



Purbeck District Council
Purbeck Local Plan
'Planning Purbeck's Future'
Main Modifications to the Core Strategy
Representation Form (June/July 2012)

Your Details

Agent's Details (*where relevant*)

| | | |
|---|------------------------|--|
| Title | | Mr |
| Name | | Cliff Lane |
| Job Title (<i>where relevant</i>) | | Director |
| Organisation (<i>where relevant</i>) | Scott Estate (Swanage) | Savills |
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Responses should be sent to:

Email: **ldf@purbeck-dc.gov.uk**

or

Post: Planning Policy, FREEPOST RSAX-LTRK-TRKE, Purbeck District Council,
Westport House, Worgret Road, Wareham, Dorset, BH20 4PP

Fax: 01929 557348

Representations will only be accepted that refer to a change shown in the Schedule of Main Modifications, or to the Habitats Regulations Assessment Update or Addendum to Sustainability Appraisal.

Return to Purbeck District Council by Tuesday 31st July 2012

Late or anonymous representations will not be accepted. All representations received will be published on the Council's website, along with your name.

An example of a completed form is available on the Council's website.

Alternatively, if you would like help completing this form please contact the Planning Policy Team.

For further information, visit **http://www.dorsetforyou.com/purbeck_consultation**, email **ldf@purbeck-dc.gov.uk** or call 01929 557359 to speak to a member of the Planning Policy Team.

You should comment only on the Main Modifications, the Habitats Regulations Assessment Statement and/or the Addendum to the Sustainability Appraisal.

Responses on the above documents will be sent to the Planning Inspector. **Therefore, you do not need to repeat your previous comments or re-submit your previous representations.**

The Inspector will decide if further public hearing sessions are required as part of the examination process. All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments on the Main Modifications. Do you consider it necessary to participate at the oral part of the examination?

| | |
|---|--|
| <input type="checkbox"/> No , I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> Yes , I wish to participate at the oral examination |
|---|--|

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary in the space below:

Savills have for some time been highlighting the need to address the long term development of the Swanage area as an essential component of sustainable and deliverable plan for Purbeck. We consider that the Main Modofications to the Core Strategy fail to address the deficiencies in the plan that have been highlighted though the examination.

Please note that the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature 

Date 27 July 2012

Representations:

You are asked to comment on the Main Modifications to the Core Strategy, the Habitats Regulations Assessment Statement and/or the Addendum to the Sustainability Appraisal:

Part A: Legal Compliance – Has the **process** of preparing this Core Strategy been followed in accordance with national guidance?

Part B: Soundness – Is the **content** of the Core Strategy sound, in other words, is it 'justified', 'effective' and 'consistent with national policy'?

Please use the forms overleaf to submit your response.

FORM A: Your Comments on Legal Compliance

Are the Main Modifications to the Core Strategy legally compliant?

*(In other words, has the **process** of preparing this version of the Core Strategy been followed in accordance with national guidance?)*

Yes

No

No Comment

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1):

| |
|-----|
| MM2 |
|-----|

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be ‘Sound’?

(In other words is the Main Modification ‘justified’, ‘effective’ and ‘consistent with national policy’)

Yes

No

No Comment

If you have chosen ‘No’, do you consider this change to the Core Strategy be unsound because:

(tick all that apply)

It is not ‘justified’
(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn’t provide the most appropriate strategy)

It is not ‘effective’
(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not ‘consistent with national policy’

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Paragraph 1.2.1

Paragraph 1.2.1 is considered unsound as it is not justified. The constraints within Purbeck are not exceptional; they are common to many local authorities in the sub-region, and; the statement that *The only designation missing is National Park status* is unclear as it gives the impression that National Park designation has somehow been overlooked for Purbeck.

The characteristics of Purbeck and the challenges facing the District are already set out in Chapter 2. Paragraphs 1.2.1 and 1.2.2 are not justified or effective in setting the context for the future partial review. The need for the review is a consequence of the decisions taken during the plan-making process, rather than a reflection of the nature of the District itself or the failure to progress the previous Local Plan to adoption. Paragraphs 1.2.1 and 1.2.2 should therefore be deleted from this section.

The second sentence of Paragraph 1.2.3 states that *Across the Poole and Bournemouth*

housing market area sufficient housing and employment is planned to meet forecasted requirements. This statement is unsound as it cannot be substantiated or justified. The NPPF (paragraph 47) indicates that local plan housing requirements should meet the full, objectively assessed needs for market and affordable housing in the housing market area. The housing need assessment included in the SHMA (figure 6.12) estimates a total annual household need across the HMA of 8,752; this level of need will not be met by current or emerging plans in the HMA, making any suggestion that sufficient housing is planned across the HMA to meet forecast requirements factually incorrect and misleading.

There is no formal agreement between the authorities across the Bournemouth and Poole Housing Market Area to ensure that sufficient growth will be planned for. Up to date development plan coverage across the housing market area is at best limited; the only local planning authority within the HMA that has an up to date plan adopted plan is Poole. Bournemouth's Core Strategy has reached the examination stage, but housing and employment provision falls short of the requirements set out in the Secretary of State's Proposed Changes to the South West Regional Spatial Strategy. The remaining local authorities in the housing market area (East Dorset, Christchurch, and North Dorset) remain reliant on the saved policies of old, outdated Local Plans, and although they are in the process of preparing new plans it is unclear at this stage to what extent they will be able to meet their own let alone neighbouring authorities housing needs.

The third sentence of paragraph 1.2.3 states that *In preparing this Local Plan, the Council was unable to provide certainty that strategic housing development over 2,520 dwellings could be successfully mitigated and not have an adverse effect upon the integrity of European protected nature conservation sites.* This statement is not justified; there are opportunities to accommodate additional housing development at Swanage, (including Scott Estate landholdings at Washponds Lane and Prospect Farm) in line with the Habitats Directive.

The fifth sentence of paragraph 1.2.3 states that *The 2012 Strategic Housing Market Assessment for the Bournemouth and Poole Housing Market Area recommends a housing target of 170 dwellings per year in Purbeck District, although it recognises that this target has yet to be tested against the Habitats Regulations.* This statement is not justified; the SHMA does not recommend a housing target. The SHMA provides a projection of household change for the period 2011-2031 of 170 dwellings per annum, and a forecast housing need for Purbeck of 520 dwellings per annum. In translating this into a housing target, vacancy rates and second homes need to be factored in (circa 8-10% for Purbeck) and wider objectives relating to economic growth and affordable housing need to be taken into consideration.

The sixth and seventh sentences of paragraph 1.2.3 state that *Therefore, following adoption of the Local Plan, the Council will undertake a partial review to further investigate ways of meeting housing needs. The partial review will plan for growth in the medium to longer term and will be started by the end of 2015.* We do not consider that this demonstrates the necessary commitment to positively addressing housing needs that it required by the NPPF. It is clear from the evidence available that Purbeck is facing a significant shortfall in housing provision that is not being met in the wider housing market area, the backlog of housing under-provision will continue to grow and affordability issues worsen until a revised plan is brought into force to address the issue, or unless a settlement extension to Swanage is brought forward into the five year land supply with an accompanying strategic allocation.

We are concerned that the plan is fundamentally unsound due to the under-provision of housing and our representations have highlighted the opportunity for a strategic allocation at Washponds Lane, Swanage as a means of addressing this concern. Evidence in support of a strategic allocation at Washponds Lane was considered through the Examination, there are no overriding constraints to development and the proposals would deliver significant community benefits. It is

therefore considered unnecessary to further delay decisions on the location of additional housing growth at Swanage as this would prejudice the opportunity for sustainable development at Washponds Lane to come forward in line with the development plan. We therefore remain of the view, as expressed at the examination and in our related submissions, that without a reference to a strategic allocation at Washponds Lane, Swanage, the plan remains unsound.

In the absence of any changes to the plan that identify new locations for growth, it is essential that any review of the plan is progressed in a timely and focused manner. This should focus on the opportunities for growth highlighted through the Examination process.

The last part of paragraph 1.2.3 sets out a bullet point list of issues to be considered through the review. The first bullet point again refers to a district housing target of 170 dwellings per year for the later part of the plan period. This is considered unsound; the review should seek to address the backlog arising from the current and ongoing under provision that will result should the plan be adopted in its current form.

The second bullet should be broadened to take account of the wider housing market area and beyond, including the sub-region and relationships with adjoining sub-regions.

The third bullet point relating to the role of Purbeck in facilitating strategic growth at Crossways as proposed in the West Dorset, Weymouth and Portland Local Plan is considered unnecessary for the scope of the review; this can be addressed within the current framework of the plan. By the time the review takes place, West Dorset will have adopted their local plan and any strategic allocation at Crossways will be well on the way to delivery.

The fourth bullet point refers to additional settlement extensions to help meet Purbeck housing needs. This is considered an essential component of any review.

The fifth bullet point refers to '*a longer term strategic view to Green Belt including the potential to identify land for future growth*'. It is unclear what is meant by this. Any requirement for the review to include a review of Green Belt boundaries should be clearly stated, and should include a review of the opportunities for settlements beyond the outer edge of the Green Belt to accommodate growth sustainably.

The sixth and seventh bullet points are not considered necessary for the review, which should be specifically focused on housing provision.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

Delete paragraphs 1.2.1 and 1.2.2.

Amend paragraph 1.2.3 as follows:

The Local Plan makes provision for 2,520 dwellings for the period 2006-2027. ~~Across the Poole and Bournemouth housing market area sufficient housing and employment is planned to meet forecasted requirements. In preparing this Local Plan, the Council was unable to provide certainty that strategic housing development over 2,520 dwellings could be successfully mitigated and not have an adverse effect upon the integrity of European protected nature~~

~~conservation sites. However, a considerable affordable housing need will not be resolved. This is insufficient to meet identified housing needs. The 2012 Strategic Housing Market Assessment for the Bournemouth and Poole Housing Market Area recommends a housing target of projects growth of 170 dwellings-households per year in Purbeck District and a forecast housing need of 520 dwellings per annum, although it recognises that this target has yet to be tested against the Habitats Regulations. Therefore, following adoption of the Local Plan, the Council will undertake a partial review to further investigate ways of meeting ensure that housing needs are met. The partial review will plan for growth in the medium to longer term and will be started by the end of 2015 commence immediately and. The partial review will need to consider the following:~~

- ~~• A district housing target of at least 170 dwellings per year for the later part of the plan period, to take into account identified housing needs and any deficit in housing provision in the intervening period before the revised plan is adopted, with associated mitigation measures, tested against the Habitats Regulations and transport constraints;~~
- ~~• The contribution Purbeck makes to meeting the housing and employment needs of the South East Dorset conurbation, the wider housing market area and wider sub-region;~~
- ~~• The role of Purbeck in facilitating strategic growth at Crossways as proposed in the West Dorset, Weymouth and Portland Local Plan;~~
- ~~• Additional settlement extensions to help satisfy Purbeck's housing needs, including a strategic allocation at Washponds Lane, Swanage.~~
- ~~• A longer term strategic review to of the Green Belt including the potential to identify land within and beyond current Green Belt boundaries for future growth;~~
- ~~• Identifying opportunities to work with large landowners to ensure that the cumulative impact of new housing in the countryside provides opportunities to improve the sustainability of rural settlements, enhance landscape character and biodiversity and provide mitigation measures for European protected sites;~~
- ~~• The enhancement of biodiversity and habitats.~~

Note: Please use a separate sheet when responding to more than one Main Modification. Additional sheets can be photocopied and attached to this form or downloaded from www.dorsetforyou.com/purbeck_consultation

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1):

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|-----|
| MM3 |
|-----|

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be ‘Sound’?

(In other words is the proposed change ‘justified’, ‘effective’ and ‘consistent with national policy’)

Yes

No

No Comment

If you have chosen ‘No’, do you consider this change to the Core Strategy be unsound because:

(tick all that apply)

It is not ‘justified’
(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn’t provide the most appropriate strategy)

It is not ‘effective’
(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not ‘consistent with national policy’

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Paragraph 1.5.2 states that *Poole, Bournemouth and Christchurch have in their adopted or nearly adopted Core Strategies, made sufficient provision for housing and employment growth to meet their own needs. Therefore, there is no requirement for the Council to help meet these needs in Purbeck before 2027.*

This proposed change is considered unsound as it is not justified and does not reflect full extent of the duty to co-operate. There is no formal agreement between the authorities across the housing market area to ensure that sufficient growth will be planned for. Up to date development plan coverage across the housing market area is at best limited; the only local planning authority within the HMA that has an up to date plan adopted plan is Poole. Bournemouth’s Core Strategy has reached examination but housing and employment provision falls short of the requirements set out in the Secretary of State’s Proposed Changes to the South West Regional Spatial Strategy. The remaining local authorities in the housing market

area (East Dorset, Christchurch, and North Dorset) remain reliant on the saved policies of old, outdated Local Plans, and although they are in the process of preparing new plans it is unclear at this stage to what extent they will be able to meet their own and neighbouring authorities housing needs. The SHMA (Figure 6.16) estimates the total (net) annual need across the HMA of 8,350; it is clear that this need will not be met by current and emerging plans.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

Delete paragraph 1.5.2

Note: Please use a separate sheet when responding to more than one Main Modification. Additional sheets can be photocopied and attached to this form or downloaded from www.dorsetforyou.com/purbeck_consultation

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications to the Core Strategy in the box below (e.g. MM1):

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|-----|
| MM8 |
|-----|

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be 'Sound'?

(In other words is the proposed change 'justified', 'effective' and 'consistent with national policy')

Yes

No

No Comment

If you have chosen 'No', do you consider this Main Modification to the Core Strategy be unsound because:

(tick all that apply)

It is not 'justified'
(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)

It is not 'effective'
(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Paragraph 6.1.5 is not considered sound as it does not recognise the clear gap in housing provision against identified need, and fails to set out clear and specific measures to address this in reasonable timescale. It is clear from the evidence available that Purbeck is facing a significant shortfall in housing provision that is not being met in the wider housing market area, the backlog of housing under-provision will continue to grow and affordability issues worsen until a revised plan is brought into force to address the issue, or unless a settlement extension to Swanage is brought forward into the five year land supply with an accompanying strategic allocation.

We are concerned that the plan is fundamentally unsound due to the under-provision of housing and our representations have highlighted the opportunity for a strategic allocation at Washponds Lane, Swanage as a means of addressing this concern. Evidence in support of a strategic allocation at Washponds Lane was considered through the Examination, there are no overriding constraints to development and the proposals would deliver significant community

benefits. It is therefore considered unnecessary to further delay decisions on the location of additional housing growth at Swanage as this would prejudice the opportunity for sustainable development at Washponds Land to come forward in line with the development plan. We therefore remain of the view, as expressed at the examination and in our related submissions, that without a reference to a strategic allocation at Washponds Lane, Swanage, the plan remains unsound.

In the absence of any changes to the plan that identify new locations for growth, it is essential that any review of the plan is progressed in a timely and focused manner. This should focus on the opportunities for growth highlighted though the Examination process.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

6.1.5 In view of the ~~potential identified~~ shortfall in housing supply over the plan period, it is intended that, in addition to annual monitoring, a cycle of more comprehensive monitoring and review of the Purbeck Local Plan housing provision is established with and immediate review dates of 2016 and subsequent review in 2021. Review processes would start in advance of the review dates to enable any new policies to be adopted in a timely manner. The Council's partial review of the Purbeck Local Plan is scheduled to commence ~~at the latest by the end of 2015~~ immediately. All available evidence sources, including demographic forecasts and actual provision in the intervening years, as well as the outcome of any strategic assessment of development requirements agreed under the duty to cooperate, will be examined. ~~If the evidence suggests that additional housing is required the review will consider the appropriate response, bearing in mind the potential adverse effect upon European protected sites.~~ Measures to accommodate additional housing will be identified, including a strategic allocation at Washponds Lane, Swanage.

Note: Please use a separate sheet when responding to more than one Main Modification. Additional sheets can be photocopied and attached to this form or downloaded from www.dorsetforyou.com/purbeck_consultation

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications to the Core Strategy in the box below (e.g. MM1):

MM34

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be ‘Sound’?

(In other words is the proposed change ‘justified’, ‘effective’ and ‘consistent with national policy’)

Yes

No

No Comment

If you have chosen ‘No’, do you consider this Main Modification to the Core Strategy be unsound because:

(tick all that apply)

It is not ‘justified’
(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn’t provide the most appropriate strategy)

It is not ‘effective’
(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not ‘consistent with national policy’

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

The proposed change has been introduced to meet the requirements the NPPF for policies to be flexible, however the NPPF (paragraphs 14 and 47) also requires local planning authorities to positively seek opportunities to meet the development needs of their area, and to meet objectively assessed housing needs.

It is clear from the evidence available that Purbeck is facing a significant shortfall in housing provision that is not being met in the wider housing market area. Whilst we remain concerned about overall soundness of the plan due to the under-provision of housing and lack of a strategic allocation at Washponds Lane, further flexibility could be incorporated into the plan by referring to the requirement for settlement extensions to Swanage to accommodate **at least** 200 dwellings.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

.....of which ~~around~~ at least 200 dwellings, including land at Washponds Lane, Swanage.

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1):

MM35

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be ‘Sound’?

(In other words is the proposed change ‘justified’, ‘effective’ and ‘consistent with national policy’)

Yes

No

No Comment

If you have chosen ‘No’, do you consider this change to the Core Strategy be unsound because:

(tick all that apply)

It is not ‘justified’

(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn’t provide the most appropriate strategy)

It is not ‘effective’

(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not ‘consistent with national policy’

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

In line with our previous statements and representations on this matter, the proposed settlement extension to Swanage and accompanying SANGS are considered a strategic issue that should be addressed in the Core Strategy rather than the subsequent Swanage Local Plan.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

Include a reference to the potential for a strategic SANGS to be delivered along site the proposed development at Washpond Lane.

Note: Please use a separate sheet when responding to more than one Main Modification. Additional sheets can be photocopied and attached to this form or downloaded from www.dorsetforyou.com/purbeck_consultation

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications to the Core Strategy in the box below (e.g. MM1):

MM37

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be ‘Sound’?

(In other words is the proposed change ‘justified’, ‘effective’ and ‘consistent with national policy’)

Yes

No

No Comment

If you have chosen ‘No’, do you consider this Main Modification to the Core Strategy be unsound because:

(tick all that apply)

It is not ‘justified’
(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn’t provide the most appropriate strategy)

It is not ‘effective’
(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not ‘consistent with national policy’

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

The proposed change has been introduced to meet the requirements of paragraph 23 of the NPPF for policies to be flexible, however the NPPF (paragraphs 14 and 47) also requires local planning authorities to positively seek opportunities to meet the development needs of their area, and to meet objectively assessed housing needs.

It is clear from the evidence available that Purbeck is facing a significant shortfall in housing provision that is not being met in the wider housing market area. Whilst we remain concerned about overall soundness of the plan due to the under-provision of housing and lack of a strategic allocation at Washponds Lane, further flexibility could be incorporated into the plan by referring to the requirement for settlement extensions to Swanage to accommodate **at least** 200 dwellings.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

The allocation in the Swanage Local Plan of as settlement extension(s) of ~~approximately~~ at least 200 dwellings, including land at Washponds Lane, Swanage.

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications to the Core Strategy in the box below (e.g. MM1):

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|------|
| MM38 |
|------|

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be 'Sound'?

(In other words is the proposed change 'justified', 'effective' and 'consistent with national policy')

Yes

No

No Comment

If you have chosen 'No', do you consider this Main Modification to the Core Strategy be unsound because:

(tick all that apply)

It is not 'justified'
(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)

It is not 'effective'
(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Whilst we remain concerned about overall soundness of the plan due to the under-provision of housing and lack of a strategic allocation at Washponds Lane, the additional text proposed in MM38 is supported.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

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FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications to the Core Strategy in the box below (e.g. MM1):

MM39

Comments without the relevant reference number will not be accepted.

Do you consider this Main Modification (in box above) proposed by the Council to be 'Sound'?

(In other words is the proposed change 'justified', 'effective' and 'consistent with national policy')

Yes

No

No Comment

If you have chosen 'No', do you consider this Main Modification to the Core Strategy be unsound because:

(tick all that apply)

It is not 'justified'
(i.e. the proposed change is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)

It is not 'effective'
(i.e. the proposed change is not deliverable, not flexible and not able to be monitored)

It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

Please use the space below to provide more detailed comments (expand box as necessary)

Whilst we remain concerned about overall soundness of the plan due to the under-provision of housing and lack of a strategic allocation at Washponds Lane, the additional text proposed in MM39 is supported.

Suggested Alterations:

Please use the space below to give details of what alteration(s) you consider necessary to make the Main Modification to the Core Strategy sound and why. Please suggest revised wording (expand box as necessary).

Guidance Note for Completing Representation Form

1. Introduction

1.1 Consultation on the Main Modifications to the Core Strategy is made as part of the examination process and responses will be considered by the Planning Inspector. The Planning and Compulsory Purchase Act 2004¹ (the 2004 Act) states that the purpose of the examination is to consider whether the Core Strategy complies with the legal requirements and is '**sound**'.

- If you are seeking to make representations on the **way** in which the Council has prepared the Core Strategy it is likely that your comments or objections will relate to a matter of **legal compliance**.
- If it is the **actual content** on which you wish to comment or object it is likely it will relate to whether the Core Strategy is **justified, effective or consistent with national policy**.

2. Legal Compliance

2.1 The Inspector will first check that the Core Strategy meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making a representation on legal compliance:

- The Core Strategy should be within the current Local Development Scheme² (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce over a 3 year period. It will set out the key stages in the production of the Core Strategy which the Council proposes to bring forward for independent examination. If the Core Strategy is not in the current LDS it should not have been published for representations.
- The process of community involvement for the DPD in question should be in general accordance with the Council's Statement of Community Involvement (SCI)³. The SCI is a document which sets out the Council's strategy for involving the community in the preparation and revision of its plans, including the Core Strategy.
- The Core Strategy should comply with the Town and County Planning (Local Development) (England Regulations) 2004 as amended⁴. Prior to submission the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The Council must also place local advertisements and notify the statutory bodies (as set out in the regulations) and any persons who have requested to be notified.
- The Council is required to publish a Sustainability Appraisal report prior to submitting the Core Strategy. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The Core Strategy should have regard to national policy set out in Planning Policy Statements/Guidance and Circulars⁵.

¹ http://www.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1

² <http://www.dorsetforyou.com/lids/purbeck> and can be viewed at District Council offices

³ <http://www.dorsetforyou.com/sci/purbeck> and can be viewed at District Council offices

⁴ <http://www.opsi.gov.uk/si/si2004/20042204.htm> (2004 regulations) and

http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf (2008 amending regulations)

⁵ <http://www.planningportal.gov.uk/planning/planningpolicyandlegislation/currentenglishpolicy>

- The Core Strategy must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. county and district). These are the Purbeck Community Plan 2009-2020⁶ and The Community Strategy for Dorset (2007-2016)⁷.

3. Soundness

3.1 To be sound a Core Strategy should be:

- **Justified**

This means that the Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts

The Core Strategy should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

- **Effective**

This means the Core Strategy should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities

The Core Strategy should also be flexible and able to be monitored by:

- Indicating who is to be responsible for making sure that the policies and proposals happen and when they will happen.
- Being flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Core Strategy should make clear that major changes may require a formal review including public consultation.
- Ensuring that any measures which the Council has included to make sure that targets are met are clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the Core Strategy needs amendment. The monitoring framework is in Appendix 3 of the Core Strategy.

- **Consistent with national policy**

The Core Strategy should be consistent with national policy. Where there is a departure, the Council must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the Council should include a policy or policies which would depart from national policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national policy and support your assertion with evidence.

⁶ <http://www.dorsetforyou.com/media.jsp?mediaid=149032&filetype=pdf> and can be viewed at District Council offices

⁷ <http://www.dorsetforyou.com/dorsetcommunitystrategy> and can be viewed at District Council offices

- 3.2 If you think the content of a Core Strategy is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:
- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
 - Is what you are concerned with covered by any other policies in the Core Strategy on which you are seeking to make representations or in any other part of the Purbeck Local Plan⁸. There is no need for repetition between documents in the Local Plan.
 - If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy and what should the policy say?

4. General advice

- 4.1 The modifications are set out in the Schedule of Main Modifications. You can only comment on these, or the Habitats Regulations Assessment Statement, or the Addendum to the Sustainability Appraisal. Comments should not be made on text that has not been modified.
- 4.2 Form A is for comments on Legal Compliance and should only be completed once. You should only comment on whether the preparation of the Proposed Changes to the Core Strategy is legally compliant, rather than commenting on earlier versions.
- 4.3 Form B is for comments on Soundness. You should complete a separate form for each proposed change. You will need to state whether each change is sound or not. If you seek to amend the Core Strategy, you should support your comments with evidence as to why it should be altered and provide alternative wording. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.
- 4.2 Where there are groups who share a common view on how they wish to see a Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 4.3 Further detailed guidance on the preparation, publication and examination of Core Strategies is provided in The Plan Making Manual⁹.

⁸ <http://www.dorsetforyou.com/ldf/purbeck>

⁹ <http://www.pas.gov.uk/pas/core/page.do?pageId=51391>

'Planning Purbeck's Future': Main Modifications to the Core Strategy Statement of Representations Procedure

The Purbeck Core Strategy will replace the Purbeck District Local Plan Final Edition (2004) as the strategic planning document. The Council submitted the Core Strategy for Examination in January 2012 and public hearings were held during May 2012. A number of issues have been raised, requiring some further amendment to the Core Strategy. These amendments are set out in the following consultation documents: Schedule of Main Modifications, Habitats Regulations Assessment Statement and Addendum to the Sustainability Appraisal (June 2012).

Subject Matter and Area Covered by the Document

Covering the period 2006-2027 the Core Strategy determines the location and distribution of new development across Purbeck District, allocating three strategic housing sites at Lytchett Matravers, Wareham and Upton. It also contains development management policies that will be used to determine planning applications.

Period for Representations

The consultation period begins **19th June 2012**. Representations received after **31st July 2012** will not be accepted. Representations should be made on the official response form, and sent to ldf@purbeck-dc.gov.uk, or by post to *Planning Policy, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP*, or fax to 01929 557348.

Please note that we will only accept representations referring to the changes shown in the 'Schedule of Main Modifications' and with the correct reference number (e.g. MM1).

The Council will forward all representations to the Inspector, there is no need to re-submit previous representations. Responses will be published.

If you wish to continue to be contacted on planning policy matters following the completion of the Examination of the Core Strategy, and/or when the inspector's report is published, and/or when the Core Strategy is adopted, please complete the attached form to confirm.

Consultation Arrangements

All consultation documents and response forms are available to view on the council's website (http://www.dorsetforyou.com/purbeck_consultation) and at the council's offices (Mon-Thurs 8:45am-4:45pm, and Fri 8:45am-4:15pm). Hard copies of the consultation documents can be purchased for £10 inc. P&P. There is no charge for the response forms.

A hard copy of the **Main Modifications to the Purbeck Core Strategy** is also available for inspection at: **Corfe Castle Library**, East Street, Corfe Castle (Mon 2.30pm-4:30pm, Wed 4:30pm-6.30pm, Sat 10am-12pm), **Dorchester Library**, Colliton Park, Dorchester (Mon 10am-5.30pm, Tue 9:30am-7pm, Wed 9:30am-1pm, Thu 9:30am-5.30pm, Fri 9:30am-7pm, Sat 9am-4pm), **Lytchett Matravers Library**, High Street, Lytchett Matravers (Mon 9.30am-1pm/2pm-5pm, Tue 2pm-5pm, Thu 9.30am-1pm, Fri 2pm-7pm, Sat 9.30am-12:30pm), **Poole Central Library**, Dolphin Centre, Poole (Mon-Fri 9am-6pm, Sat 9am-5pm), **Upton Library**, Corner House, Upton Cross, Poole (Mon 2pm-5pm, Tue 9:30am-12.30pm, Wed 9:30am-12.30pm/2pm-6.30pm, Fri 2pm-5pm, Sat 9am-12:30pm), **Lytchett Minster & Upton Town Council**, 1 Moorland Parade, Moorland Way, Upton (Mon-Thu 9am-12.30pm), **Swanage Library**, High Street, Swanage (Mon 10am-6.30pm, Wed 9:30am-5pm, Fri 9:30am-5pm, Sat 9.30am-4pm), **Swanage Town Council**, Town Hall, High Street, Swanage (Mon-Fri 10pm-1pm/2pm-4pm), **Wareham Library**, South Street, Wareham (Mon 10am-5pm, Tue 2pm-6.30pm, Thu 9:30am-5pm, Fri 9:30am-5pm, Sat 9am-12:30pm), **Wareham Town Council**, Town Hall, Wareham (Mon-Fri 10pm-1pm), **Wool Library**, D'Urberville Centre, Colliers Lane, Wool (Tue 3pm-6pm, Thu 10am-12pm, Sat 10am-12pm).