and will enable ZBV to aim for the Dorset Green Masterplan to deliver 'zero carbon' homes through sustainable design and a connection for the new facility. Any scheme on the site would also seek to have a high Code level and BREEAM ratings;
- The scale of mixed use development which could be achieved on the site provides the option of a new school on the Site as well as higher education and training facilities as well as other community facilities.

15.2.20 On this basis and contrary to the assertion of the Council, it is firmly our view, that the emerging Masterplan proposals for the DGTP site can sustainably accommodate both new employment and housing growth without impacting negatively on protected habitats and in turn make a significant contribution towards improving Purbeck housing supply, increasing access to affordable housing, stimulating economic growth and (most importantly) delivering economic growth directly alongside new housing. This is fully in accordance with the three dimensions for achieving sustainable development set out in paragraph 7 of the NPPF.

15.2.21 As demonstrated above, in the emerging Masterplan proposal and in the comprehensive supporting evidence base, there exists a viable and realistic

opportunity around Wool through the mixed use regeneration of the DGTP site, to contribute significantly to the housing and employment needs of the District. On this basis, the importance of the DGTP site should be recognised in Policy SW by identifying it as a key site for the delivery of new growth in the South West Purbeck area and the wider District.