

Reviewing the Plan for Purbeck's future

Purbeck Local Plan Partial Review
Previously Developed Land Study, January 2015



Thriving communities in balance
with the natural environment

Executive summary

This study analyses land submitted to the Council by landowners who would like to see their land developed. It looks at the amount of previously developed land (PDL) within the submitted sites and assesses what could potentially be appropriate for strategic and non-strategic housing and employment growth in Purbeck.

This study identifies that there is an overall total of 27.854ha of potentially useful PDL available for development in Purbeck. Of this, around 7.914ha could be used for strategic housing and/or employment. Around 19.716ha could be suitable for strategic employment-only use.

The most significant areas of PDL are located at Dorset Green Technology Park (21.248ha), Admiralty Park at Holton Heath (3.773ha) and Bovington first school (1.3ha).

A number of small sites could come forward as windfall and the study considers these to represent non-strategic potential: around 0.121ha of the total could be used for housing or employment; and around 1.003ha could be suitable for employment-only use.

The study recommends the results be treated with caution because PDL is just one of many factors the Council will need to consider when allocating land for development.

Contents

Introduction	4
Policy context.....	4
Methodology	6
Discussion	17
Strategic	17
Non strategic	17
Conclusion and recommendations	19
Glossary	20

Appendices

Appendix 1: response from Planning Advisory Service	21
Appendix 2: location maps by parish.....	22

Introduction

1. Paragraph 47 of the Purbeck District Local Plan Part 1 (PLP1) inspector's report discusses previously developed land (PDL) in the district. At the time, the Council had not undertaken a thorough analysis of PDL and the inspector felt that there could be opportunities for development that could contribute to reducing the PLP1's shortfall in housing provision. Therefore, he recommended that the Council should consider the potential contribution that could be made by PDL. This background paper looks at this potential.

Policy context

2. The National Planning Policy Framework (NPPF) sets the overarching context for planning in England. In paragraphs 17 and 111, it says that using PDL (brownfield) land is a core planning principle.
3. This message is repeated in the National Planning Practice Guidance (NPPG)¹, which encourages the use of PDL, providing it is not of high environmental value.
4. Annex 2 of the NPPF defines PDL as:

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.'

5. Notably, the NPPF's definition is not clear about whether equine-related development can be included as PDL. Therefore, the Council sought advice from the Planning Advisory Service, whose full response is in appendix 1. In summary, the advice was that horses in the show jumping / stud farm sense are not considered in law as livestock and they are not used for farming land. Therefore, the use of land in this way is not agricultural and buildings occupying that land can be considered as PDL.
6. It is also worth noting that the NPPF's definition exempts private residential gardens from inclusion as PDL. But on closer inspection, this could be interpreted as only applying where these are in built-up areas. The Council believes that while this part of the definition is unclear, the spirit is to exclude residential gardens altogether. After all, it would not make sense to exempt gardens in built-up areas, yet include them if they are in the open countryside. So for the avoidance of doubt, the Council interprets the definition to not include any residential gardens in this study, regardless of where they are located.

¹ Ref ID: 10-026-20140306

7. Lastly, the NPPF's definition says that associated fixed surface infrastructure is PDL and this could be interpreted to include points of access. Points of access to sites in Purbeck, such as driveways and private roads are generally awkwardly shaped and unlikely to be built on. Furthermore, the Council would assume that points of access would be retained if a site is redeveloped anyway. As such, it would be pointless including them in the total developable PDL for a site. Therefore, the Council's approach is to include buildings and hardstandings within its calculations, but not the driveways and other points of access to them.

Methodology

8. There is no guidance available on how to undertake a PDL study. The context of paragraph 47 of the inspector's report is one of housing. As a result, this study will focus primarily on the contribution that PDL could make to housing provision. However, given the significant environmental constraints in the district, it makes sense to take this opportunity to also record the amount of PDL that could potentially be used for alternative uses.
9. The NPPF's definition could potentially cover a very large number of sites (every dwelling in every settlement, for example), but it would be meaningless to assess absolutely everything in the district because there is no certainty that it is available for development. Instead, this study looks at land submitted to the Council by landowners who wish for their land to be developed. This land is presented in the Council's Strategic Housing Land Availability Assessment² (SHLAA). In using the SHLAA, the Council can be sure that any PDL identified is available.
10. Officers looked at all the Council's SHLAA sites and assessed each one against the NPPF's definition of PDL. The analysis did not involve an in-depth study of every site, as such details would be addressed through any future planning application or allocation through a future plan(s). Instead, the desktop assessment had regard for significant constraints, namely flood zones 2 and 3 and the 400m heathland buffer. Where sites fall within the 400m zone, new housing would not be acceptable in principle. However, non-residential development might be. The study records such instances to demonstrate how much PDL could be available for non-residential development (subject, of course, to normal planning considerations).
11. The study also includes a commentary about the usefulness of any PDL identified. This is to identify which areas would form logical locations for focussing growth. For example, there are areas where the PDL is dispersed widely across a large site that is itself is in an isolated part of the district. Dispersed and/or isolated PDL would be less useful from a strategic housing allocations point of view than a concentrated area of PDL on the very edge of a settlement.
12. The results are shown in the table below, with maps of the sites in appendix 2. The table does not show every site that was ruled out. Instead, it only shows sites containing potential PDL.
13. It is important to read the results with caution. This is because the study has taken a high level overview of sites and there are many other planning considerations to take into account when assessing where to direct development. Such considerations could rule sites out and so it would be inappropriate to use this study as sole justification for allocating a site. Therefore, the presence of PDL should be just one of the many factors in the Council's decision-making processes when it considers locations for growth.

² <https://www.dorsetforyou.com/localplan/monitoring/purbeck>

Results

Parish	Site SHLAA ref & description	Officer assessment	Potential area of PDL	Suitability for housing / usefulness from a strategic housing point of view?
Arne	<p>6/02/1311. Land at engine house, Ridge.</p> <p>See appendix 2, map 1.</p>	Former engine house is PDL, but surrounding land is not.	0.003ha	<p>The site is not covered by any significant constraints and is on the edge of the settlement boundary. Under existing planning policy, there may be potential for the building to be converted to residential or other uses, subject to development management considerations.</p> <p>However, this is a very small parcel of PDL in a large site that the landowner is promoting for strategic development. The hope value would make the conversion of one small building unlikely.</p> <p>The amount of PDL is small and would not be large enough to consider for strategic growth.</p> <p>Summary: PDL too small for strategic growth and not useful for residential or other uses because of the unlikelihood of the PDL coming forward.</p> <p>Conclusion: no useful PDL.</p>

<p>Bere Regis</p>	<p>6/03/1336. Bere Regis first school buildings, which are proposed to be replaced elsewhere.</p> <p>See appendix 2, map 2.</p>	<p>School buildings and hardstanding are PDL, but the recreation space, such as the cricket wicket and playing field are not.</p>	<p>0.3ha</p>	<p>This PDL is located adjacent to the settlement boundary. Under existing planning policy, there may be potential for the buildings to be converted to residential or other uses, subject to development management considerations.</p> <p>The amount of PDL is not particularly large, but is significant given the context of the size of Bere Regis. Therefore, it could be large enough to consider for strategic growth, if required.</p> <p>Summary: PDL potentially suitable for strategic residential or employment.</p> <p>Conclusion: 0.3ha useful PDL.</p>
<p>Corfe Castle</p>	<p>6/08/0304. Estate office at Kingston.</p> <p>See appendix 2, map 3.</p>	<p>Estate office is PDL, but its curtilage and surrounding land are not.</p>	<p>0.009ha</p>	<p>The office is on the edge of the settlement boundary, but nevertheless in the open countryside. There may be potential to convert to residential or an alternative use, subject to development management considerations.</p> <p>However the amount of PDL is small and would not be large enough to consider for strategic growth.</p> <p>Summary: PDL too small for strategic growth, but potentially useful for residential or alternative conversion.</p> <p>Conclusion: 0.009ha useful PDL.</p>

Previously developed land study

	<p>DCC-owned depot proposed for employment use only.</p> <p>See appendix 2, map 4.</p>	<p>A depot off the B3351, which appears to be currently used to store gravel.</p>	<p>0.1ha</p>	<p>The site is being promoted for employment use only. It is detached from the settlement boundary but only by around 300m, so it could be suitable for an employment use, subject to development management considerations. It would be too small for a strategic allocation, though.</p> <p>Summary: PDL too small for a strategic employment allocation, but could be suitable for an employment use.</p> <p>Conclusion: 0.1ha useful employment PDL.</p>
<p>East Stoke</p>	<p>6/11/0292. Shed / garage off A352.</p> <p>See appendix 2, map 5.</p>	<p>The building falls under the PDL definition, but its curtilage does not.</p>	<p>0.003ha</p>	<p>The small site is in the open countryside and a considerable distance from other development. Furthermore, it is within the 400m zone. These factors would mean the site is unsuitable for housing. It may be suitable for alternative uses, subject to development management considerations.</p> <p>Summary: PDL too small for strategic growth and not suitable for residential conversion. Potentially useful for an employment conversion.</p> <p>Conclusion: 0.003ha useful employment PDL.</p>

<p>Lytchett Minster</p>	<p>6/15/0555. Temporary school buildings and hard standing to the north of Lytchett Minster.</p> <p>See appendix 2, map 6.</p>	<p>The whole of this site is PDL.</p>	<p>0.7ha</p>	<p>This PDL is located on the edge of Lytchett Minster in the open countryside, but relates relatively well to the existing development. It contains temporary school buildings, but permanent hardstanding. The site is part of a swathe of land currently promoted in the SHLAA and could be used as part of a strategic allocation, should the Council decide to focus growth in this area.</p> <p>Summary: could be potentially suitable for part of a strategic allocation.</p> <p>Conclusion: 0.7ha useful PDL.</p>
	<p>6/15/0532. Land adj. Park Cottages.</p> <p>See appendix 2, map 6.</p>	<p>The outbuilding is PDL, but the rest of the curtilage is not.</p>	<p>0.002ha</p>	<p>This is a very small piece of PDL, comprising a domestic outbuilding. It is located on the edge of Lytchett Minster in the open countryside, but could relate quite well to the village, if it were to come forward as part of a strategic allocation. Otherwise, it would probably be too small to convert into a residential property or alternative use.</p> <p>Summary: PDL too small to be of any use. Could be potentially suitable for part of a strategic allocation.</p> <p>Conclusion: no useful PDL.</p>

Previously developed land study

Morden	6/16/0379. Derelict former house to the north of the village hall. See appendix 2, map 7.	The former dwelling is PDL, but its curtilage and the surrounding area are not.	0.012ha	<p>The site is in open countryside, isolated and some distance from other development. Whilst the existing dwelling is PDL, it could not be intensified, although it may be suitable for alternative uses, subject to development management considerations.</p> <p>Summary: the existing lawful use is most likely residential and therefore it is superfluous to say the site would be suitable for conversion to housing, but it could be brought back into use. There could be potential for conversion to an alternative use. Not suitable for strategic growth.</p> <p>Conclusion: 0.012ha useful PDL.</p>
	6/16/0380. Former school and outbuildings now used by the Charborough Estate for storage. See appendix 2, map 7.	The school, outbuildings and hardstanding are all PDL, but the open grassed areas are not.	0.1ha	<p>The site is in open countryside and some distance from other development. Existing planning policies would allow conversion to residential or other uses, but the site is too isolated to recommend as a strategic allocation. It may also be too isolated for consideration under the Council's rural exception site policy.</p> <p>Summary: not suitable for strategic growth. Buildings could potentially be converted to housing or other uses.</p> <p>Conclusion: 0.1ha useful PDL.</p>

<p>Moreton</p>	<p>6/17/1306. Caravan site at Moreton. See appendix 2, map 8.</p>	<p>Permanent structures such as the reception, toilet and blocks, etc. are PDL.</p>	<p>0.063ha</p>	<p>The site is in open countryside, although is located opposite some other development. However, the amount of PDL is very small and dispersed around a large site currently being operated as a successful campsite. Developing the small amount of PDL would jeopardise the business and it is reasonable to argue this would be extremely unlikely.</p> <p>The landowner is currently promoting it as part of a large swathe of land in the SHLAA and it could be allocated, should the Council decide to focus growth in this area. However, it would be inappropriate to use PDL as a justification for focussing growth here because the amount of PDL involved is so small and dispersed.</p> <p>Summary: PDL too small for strategic growth and not useful for residential or other uses because of the unlikelihood of the PDL coming forward.</p> <p>Conclusion: no useful PDL.</p>
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Previously developed land study

<p>Swanage</p>	<p>6/20/0189. West of Cauldron Barn. See appendix 2, map 9.</p>	<p>The toilet block, gas storage and play equipment are all PDL.</p>	<p>0.034ha</p>	<p>The amount of PDL is very small and dispersed around a large site currently being operated as a successful campsite. Developing the small amount of PDL would jeopardise the business and it is reasonable to argue this would be extremely unlikely.</p> <p>The landowner is currently promoting it for strategic growth in the SHLAA and it could be allocated, should the Council decide to focus growth in this area. However, it would be inappropriate to use PDL as a justification for focussing growth here because the amount of PDL involved is so small and dispersed.</p> <p>Summary: PDL too small for strategic growth and not useful for residential or other uses because of the unlikelihood of the PDL coming forward.</p> <p>Conclusion: no useful PDL.</p>
	<p>6/20/1332. Cauldron Barn caravan site. See appendix 2, map 9.</p>	<p>The permanent buildings and hardstanding are PDL, but the open land and anywhere without a permanent structure are not.</p>	<p>0.3ha</p>	<p>The site is in the countryside, although it is located towards the edge of the settlement and relates well to it. Planning policies would allow conversion of the PDL to residential or other uses. However, the PDL forms part of a larger site currently being operated as a successful caravan site. Developing the PDL would jeopardise the business and it is reasonable to argue this would be extremely unlikely. Notwithstanding this, given its good relationship with the settlement, the PDL could lend itself to forming part of a strategic allocation, should the Council decide to focus growth in this location.</p> <p>Summary: PDL potentially useful for residential or other uses, but only if it were to come forward as part of a strategic allocation. Without an allocation, it would not be useful because it is unlikely it would come forward.</p> <p>Conclusion: no useful PDL.</p>

	<p>6/30/1327. Houses and outdoor education centre buildings at Townsend.</p> <p>See appendix 2, map 10.</p>	<p>All these buildings, but not their curtilages, are PDL.</p>	<p>0.309ha</p>	<p>The site is in the countryside, but relates well to existing development in Swanage.</p> <p>The existing dwellings could not be intensified. In theory, there could be potential for them to convert to an alternative use, but that is highly unlikely, given the high residential values in the area. The other buildings at the site may have potential to convert to residential or alternative use, subject to development management considerations.</p> <p>The site is relatively large and therefore could potentially be considered big enough to form part of a strategic allocation, should the Council decide to focus growth in this location.</p> <p>Summary: there may be potential for strategic growth. Otherwise, without a strategic allocation, the only useful PDL would be the existing non-residential buildings, which could potentially convert to residential or alternative uses.</p> <p>Conclusion: 0.309ha useful PDL.</p>
<p>Wareham St Martin</p>	<p>Admiralty Park at Holton Heath industrial estate, proposed for employment use only.</p> <p>See appendix 2, map 11.</p>	<p>Various industrial buildings. The buildings are PDL, but the surrounding greenery is not.</p>	<p>3.773ha</p>	<p>There is a significant amount of PDL here being promoted for employment-only development. It is a key employment site in the district and therefore, it is safe to conclude that it is suitable for employment development, subject to development management considerations.</p> <p>Summary: PDL suitable for strategic employment development.</p> <p>Conclusion: 3.773ha useful employment PDL.</p>

Previously developed land study

<p>Winfrith /Wool</p>	<p>6/26/0303 & 6/26/0435. Dorset Green Technology Park.</p> <p>See appendix 2, map 12.</p>	<p>The buildings and other infrastructure are PDL, but the green space around them is not.</p>	<p>21.248ha, of which 6.605ha would be suitable for housing.</p>	<p>This is a significant amount of PDL forming part of a large-scale SHLAA promotion. Of the total, 14.643ha are within 400m of the heath, meaning 6.605ha are not constrained by the heath. Those areas in the 400m zone could lend themselves towards other uses.</p> <p>The site is relatively isolated from other development and, if the Council is minded to locate growth here, it would need to take into account the risk of creating an isolated community.</p> <p>Furthermore, it is also worth bearing in mind that the site is a key employment site in the district and so the loss of any buildings in employment use would have to be well justified.</p> <p>Summary: potentially suitable for strategic growth. All buildings are potentially suitable for residential or alternative uses, except those within the 400m zone, which would only suitable for non-residential uses.</p> <p>Conclusion: 21.248ha useful PDL, of which 14.643ha would only be suitable for non-housing use.</p>
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Wool	DCC-owned Bovington middle school proposed for employment use only. See appendix 2, map 13.	School buildings and hardstanding are PDL, but the recreation space, such as the tennis courts and playing field are not.	1.3ha	<p>This is a relatively large area of PDL being promoted for employment-only uses. Given its location on the edge of the settlement, it could be suitable, subject to development management considerations.</p> <p>Given its size, it may be large enough to be considered for a strategic allocation, should the Council be minded to locate employment development here. Notwithstanding this, national and local planning policy would support in principle the conversion of the building to employment anyway.</p> <p>Summary: potentially suitable for conversion to an employment use, or as a strategic employment allocation.</p> <p>Conclusion: 1.3ha useful employment PDL.</p>
Total useful PDL identified				27.854ha
Of which total potentially useful for strategic housing and/or employment				7.914ha
Of which total potentially useful for strategic employment only				19.716ha
Of which total potentially useful for non-strategic housing and/or employment				0.121ha
Of which total potentially useful for non-strategic employment only				1.003ha

Discussion

14. The main purpose of this study is to identify PDL to accommodate strategic housing allocations. The results show that there is an overall total of 27.854ha of useful PDL available for development in Purbeck. To determine if the potential PDL could be useful, officers have judged each site on its merits, balancing factors such as likelihood of sites coming forward; and the dispersed and/or isolated nature of the PDL (making it unsuitable for strategic allocations).
15. The results can be broken down to potentially useful for strategic and non-strategic growth:

Strategic

16. Of the total, around 7.914ha could be used for strategic housing and/or employment. Given that landowners are promoting their land for housing through the SHLAA, it is probably safe to conclude that it is more likely this would come forward for housing because it is worth more. This land comprises Bere Regis first school³ (0.3ha); Lytchett Minster school buildings⁴ (0.7ha); Townsend in Swanage⁵ (0.309ha of PDL); and the part of Dorset Green Technology Park⁶ that sits outside the 400m heathland buffer (6.605ha).
17. Some of the potentially useful PDL is either constrained and unsuitable for housing, or has been submitted to the Council for employment-only use. In terms of potential for strategic employment-only allocations, there are 5.073ha available. These are located at Admiralty Park in Holton Heath⁷ (3.773ha); Bovington first school⁸ (1.3ha); and the part of Dorset Green Technology Park that sits within the 400m buffer⁶ (14.643ha).

Non strategic

18. Some of the potentially useful PDL is too small to be considered useful in the strategic sense. But it is reasonable to expect that they could come forward as windfall development, given that the landowners have expressed a desire to develop. Of the total amount of useful PDL, around 0.121ha could be used for non-strategic housing or employment. As the landowners are promoting their land for housing through the SHLAA, it is probably safe to conclude that it is more likely this would come forward for housing because it is worth more. This land comprises Kingston estate office⁹ (0.009ha); derelict house at Morden¹⁰ (0.012ha); and the former school at Morden¹⁰ (0.1ha).
19. Some of the potentially useful non-strategic PDL is either constrained and unsuitable for housing, or has been submitted to the Council for employment-only use. This totals

³ See appendix 2, map 2

⁴ See appendix 2, map 6

⁵ See appendix 2, map 10

⁶ See appendix 2, map 12

⁷ See appendix 2, map 11

⁸ See appendix 2, map 13

⁹ See appendix 2, map 3

¹⁰ See appendix 2, map 7

1.003ha and this is located at the Corfe Castle depot¹¹ (0.1ha); and the garage/shed at East Stoke¹² (0.003ha).

20. It is important to bear in mind that this study is only part of the picture in allocating land for development. Just because it says land has potential for inclusion in a strategic allocation does not mean that it will or should be allocated. There are many other factors to consider, such as compliance with the Habitats Regulations and landscape / townscape implications. Closer analysis of sites could uncover insurmountable constraints, such as contaminated land, instability or heritage issues, which do not fall under the remit of this study. Furthermore, the PPG says that development should be directed towards PDL, where it is not of high environmental value. This study has not undertaken such an assessment of environmental value, as this should be undertaken separately.
21. Consequently, the results should be treated with caution and should not be interpreted as the Council's preferred strategy for meeting housing needs.

¹¹ See appendix 2, map 4

¹² See appendix 2, map 5

Conclusion and recommendations

22. The Council produced this study further to a suggestion by the PLP1 inspector. The purpose was to allow the Council to consider the potential contribution that could be made by PDL towards reducing the shortfall in housing provision.
23. This study identifies that there is an overall total of 27.854ha of potentially useful PDL available for development in Purbeck. Of this, around 7.914ha could be used for strategic housing and/or employment, although housing would be the more likely of the two. Around 5.073ha could be suitable for strategic employment-only use because of absolute constraints that would preclude housing development, or because the landowner is promoting it for employment only.
24. Around 0.121ha of the total could be used for non-strategic housing or employment, although housing would be the more likely of the two. Around 1.003ha could be suitable for non-strategic employment-only use because of absolute constraints that would preclude housing development, or because the landowner is promoting it for employment only. Non-strategic development would likely come forward as windfall.
25. The results should be read with caution because the study has taken a high level overview of sites and there are many other planning considerations to take into account when assessing where to direct development. Such considerations could rule sites out and so it would be inappropriate to use this study as sole justification for allocating a site.
26. Therefore, the recommendation of this study is that PDL should be just one of the many factors in the Council's decision-making processes when it considers locations for growth.

Glossary

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

PDL – previously developed land

PLP1 – Purbeck District Local Plan Part 1

SHLAA – Strategic Housing Land Availability Assessment

Appendix 1: response from Planning Advisory Service

The Council asked the following question:

‘The NPPF’s definition of previously developed land excludes land that is or has been occupied by agricultural buildings. Does this apply to buildings associated with equine activity? Any comments/experience please.’

Verbatim, the response was as follows:

‘Section 336 of the Town and Country Planning Act 1990 defines agriculture as “horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes, and ‘agricultural’ shall be construed accordingly.”

The grazing of horses on agricultural land does not constitute a material change from a former agricultural use, however anything beyond the grazing of horses would require planning permission. .

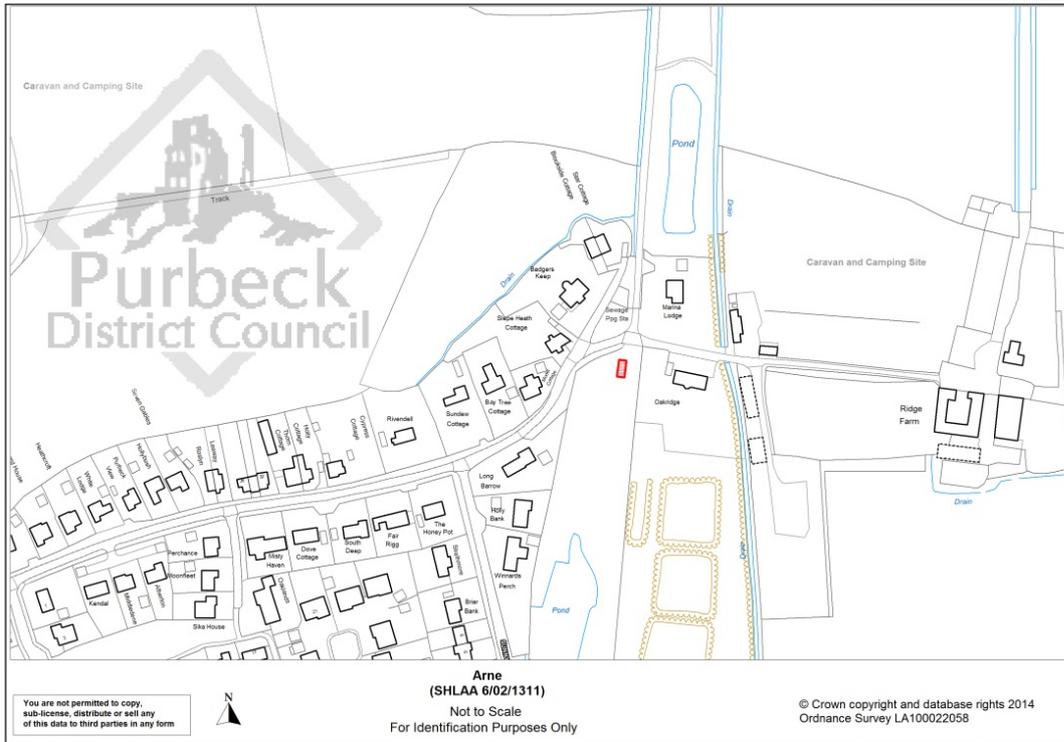
Land can be said to be used for grazing if horses are turned onto it with the purpose of feeding them from it, but not if they are kept on it for some other purpose (such as exercise or recreation or breeding) when grazing is seen as completely incidental and inevitable and where any feeding takes place other than from the grazing land, i.e. an alternative food source brought onto the site/land from elsewhere.

So unless its purely for grazing its previously developed land and subject to para 89 of the Framework etc’

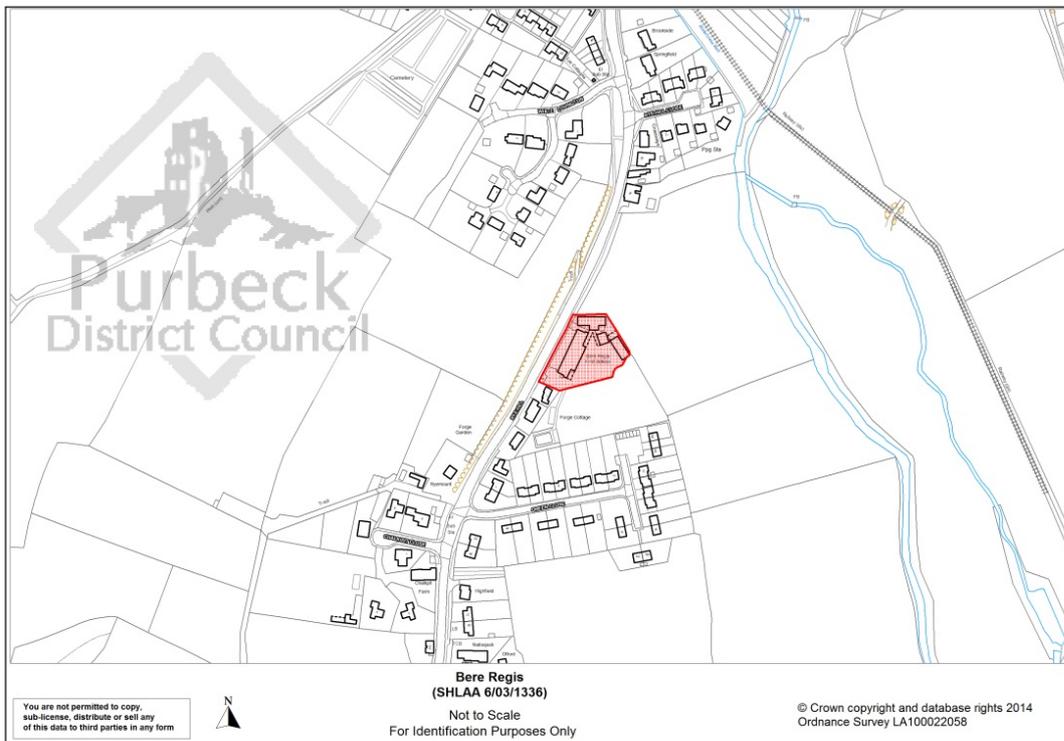
Appendix 2: location maps by parish

Map 1: Arne

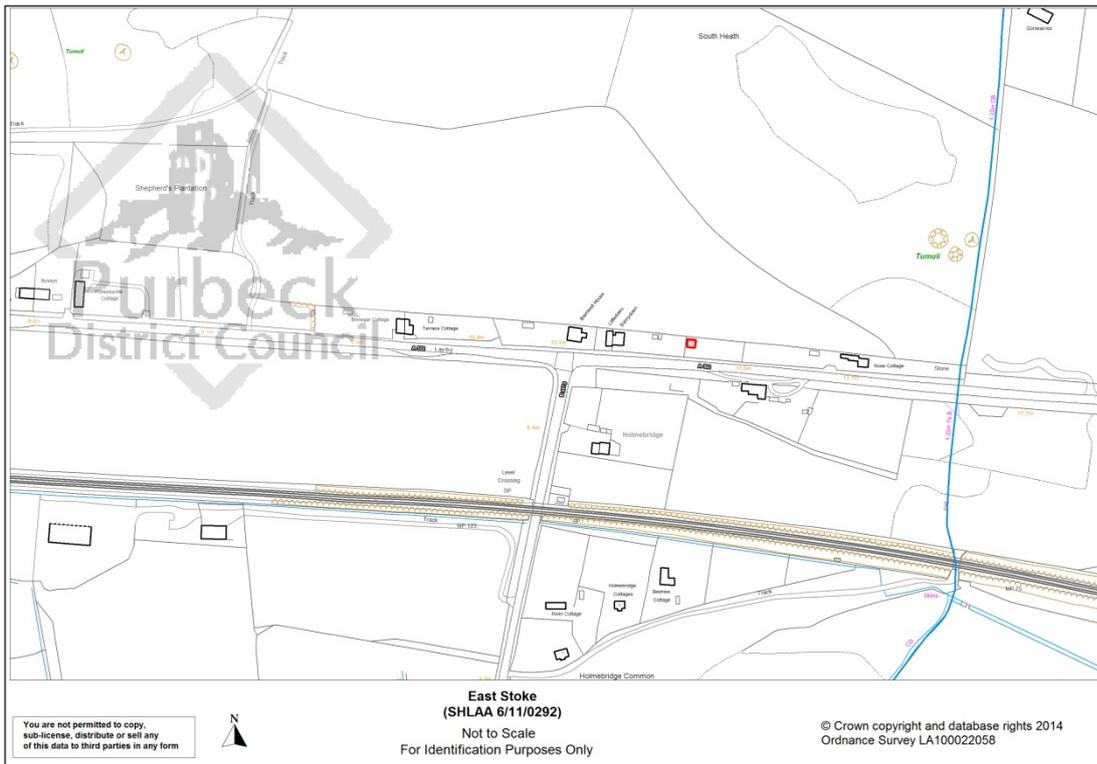
Key
PDL 



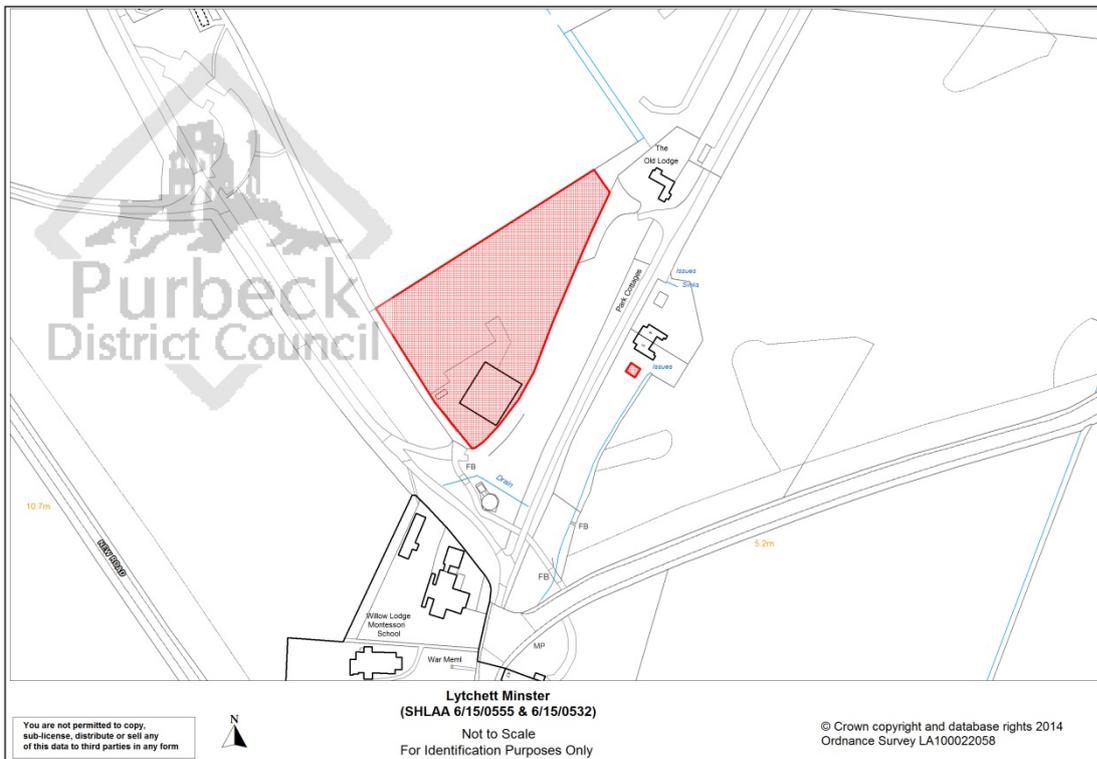
Map 2: Bere Regis



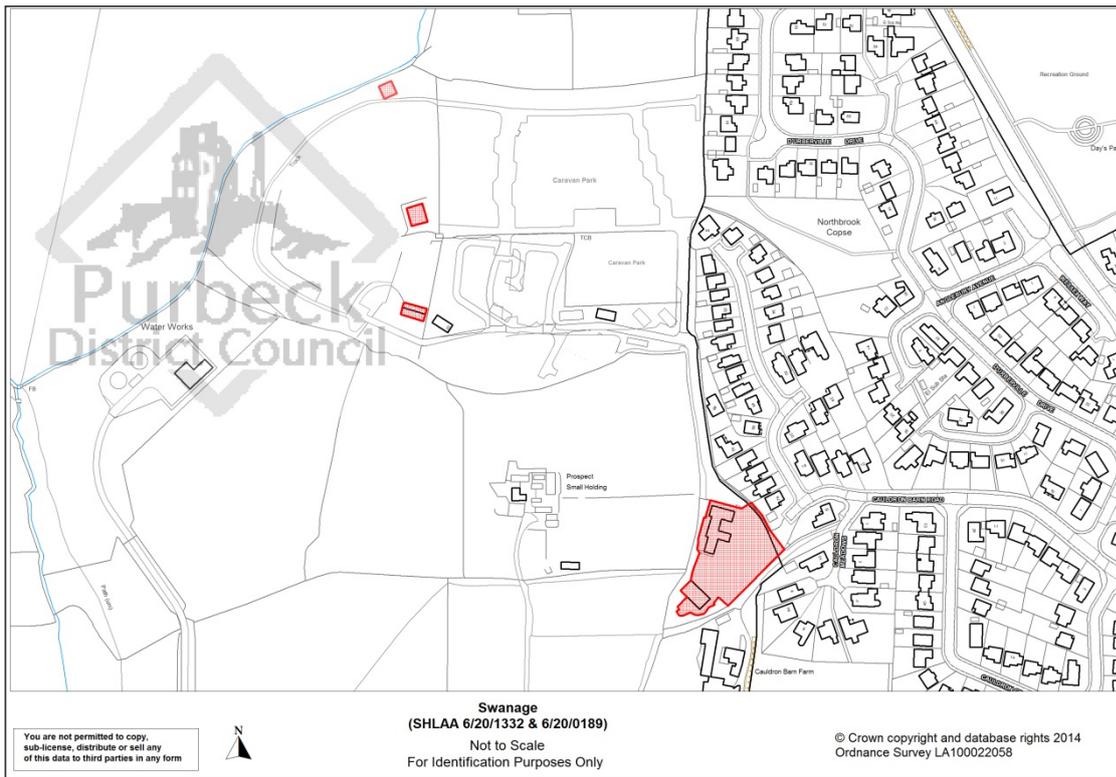
Map 5: East Stoke



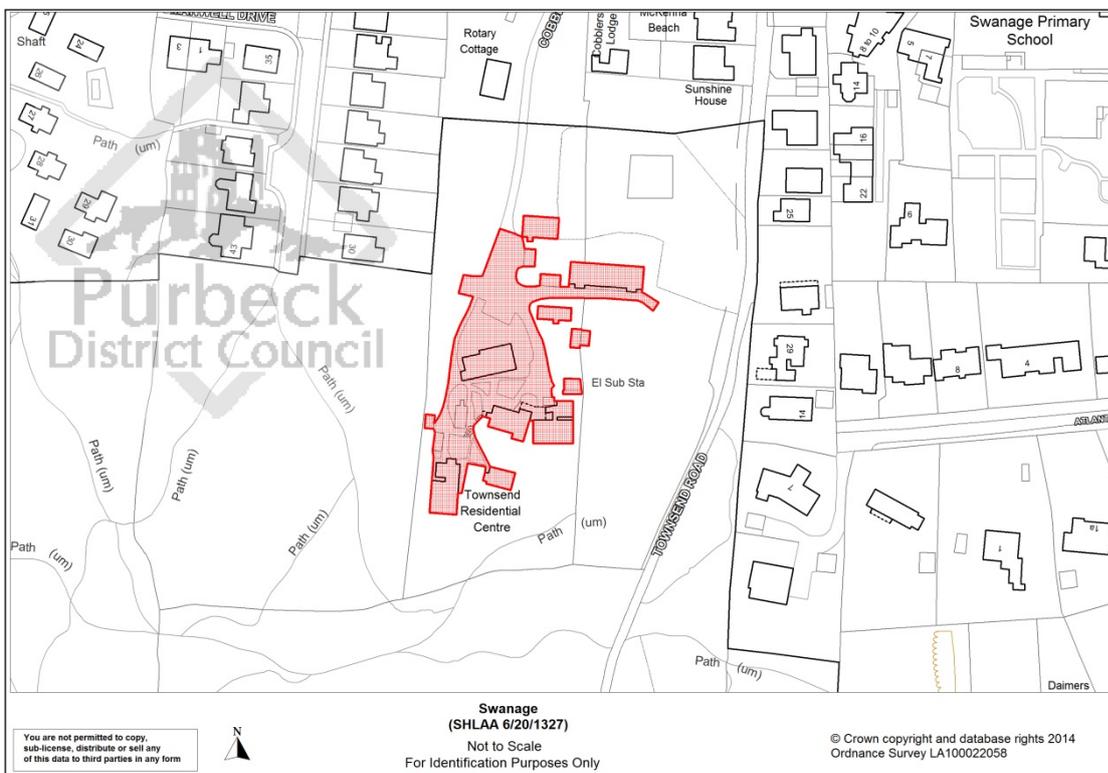
Map 6: Lytchett Minster



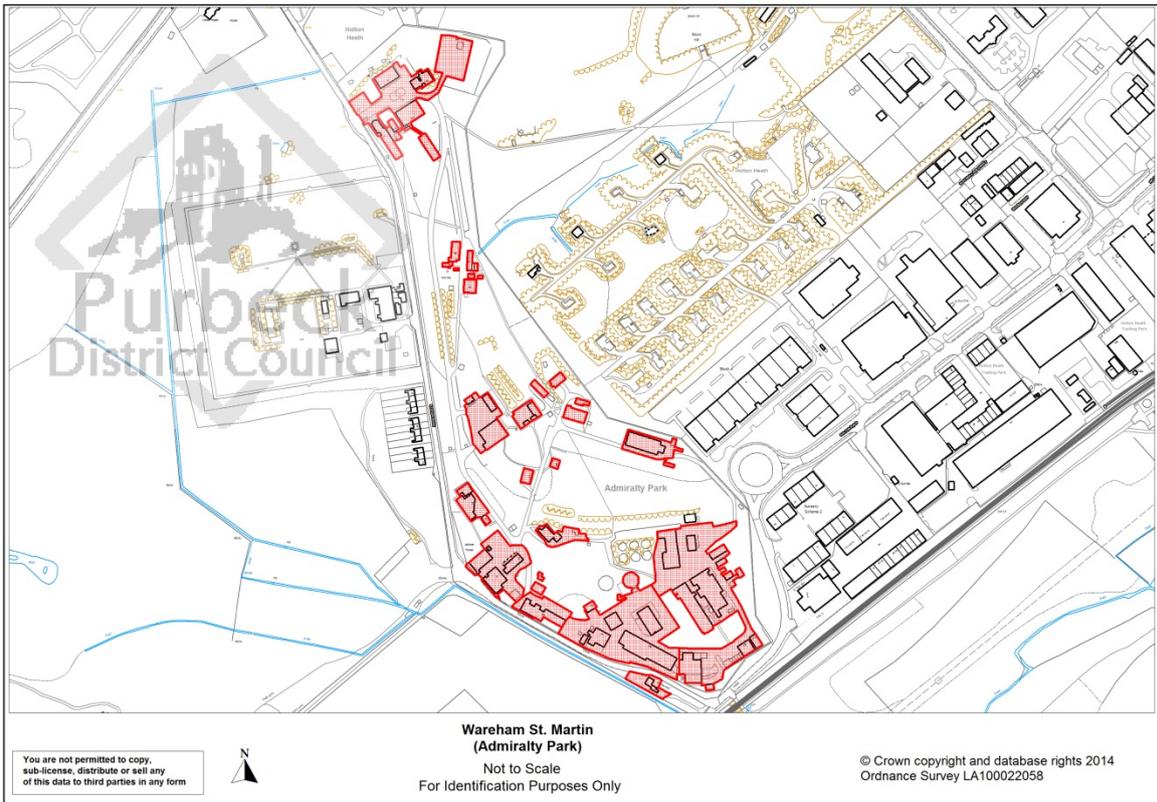
Map 9: North Swanage



Map 10: South Swanage



Map 11: Wareham St Martin (Admiralty Park)



Map 12: Winfrith Newburgh/Wool (Dorset Green Technology Park)

