



**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	JS Bloor (Newbury) Ltd	Andrew
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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 31<sup>st</sup> 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](http://www.dorsetforyou.com/purbeck_consultation), email [ldf@purbeck-dc.gov.uk](mailto: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?

No, I do not wish to participate at the oral examination	✓ Yes, I wish to participate at the oral examination
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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:

To pursue the objections set out in these representations.

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 31 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)

A large, empty rectangular box with a black border, intended for providing detailed comments.

**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):

MM1  
Change of plan name from  
'Core Strategy' to  
'Local Plan (part 1)'

*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)

The modification proposes the name change of the policy document from core strategy to Local Plan. It goes on to suggest that "the Local Plan is part 1 of a number of local plans that will be prepared over the coming years".

Without greater explanation this approach introduces uncertainty and confusion about what the role of other 'local plans' is and what they will cover. By way of example, text in MM12 suggests that a Swanage Area Action Plan and Site Allocations Plan are proposed. Are these part 2 of a Local Plan? How does the proposed partial review set out in MM2 relate to part 1 and other parts of the 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).

The introduction of a diagram would be helpful to explain the structure and role of documents that are intended to comprise the 'Local Plan'. It needs to be made clear that part 1 (formerly known as the emerging core strategy) is an overarching strategic policy document. It should be clarified what level of policy detail is appropriate for each policy document, and what geographical area is to be covered by each.

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](http://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):

MM2  Purbeck Local Plan – Future Partial Review
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*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)

JS Bloor (Newbury) Ltd supports the principle of a partial review of the Local Plan to seek to meet objectively assessed development requirements. However the detail of MM2 gives much concern. Notably there is a lack of positive wording in the modification text, giving an impression to the reader that the council is looking for reasons not to provide for the District's development needs, rather than exploring ideas and solutions to optimise what can be achieved within the environmental constraints of Purbeck. This is inconsistent with the amended spatial objective in MM4 to 'meet as much of Purbeck's housing needs as is possible'.

There is also significant concern that the proposal for a partial review is included as re-wording to supporting text, rather than being contained within a formal policy. This suggests a lack of commitment and priority being given to meeting, as far as possible, the objectively assessed development requirements of the District. In this sense, the proposed main modification fails to comply with paragraph 14 of the NPPF.

JS Bloor (Newbury) Ltd takes issue with inaccurate or misleading statements in MM2, notably:

~~“Across the Poole and Bournemouth housing market area sufficient housing and employment is planned to meet forecasted requirements”.~~

In the absence of examined and adopted plans for the parts of the housing market area in Bournemouth Borough, Christchurch Borough and East Dorset District this statement remains to be proven. Notwithstanding this, part of Purbeck District falls within the HMA, yet the current Local Plan does not provide for the District’s objectively assessed housing needs. In conclusion, therefore, the statement cannot be true.

A further concern is that the partial review is intended to plan for growth in the “medium to longer term”, and consider a “district housing target of 170 dwellings per year for the later part of the plan period”. The forecasted requirement of 170 dwellings per annum is for the *whole* of the plan period and therefore the review should take as its starting point the objective of fully meeting development requirements where possible (ie achieving c. 3,400 homes plus commensurate employment etc *within* the twenty year plan period). Accordingly the review should commence immediately.

### **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).

A policy is required within the plan to confirm:

- An early partial review of the plan is to be commenced immediately in view of the current shortfall of provision in the Purbeck Local Plan
- That the primary purpose of the review is to seek to achieve the full, objectively assessed development requirements for Purbeck District, currently considered in housing provision terms to be some 170 homes per annum within the twenty year plan period
- That the planning authority will take a positive and exhaustive approach to seeking and reviewing opportunities to meet the full development needs of the area now and in the longer term, notwithstanding the acknowledged environmental constraints of the District, and the need for further mitigation and associated testing of proposals against the Habitats Regulations.

See also our comments here on MM8.

The proposed wording for paragraphs 1.2.1 and 1.2.2 within MM2 is too negative and should be deleted. A major re-write of supporting text in paragraph 1.2.3 is required. Wording along the lines of the following would address our concerns:

~~The Local Plan currently 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 forecasted housing need including affordable housing will not be resolved. 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 in the plan period, although it~~

recognises that this target has yet to be tested against the Habitats Regulations. Therefore, immediately following adoption of part 1 of the Local Plan, the Council will undertake a partial review to further investigate ways of meeting objectively assessed development needs in the plan period. The partial review will positively plan for growth in the medium to longer term and will be started by the end of 2015. ~~The partial review and~~ will need to consider the following:

- A district housing target of 170 dwellings per year ~~for the later part of~~ in the plan period, 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 ongoing duty to co-operate on cross boundary matters, including the role of Purbeck in facilitating the planning and delivery of any further proposed strategic growth at Crossways as may be proposed in the West Dorset, Weymouth and Portland Local Plan the Local Plans of adjoining Districts;
- Additional settlement extensions to help satisfy Purbeck's housing needs;
- A ~~longer term~~ strategic review ~~to~~ of Green Belt including the potential to identify additional land for future growth within the current plan period and beyond;
- Identifying opportunities to work proactively with large landowners to ensure a strategic, comprehensive and integrated approach to the management and development of land, including that the cumulative impact of new housing in the countryside provides opportunities to improve the sustainability of rural settlements, measures to enhance landscape character, conservation and biodiversity interests, and provide the provision of local and strategic mitigation measures for European protected sites;
- The enhancement of biodiversity and habitats.

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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 in the box below (e.g. MM1):

MM3  
  
Duty to  
Cooperate

*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)

JS Bloor (Newbury) Ltd welcomes the introduction of more explicit statements within the plan of how the duty to cooperate is and will continue to be fulfilled.

There is, however, concern about the proposed wording of paragraphs 1.5.2 and 1.5.3.

Paragraph 1.5.2 is misleading in that it states that sufficient housing and employment is provided by the ‘adopted or nearly adopted core strategies’ of Poole, Bournemouth, Christchurch (and East Dorset?) councils to meet their own needs. The question of whether adequate provision is being made is currently being tested in the Bournemouth core strategy examination, and the Christchurch and East Dorset core strategy has yet to reach public examination stage. It is therefore inappropriate to conclude at this time that these core strategies are ‘nearly adopted’ or that they make adequate development provision.

Similarly, the proposals for strategic growth at Crossways referenced in paragraph 1.5.3 are currently out to public consultation for the first time, and there is no certainty that they will remain part of the Weymouth, Portland and West Dorset Local Plan. It is considered that the duty to co-operate in terms of links to Moreton station and examining the cumulative impacts of such development on the integrity of European protected heathland is something that should have been considered jointly by West Dorset District Council and Purbeck District Council prior to proposals for Crossways being subject to public consultation. If Crossways is a firm proposal, it is considered that it needs to be considered within the Habitats Regulation Assessment of the Purbeck Local Plan given the potential for cumulative impacts of plans or projects on the integrity of the SPA.

**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).

Notwithstanding the proposed 'memorandum of understanding' to be produced by local authorities in the Dorset LEP area, paragraph 1.5.1 would benefit from a more specific explanation of the 'matters of a strategic nature that may steer any future review of the Local Plan'. It is considered that these include determining and meeting objectively assessed development needs of South East Dorset and Purbeck District, together with ensuring adequate strategic infrastructure provision (notably transport, and the ecological mitigation matters associated with Poole Harbour and the Dorset Heathlands).

Paragraph 1.5.2 should be deleted.

Paragraph 1.5.3 requires qualification that the joint working relates to an 'emerging' strategic proposal at Crossways in the Weymouth, Portland and West Dorset Local Plan that remains to be fully conceived and tested in terms of suitability and deliverability and cumulative impacts upon European protected sites / Habitats Regulations Assessments. It should also make clear that the proposal has yet to be tested at public examination.

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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 in the box below (e.g. MM1):

MM8 Shortfall of housing supply
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*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)

JS Bloor (Newbury) Ltd’s comments on MM8 are similar to those expressed on MM2.

The concern is that the wording in 6.1.5 fails to fully communicate the current level of under-provision associated with the current Local Plan content and the importance and urgency of action required to seek to address this through a partial review of the Local Plan (part 1).

For example, in terms of housing it was clarified at the recent Examination hearings that the objectively assessed housing requirement of Purbeck by reference to latest Strategic Housing Market Assessment data is c. 3,400 homes in the plan period 2006-2027, but that the current Local Plan content makes provision for c. 2,520 dwellings. A formal policy statement is required in the plan to clarify how proactive attempts to address this underprovision will be progressed.

**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).

A policy is required within the plan to confirm:

- An early partial review of the plan is to be commenced immediately in view of the current shortfall of provision in the Purbeck Local Plan
- That the primary purpose of the review is to seek to achieve the full, objectively assessed development requirements for Purbeck District, currently considered in housing provision terms to be some 170 homes per annum within the twenty year plan period
- That the planning authority will take a positive and exhaustive approach to seeking and reviewing opportunities to meet the full development needs of the area now and in the longer term, notwithstanding the acknowledged environmental constraints of the District, and the need for further mitigation and associated testing of proposals against the Habitats Regulations.

See also our comments here on MM2.

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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 in the box below (e.g. MM1):

MM31  
Policy NE

*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)

JS Bloor (Newbury) Ltd considers that MM31 does not provide the most appropriate alternative strategy in the event that suitable mitigation measures for the land allocated at Huntick Road, Lytchett Matravers cannot be agreed.

It is considered that the additional options for provision of housing at Lytchett Minster should be included if the search for an alternative site is required.

**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).

It is recommended that the wording is changed as follows:

If suitable mitigation measures cannot be agreed between the Council and the landowner, the partial review of the Purbeck Local Plan or a neighbourhood plan will review the allocation and if necessary allocate an alternative site in ~~the village~~ North East Purbeck, requiring a further review of the Green Belt boundary ~~around Lytchett Matravers~~.

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](http://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):

MM80  
SANGs  
Appendix

*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)

JS Bloor (Newbury) Ltd welcomes steps to provide clarification on SANGs provision, but has concern with some of the content of Appendix 5. The main issues identified are as follows:

- To what extent are the *quality* guidelines consistent with advice being provided elsewhere in South East Dorset? Is the forthcoming Joint Heathlands DPD a better place to present and consult upon consistent guidelines?

continued

- There is a lack of guidance on the *quantitative* requirements for SANGs. This is inconsistent with the approach to provision being taken by authorities in the comparable Thames Basin Heaths area. Will this be a role for the forthcoming Joint Heathlands DPD? The lack of any clear guide on quantitative standards for SANGs provision, and evidence presented to support the standard, is a concern in terms of the soundness of the Local Plan / Core Strategy.
- The wording of the quality guidelines appears inflexible in places. By definition a guideline is not mandatory. Substitution of the word 'must' with 'should ideally' is appropriate to reflect the practicalities of provision.
- Where will guidance on 'management of SANGs', 'SANGs capacity' and 'other relevant avoidance and mitigation measures' be found? It is a concern if these matters are being left to case by case discussion rather than being outlined in policy guideline form for consistency. Again is this a role for the Joint Heathlands DPD?

### **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).

There needs to be more clarity on the role of the Local Plan (Core Strategy) in offering guidelines for SANGs provision, and the role of the forthcoming Joint Heathlands DPD. Consistent guidelines and standards for qualitative *and* quantitative provision of SANGs in South East Dorset are needed. A statement is required in the Local Plan on where the appropriate guidelines and standards will be provided.

For practical purposes it is suggested that the wording of qualitative guidelines for SANGs provision involve the removal of 'must provide' with 'should provide' for flexibility and effective delivery.

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