

JR/P4669  
31 July 2012

Planning Policy  
Purbeck District Council  
Westport House  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

**For the attention of Mr Steve Dring**

Dear Sirs

**Purbeck Core Strategy – Schedule of Main Modifications**

Please find enclosed representations made on behalf of our client (ZBV (Winfrith) Ltd) to the 'Purbeck Core Strategy – Schedule of Main Modifications' consultation (June/July 2012).

The attached representations have also been submitted to the Council via email. However, for the sake of completeness, we also enclose hard copies of our representations to the Main Modifications on individual representation forms. Furthermore, we also enclose the following additional supporting information, which is referred to within our representations, namely:

- **A review of the Sustainability Appraisal accompanying the Main Modifications (completed by Waterman);**
- **An updated version of the SANGS Report** (prepared by Terry Farrell & Partners and Waterman) which sets out the revised approach towards the provision of SANGS mitigation to support the regeneration of the Dorset Green Technology Park site. The updated report reflects the recent discussions/meetings with Natural England.

**Summary**

Both the Council and the Inspector will be aware that ZBV (Winfrith) Ltd has already made a number of submissions (both in writing and at the recent Examination in Public – EiP) on the general conformity of Purbeck's Core Strategy with the recently published National Planning Policy Framework (NPPF). Our submissions have outlined our concern that the Core Strategy/Local Plan continues to be inconsistent with a number of the NPPF policy requirements, particularly in relation to promoting/delivering sustainable development, promoting economic growth and meeting housing needs.

Furthermore, we have also previously drawn attention to areas/policies where the Core Strategy/Local Plan has failed to properly address the objectives for 'Plan-making' (paragraphs 150-182 of the NPPF), particularly in terms of planning positively to meet identified demands, and

ensuring that policies are based on ‘adequate, up-to-date and relevant evidence’.

Having reviewed the proposed Main Modifications we remain of the view that the amendments made to the Plan represent nothing more than a ‘light touch’ and do not go far enough in addressing the fundamental inconsistencies with the NPPF. Indeed, we note (from paragraph 2.15.2 of the Council’s own Statement on Implications of the NPPF - April 2012) that the Council accepts that the Core Strategy/Local Plan does not include all of the additional requirements set out in the NPPF.

However, Annex 1 of the NPPF is clear that the policies contained within NPPF are material considerations, which local planning authorities should take into account from the day of its publication. Furthermore, it is made clear that the framework must also be taken into account in the preparation of plans. On this basis, the NPPF advises that “Plans may, therefore need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan” (paragraph 213).

It continues to be our view that the plan should be brought into general conformity with the NPPF as a matter of urgency and prior to its formal adoption, to ensure that it meets the test of soundness and can be considered legally compliant. We are therefore concerned that the Council is continuing to rely upon the completion of a partial review in 2015 (alongside the preparation of a number of subsequent plans - including the preparation of an economic strategy) to address the requirements of the NPPF – particularly in relation to meeting Purbeck’s housing needs.

This approach is not considered to conform with Annex 1 of the NPPF and it continues to be our view that this work should (and could) have been completed prior to the submission of the Core Strategy. Furthermore, the Council’s aspiration to commence the majority of this additional work in c.2015 will mean that the Core Strategy will not be consistent with the NPPF for a further 3 years (at a minimum). This will not only lead to a period of confusion, but will also expose the Council’s planning decisions to a greater risk of appeal and legal challenge.

In addition to the above, it is also apparent that the Council has made a significant number of modifications to the plan both during and after the recent EiP. However, the Council is only consulting on those amendments identified as Main Modifications, whereas the Additional Modifications (identified in blue and red in the amended Core Strategy) have not been subject to any formal consultation process. In our view, the proposed modifications (as a whole) should be subject to consultation and (due to their extent/nature) be subject to further examination at an EiP.

As a result of the above, we continue to be concerned that the Core Strategy/Local Plan (including the proposed modifications) is fundamentally inconsistent with the NPPF and cannot therefore be considered to be sound or legally compliant.

### **Achieving a suitable SANGS in support of the regeneration of Dorset Green Technology Park**

We would also bring it to the Council and Inspector’s attention that ZBV (Winfrith) Ltd has continued (since the EiP) to work with Natural England to identify options for providing appropriate on-site mitigation (in the form of a SANGS) to support a mixed-use development (including a reduced residential component) at the DGTP site. Those discussions have identified the potential for reducing the scale and altering the phasing of the residential development to enable a significant on-site SANGS to be delivered which can meet Natural England’s requirements.

Purbeck Core Strategy – Schedule of Main Modifications  
31 July 2012

The revised SANGS approach and amended DGTP Masterplan drawing are included as part of our submissions/representations to the proposed Main Modifications. These collectively demonstrate how a SANGS of 24.6 hectares can be provided on-site (on the land to the south of the access road), alongside an additional 4.6ha of heathland support areas (on-site) and potential for a further 21ha of off-site heathland support (on land also owned by ZBV (Winfrith) Ltd). Collectively, the proposed mitigation can support a residential development of 450 residential units – alongside the wider Masterplan objectives. This approach will be further supported by the proposed Strategic SANGS being promoted by the Council at Coombe Wood (to the north of Wool). The proposed approach has been identified by Natural England as the preferred option for bringing the DGTP site forward for redevelopment.

As set out in our evidence at the EiP, the provision of a mixed-use development at the DGTP site has potential to deliver economic growth alongside significant new housing (including affordable housing) – thereby making a substantial contribution towards addressing Purbeck’s needs. Added to this, the proposed mixed-use approach, proximity to public transport and the inclusion on-site of a consented renewable energy plant, provides the opportunity to achieve a highly sustainable (zero carbon) development which will accord with a number of the objectives set out within the NPPF.

On the basis that there is now the opportunity for suitable on-site mitigation (in the form of a substantial on-site SANGS) to be provided in conjunction with a mixed-use development (with the support of Natural England moving forward), we would urge the Council and Inspector to consider the identification/allocation of the DGTP site as a Strategic Site within the Core Strategy to accommodate employment and housing growth.

We trust that the enclosed is of assistance and we would be grateful for your confirmation that our representations have been received and will be forwarded to the appointed Inspector.

Yours faithfully

Jon Roshier  
**Rolfe Judd Planning**

Enc.



**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		Jon Roshier
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	ZBV (Winfrith) Ltd	Rolfe Judd Planning
Address	C/O Agent	Old Church Court, Claylands Road, The Oval, London
Postcode		SW8 1NZ
E-mail		<a href="mailto:jonr@rolfe-judd.co.uk">jonr@rolfe-judd.co.uk</a>
Tel. Number		020 7556 1500

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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?

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

Our client is promoting the regeneration of Dorset Green Technology Park - a strategic brownfield employment site within Purbeck. A number of representations were previously submitted on behalf of our client in response to the earlier rounds of public consultation on the local plan and submissions were made at the original EiP hearings.

Our client is keen to continue to input into the formulation of local planning policy in Purbeck.

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 Jon Roshier

Date 31/07/2012

### 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)

Both the Council and the Inspector will be aware that ZBV (Winfrith) Ltd has already made a number of submissions (both in writing and at the recent Examination in Public – EiP) on the general conformity of Purbeck’s Core Strategy with the planning policy framework set out by the recently published National Planning Policy Framework (NPPF). Following the recent EiP the Council has made a number of modifications to the Core Strategy/Local Plan to address points/matters raised by the Inspector at the EiP and to respond to the publication of the NPPF.

Our submissions have set out our genuine concern that the Core Strategy/Local Plan is inconsistent with a number of the NPPF policy requirements, particularly in relation to promoting/delivering sustainable development, promoting economic growth and meeting housing needs. Furthermore, we have also previously drawn attention to areas/policies where the Core Strategy/Local Plan has failed to properly address the objectives for ‘Plan-making’ (paragraphs 150-182 of the NPPF), particularly in terms of planning positively to meet identified demands, and ensuring that policies are based on ‘adequate, up-to-date and relevant evidence’.

Having reviewed the proposed Main Modifications we remain of the view that the amendments made to the Plan are no more than a ‘light touch’ and do not go far enough in addressing the fundamental failings of the Core Strategy/Local Plan and inconsistency with the NPPF. Indeed, we note (in paragraph 2.15.2 of Purbeck’s Statement on Implications of the NPPF – April 2012) that the Council accept that “it is not possible at this late stage to include all of the additional requirements set out in the NPPF”. The Statement suggests that this would “unduly delay economic development (e.g. house building)”.

However, Annex 1 of the NPPF is clear that “the policies contained within this Framework [NPPF] are material considerations which local planning authorities should take into account from the day of its publication. The Framework must also be taken into account in the preparation of plans” (paragraph 212). As result, the NPPF advises that “Plans may, therefore need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan” (paragraph 213). The Government has provided a 12 month period (up to March 2013) for local planning authorities to bring their local plans into general conformity with the NPPF.

It is therefore imperative that the plan is brought into general conformity with the NPPF as a

matter of priority and prior to formal adoption, both to ensure that it is both sound and legally compliant. It is apparent that the Plan (by the Council's own admission) is reliant upon the completion of a partial review, along with the preparation of a number of subsequent plans (including the preparation of an economic strategy) to meet the requirements of the NPPF. It continues to be our view that this work should (and could) have been completed prior to the submission and EiP into the Core Strategy.

Furthermore, the Council's aspiration to commence the majority of this additional work in c.2015 will mean that the Core Strategy will not be consistent with the NPPF for a further 3 years (at a minimum). This will not only lead to a period of confusion, but will also expose the Council's planning decisions to a greater risk of appeal and legal challenge.

We have also highlighted where the Council has failed to properly respond to recommendations of GoSW and the findings of their own evidence base which has suggested that further housing growth could reasonably be accommodated within the Borough without detrimentally impacting upon the European protected sites. Again, this is considered to conflict with the requirements of the NPPF.

Furthermore, we find it perverse that the Council is supportive of an alternative employment/residential development at Crossways in West Dorset (as noted in paragraph 2.15.4 of their Statement) in order to help meet Purbeck's housing needs, rather than seeking to support investment in and the regeneration of their existing strategic employment sites within Purbeck (particularly where there is also the opportunity for housing growth – i.e. at DGTP).

Similarly, it is noted (in paragraph 2.17.1 of the Council's statement) that the Council is also relying upon the over provision of housing within the Bournemouth/Poole conurbation to help meet Purbeck's own housing needs. As per the representations submitted at the EiP, the NPPF is clear that local planning authorities should objectively assess their own housing and employment needs and look to meet these needs within their own area. Added to this, Purbeck cannot be certain that the suggested 'over provision' will occur or indeed would be suitably located to meet the Purbeck's needs.

By way of a summary, we do not consider the Core Strategy/Local Plan to be either legally compliant or sound for the following reasons:

- Purbeck's proposed housing targets fall significantly short of meeting identified housing need (and the previous RSS housing target) for both market and affordable housing. Both GoSW and the Council's own evidence base has recommended that there is the opportunity (both on sustainability and environmental grounds) to accommodate additional housing growth in and around Wool. However, this opportunity (which has the potential to deliver a significant quantum of new housing in a sustainable location) has not been investigated further or taken forward with the plan;
- In recognition of this the Council has committed to undertaking a partial review (by 2015). However, the timing, scope and options to be considered by the review is unclear. As a result, the Council is, and will continue, to significantly fail to meet housing need and will not

therefore meet the requirements of paragraph 47 (of the NPPF);

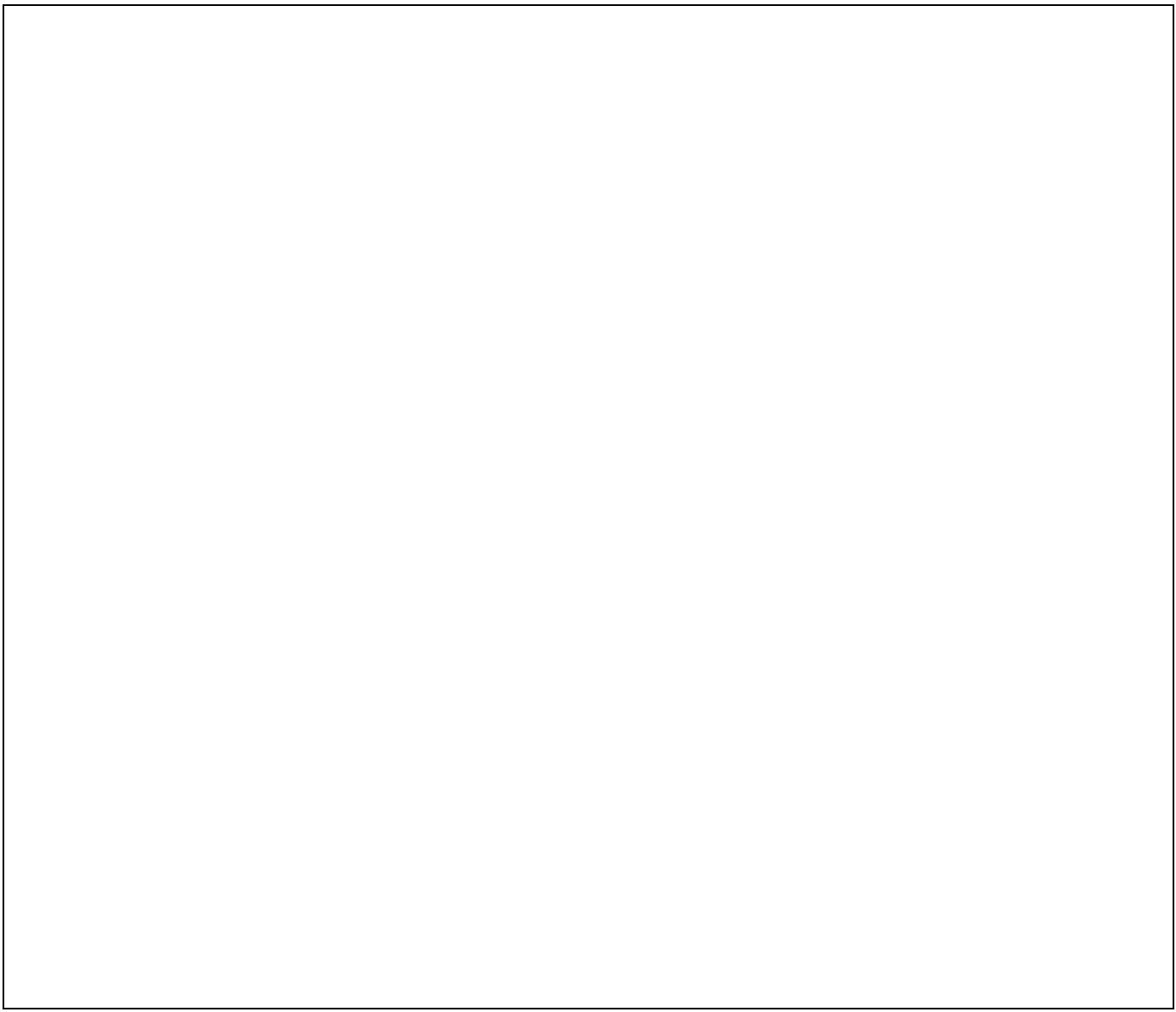
- The Council has demonstrably failed to produce an economic vision/strategy to guide new economic development within Purbeck – rather this is left to subsequent plans (contrary to paragraph 21 and paragraphs 160 and 161 of the NPPF). As a result, there is no clear policy approach/direction towards the Strategic Employment Sites (including DGTP) and the opportunity/options for promoting employment growth/development have been left in a state of limbo. This is further confused by the indication that the Council will support employment development at Crossways (only 5 miles from DGTP) without any clear reason/justification;
- Despite the recommendations of GoSW, the Council has not explored the opportunity to link housing and employment growth within Purbeck (a core sustainable development aspiration);
- The plan continues to fail to provide any clear policy guidance on the opportunities to improve or deliver economic growth at the DGTP site (which provides approximately 50% of the District's employment land). Considerable evidence has been submitted both to previous consultations and at the EiP, to outline concerns over the medium/long-term commercial sustainability of the site. A number of options have been promoted over the last 5 years which target the regeneration of the DGTP site and the opportunity to secure a more sustainable pattern of development. However, the Council has instead constantly changed its policy approach towards the site, which continues to provide little support for new investment and the regeneration of DGTP. Furthermore, the Council has consistently failed to identify, test and evaluate reasonable alternatives that reflect the current role and future opportunity presented by the DGTP site as the largest brownfield site within Purbeck. Again, this is considered to be a significant failing of the plan and contrary to the NPPF.

In addition to the above, it is also apparent that the Council has made a significant number of modifications to the plan before, during and after the recent EiP. However, the Council is only consulting on those amendments identified as Main Modifications, whereas the Additional Modifications (identified in blue and red in the amended Core Strategy) have not been subject to consultation.

In our view, the Council should have completed a full consultation on all changes to the plan (not just the Main Modifications) since a number of the additional modifications result in changes in the emphasis of certain key policies and the approach to several sites (including DGTP). Furthermore, the extent of the modifications proposed (collectively) constitutes a major change to the plan which should, as a minimum, be subject to a further EiP (notwithstanding our concerns on the compliance with the NPPF).

As a result of the above, we remain concerned that the Core Strategy/Local Plan (including the proposed modifications) is fundamentally inconsistent with the NPPF and cannot therefore be considered to be sound or legally compliant. Furthermore, we are concerned over the level of consultation undertaken on the proposed revisions to the plan (which appears to have omitted the Additional Modifications) and the approach taken within the sustainability appraisal.





**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
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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 evidencebase 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)

There continue to be a number of references within the 'Main Modifications' to the preparation of subsequent plans, however, there is very little detail on what future 'plans' will be prepared and the extent of their scope. It is therefore difficult to assess, with any certainty, how these plans will support the delivery of the Local Plan and ensure that the Core Strategy (as a whole) meets the requirements of NPPF.

Furthermore, it is also noted that the Council is yet to update the Purbeck LDS to reflect the Submission Version of the Local Plan and the numerous references to 'subsequent 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).

Please see our comments above

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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):

MM2
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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 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 evidencebase 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)

Main Modification MM2 states in paragraphs 1.2.1 and 1.2.2 that Purbeck District is 'exceptionally' constrained as one-fifth of the District is covered by statutory environmental designations with the implication that future growth will be limited and achieving housing growth to meet local needs is challenging. The proposed modification therefore sets out the Council's intention to complete a 'partial review' of the Local Plan before the end of 2015 (3 years after the adoption of the plan) in order to investigate options for meeting housing needs within Purbeck (in the medium and longer term).

Paragraph 47 of the NPPF is clear that local planning authorities (LPAs) are expected to "boost significantly the supply of housing". To achieve this, LPAs should "use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing". It is therefore incumbent upon Purbeck to demonstrate that they have reasonably and robustly investigated every opportunity to ensure housing capacity/supply

meets the identified housing need.

Purbeck District Council accepts that the current housing target set out within the draft Core Strategy (2,520 new dwellings) falls significantly short of projected housing need within Purbeck (4,000 new dwellings). The Council also accepts that this short-fall in provision will critically impact upon the delivery of affordable housing within the District (which there is a significant and urgent need). The Council has indicated that this short-fall is a result of the exceptional environmental constraints which limit development opportunities.

However, in arriving at the proposed housing target Purbeck has not taken into account (or thoroughly tested) the conclusions reached by the Council's own assessment work (entitled: 'Implications of Additional Growth Scenarios for European Protected Sites'- Sept 2010), which identified the opportunity to potentially accommodate up to 1,000 new homes in and around Wool (subject to suitable mitigation). Similarly, the Council did not act on advice from GoSW, which recommended that housing growth be linked to employment growth and Purbeck's two strategic employment locations (at DGTP and Holton Heath) be considered as 'fix points' around which housing distribution should be explored.

The work required to identify, test, evaluate and select an appropriate housing target for Purbeck that meets objectively assessed housing need, is a pre-requisite for the Local Plan to be considered effective and therefore sound. The partial review proposed fails to support a soundly drawn plan as it will not commence for at least three years from the Local Plan's adoption and leaves considerable uncertainty over the ability of the District to meet housing need or to plan proactively for the delivery of strategic sites (or even to show that such identified sites are the most appropriate choices).

Furthermore, it is apparent key opportunities to accommodate significant additional housing growth have not been brought forward (despite the recommendations of GoSW and the Council's own assessment work). We therefore continue to be of the view that the Core Strategy is significantly under providing for new housing growth and opportunity exists to deliver higher levels of housing (than the current target) within the plan period. Indeed, the Council's proposal to complete a partial review appears (on the face of it) to be a clear acknowledgement of this point. Consequently, we continue to be of the view that the Core Strategy (incorporating the proposed main modifications) demonstrably fails to accord with the requirements of the NPPF (particularly paragraph 47).

The proposed modification confirms that the Council intends to commence the review by the end of 2015, some three years from the adoption of the Local Plan. We understand from the Council's submissions as the EiP that this is due to resourcing (rather than planning) considerations. As we outlined in our submissions to the EiP, a partial review of the Plan in this manner is wholly unacceptable; if its purpose is simply to allow the Council to adopt a plan now to avoid a policy vacuum.

Added to this, the list of considerations for the partial review suggests a comprehensive exercise to establish housing numbers; more so than the title 'partial review' would suggest. We are concerned that such a review is inappropriate and that the work needs to be undertaken now before the Local Plan is adopted, but also that the extent of the issues to be taken into consideration, including: testing of housing numbers against Habitat Regulations, transport constraints, the economic/homes balance, the role of Purbeck to support growth

outside the District at Crossways, review of the Green Belt and various other factors means that, in effect, the partial review, could result in an entirely different spatial planning approach to Purbeck (than that presented in the draft Core Strategy). This will result in a high level of uncertainty; in particular a partial should not be utilised as a means to fix the fundamental problems with the Core Strategy (which very much appears to be the case).

We therefore support the need for a 'review' of the Core Strategy in order to properly investigate options for accommodating additional housing growth within Purbeck, but this fundamental work should be completed immediately and prior to the adoption of the local plan.

Notwithstanding our comments above, we also have a number of concerns over the contents/scope of the proposed 'review' as set out in New Section 1.2:

- paragraph 1.2.1 – whilst it is acknowledged that the highway network does suffer from congestion, we would remind the Council that at the recent EiP Dorset County Council Highways Team confirmed that subject to the implementation of a Travel Plan a mixed-use development at the Dorset Green Technology Park (DGTP) could be acceptably accommodated within the existing road/public transport infrastructure (and without the need for the construction of new roads). Again, this highlights the opportunities presented by DGTP site (and Wool);
- paragraph 1.2.3 appears to suggest that the Council is continuing to rely on the delivery of housing in and around Poole/Bournemouth to meet (in part) Purbeck's housing needs. As highlighted in the GoSW letter and as discussed at EiP, Purbeck cannot simply ignore its part in meeting the SE Dorset's housing needs and it is not appropriate (or reasonable) to rely on Poole and Bournemouth to accommodate additional growth in order to off-set any shortfall in local housing delivery. Section 6 of the NPPF is clear that local planning authorities should objectively assess their own housing and employment needs and look to meet these needs within their own area. Added to this, Purbeck cannot be sure (with a reasonable degree of certainty) that the suggested 'over provision' will occur or indeed would be suitably located to meet the Purbeck's needs;
- the mechanism for the partial review, set out in the bullet points following paragraph 1.2.3 and the proposed trigger mechanism ('annual monitoring of cumulative housing completion') set out in Annex 1: Appendix 3 Monitoring Framework (p.72) fails to recognise the Local Plan's duty to set out now the appropriate level, distribution and mix of housing necessary to meet Purbeck's housing needs before it is adopted. This is further compounded by the proposed acceptance of a future dwelling rate of 170 new homes per annum which fails to recognise that the recent Strategic Housing Market Assessment clearly identified a requirement for 520 new dwellings per annum in order to meet housing need as the NPPF requires (note: it is unclear how the housing target of 170 dwellings per year in Purbeck has been derived);
- it is noted that the Council is intending to start the partial review by the end of 2015 – meaning that any changes to the plan (and increase in the housing target) may not be adopted until 2018/19. This delay will mean that housing delivery in Purbeck will fall even further behind identified housing need – leading to an increasing housing short-fall (particularly in affordable housing), which in turn will make the local housing market unaffordable for an increasing proportion of the population. Furthermore, the approach taken by the Council is likely to

prevent new (unallocated) strategic sites from coming forward in the interim period and before the completion of the review (notwithstanding whether they can accommodate new housing and successfully mitigate any environmental impact).

- in line with the recommendations of the Council's own assessment work (entitled: 'Implications of Additional Growth Scenarios for European Protected Sites'- Sept 2010), the review should expressly investigate the opportunities for accommodating additional housing growth in and around Wool and at the DGTP site. As set out in our previous representations the DGTP site exhibits a number of credentials in terms of sustainability – which was recognised by the Inspector at the recent EiP. Accordingly, it should be made clear that Wool/DGTP is a preferred location for accommodating new housing growth;
- we continue to find it perverse that the Council is supportive of an alternative employment/residential development at Crossways in West Dorset in order to help meet Purbeck's housing needs, rather than seeking to support investment in and the regeneration of their existing strategic employment sites within Purbeck (particularly where there is also the opportunity for housing growth – i.e. at DGTP). It is evident that the Crossways site is not as well located (from a sustainability view-point), does not benefit from an established base of high tech knowledge driven firms, and does not present as many opportunities (i.e. for linking housing growth to employment growth, utilising on-site renewable energy production etc) when compared to the DGTP site. Furthermore, the Crossways proposals are yet to be fully tested from an environmental perspective.



**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).

Annex 1 to the NPPF is clear that “policies in this Framework apply from the day of publication” (paragraph 208) and that “the Framework must also be taken into account in the preparation of plans” (paragraph 212). The NPPF goes on to state that “Plans may, therefore, need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan” (paragraph 213). It continues to be our view that the completion of the review is fundamental to ensuring that the Core Strategy meets the requirements of the NPPF. On this basis (and to accord with the requirements of Annex 1), the intended review should be completed as a matter of urgency and prior to the adoption of the Core Strategy.

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):

MM3
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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 evidencebase 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)

We would draw the Council’s attention to paragraph 160 of the NPPF which advises to LPAs to “work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability”. This should be a key element in ensuring the deliver of sustainable economic growth within Purbeck and should also be incorporated within Section 1.5.

As per our representations in relation to MM2, we continue to find it perverse that the Council is supportive of an alternative employment/residential development at Crossways in West Dorset in order to help meet Purbeck’s housing needs, rather than seeking to support investment in and the regeneration of their existing strategic employment sites within Purbeck (particularly where there is also the opportunity for housing growth – i.e. at DGTP).

It is evident that the Crossways site is not as well located (from a sustainability view-point), does not benefit from an established base of high tech knowledge driven firms, and does not it present as many opportunities (i.e. for linking housing growth to employment growth, utilising

on-site renewable energy production etc) when compared to the DGTP site. Furthermore, the Crossways proposals are yet to be fully tested from an environmental perspective and in terms of its potential impact upon the European Protected Sites.

Added to this, there is a genuine risk that an employment development at Crossways will directly compete with DGTP as an employment location - and could hamper employment growth/development within Purbeck. Given the absence of an economic strategy (or credible evidence base), there does not appear to be any justification/rationale for the Council supporting such an untested development - particularly when it may impact upon employment/economic delivery within Purbeck.

**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).

Please see comments above.

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)

# 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 2004<sup>1</sup> (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 Scheme<sup>2</sup> (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)<sup>3</sup>. 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 Country Planning (Local Development) (England Regulations) 2004 as amended<sup>4</sup>. 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 Circulars<sup>5</sup>.

<sup>1</sup> [http://www.opsi.gov.uk/ACTS/acts2004/ukpga\\_20040005\\_en\\_1](http://www.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1)

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

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

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

[http://www.opsi.gov.uk/si/si2008/pdf/uksi\\_20081371\\_en.pdf](http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf) (2008 amending regulations)

<sup>5</sup> <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 2009-2020<sup>6</sup> and The Community Strategy for Dorset (2007-2016)<sup>7</sup>.

### 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.

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

<sup>7</sup> <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 Plan<sup>8</sup>. 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 Manual<sup>9</sup>.

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

<sup>9</sup> <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 **31<sup>st</sup> July 2012** will not be accepted. Representations should be made on the official response form, and sent to [ldf@purbeck-dc.gov.uk](mailto: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](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).



**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):

MM4
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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 evidencebase 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 order to reflect the objectives of the NPPF, Spatial objective 2 should be amended to accord with paragraph 47 - namely: “To boost significantly the supply of housing within Purbeck”.

The original drafting of Spatial Objective 2 was a more appropriate objective and one that conformed to the requirements of the NPPF at paragraphs 47 and 159. We consider that such a change to the Spatial Objective would undermine the integrity of the Plan’s vision and spatial objectives, as a whole, fail to ensure the adequate supply and delivery of new homes and is, in its own right a vague and ill-defined modification that is incapable of effective monitoring.

**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).

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):

MM5
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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 evidencebase 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)

We welcome the insertion of the Government’s model policy setting out the presumption in favour of sustainable development. However, it is important that the Core Strategy also acknowledges that this presumption “should be seen as a golden thread running through both plan-making and decision-taking” (paragraph 14 of the NPPF). Consequently, this presumption should not only be the starting point for the formulation of the development plan, but also the starting point for the formulation of each and every policy within the Core Strategy.

From the evidence heard at the EiP and the approach set out within the Council’s Main Modifications, we remain concerned that the Core Strategy (even following the insertion of the model policy) will still fail to promote/support sustainable development. In particular:

- the NPPF is clear that there are three dimensions to sustainable development, namely: economic, social and environmental. These 3 elements should not be seen in isolation, rather they are mutually dependent. The NPPF states that “economic, social and environmental gains should be sought jointly and simultaneously through the planning system” (paragraph 8).

However, the Core Strategy, as currently drafted (and incorporating the Main Modifications), does not present a combined approach to these key issues and certain key policy elements are absent. For instance, the Council is yet to prepare an economic vision and strategy to guide economic growth and investment (rather this is left to 'subsequent plans' – to be prepared at some-point in the future). As a result, the Core Strategy cannot successfully seek to co-ordinate housing growth along-side economic growth (a core objective of the NPPF);

- the Council's own evidence base suggests that there is potential to accommodate additional housing growth within the Borough without detrimental impact upon the unique Purbeck environment, but these opportunities have not been thoroughly investigated (and the Council is proposing to leave further investigation to a later review). As such, it is unclear how the Council will deliver meaningful sustainable development both now and in the future;
- we have previously drawn reference to the GoSW letter (of Nov 2009) which stated that 'balancing homes, jobs and access to services' was not only a key spatial driver in the emerging RSS, but also a fundamental sustainable development principle (and continues to be at the heart of the NPPF). GoSW therefore urged the Council to consider identifying Purbeck's two strategic employment locations (at DGTP and Holton Heath) as 'fix points' around which housing distribution should be explored. However, no evidence was offered by the Council at the EiP to confirm why these recommendations have not been investigated further or carried forward into the plan. Indeed, Policy LD as currently drafted purposely excludes both employment locations from the settlement hierarchy (thereby removing both from preferred locations for new development) and instead identifies the sites as 'exception sites' within the Countryside (under Policy CO). Again, this key sustainable development objective is absent from the Core Strategy;

Added to this, we remain concerned that the Core Strategy (incorporating the proposed Main Modifications) still fails to properly reflect the twelve core land-use planning principles (set out in paragraph 17 of the NPPF) which should underpin both plan-making and decision-taking. This appears to be a key omission and it continues to be our view that there are conflicts/inconsistencies between the Core Strategy and the identified core planning principles included within the NPPF – in short:

- the continued identification of the Borough's major strategic employment sites (Dorset Green Technology Park and Holton Heath) as falling outside the settlement hierarchy and within the Countryside (and thereby assessed under Policy CO) remains confused. Whilst Policy CO identifies both sites as 'exceptions' to the normal policy approach, the very inclusion of the employment sites within the countryside designation clearly implies a restrictive approach towards future development in these locations – which will create uncertainty for investors and funder;
- as noted above, the Core Strategy (Policies LD, HS, ELS and CO) falls short of promoting "sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs";
- the Council has not (through the evidence presented to-date) made "every effort" to objectively identify and then meet housing, business and other development needs of an area, and respond positively to wider opportunities for growth (i.e. the Council has not acted on the recommendations of their study entitled 'Implications of Additional Growth Scenarios for European Protected Sites – Sept 2010', and the opportunity to deliver 1,000 new homes in and around Wool);
- in order to support the transition towards a low carbon future the Council should also be looking to focus new development close to existing/proposed renewable energy sources

(which can provide district heat networks and green power to support new development);

- it would appear that the Council's approach towards site allocations/designations does not 'prefer land of lesser environmental quality' or 'previously developed brownfield land'. Rather, the Council is reliant upon green field sites located within the Green Belt to deliver housing growth (notwithstanding that brownfield sites – such as DGTP – are being promoted for redevelopment);
- there is no policy presumption in favour of the 'effective use of land' by 'reusing land that has been previously developed (brownfield land)'. Indeed, the Council appears to be favouring Greenfield development sites (including sites within the existing Green Belt) over an above previously developed brownfield sites (such as DGTP);
- the Core Strategy, as currently drafted, does not include a policy promoting mixed-use developments (a key strand in achieving sustainable development). Indeed, there is no evidence to suggest that the proposed distribution of housing (set out in Policy HS) relates to options/locations for economic and employment growth (or the existing/proposed employment locations within the Borough);
- the Council's 'Spatial Distribution of Development' policies do not, in our view, "actively manage growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable". In particular, the failure of Policy SW to support/promote any new development in and around Wool (which exhibits a number of sustainability credentials – including main-line rail access) is considered to be a significant failing of the plan.

As a result, it remains our view that the Council's proposed modifications (particularly relating to the delivery of sustainable development – as set out in the NPPF) remain nothing more than a 'light touch' and demonstrably fail to tackle the more fundamental sustainability issues in terms of delivering economic development/growth and investigating opportunities for additional housing capacity (and linking housing growth to economic growth). It remains our view that the Core Strategy cannot be considered sound and consistent with the NPPF until this additional work is completed.

**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).

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):

MM6
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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 evidencebase 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 insertion of the word “approximately” in front of the anticipated number of dwellings to be delivered at the strategic allocations in Upton, Wareham and Lytchett Matravers would suggest that there is an element of doubt over the number of units to be delivered by the future developments. In turn, this increases the uncertainty over the contribution the strategic site allocations will make in terms of meeting the projected housing targets (and emphasises the importance of identifying additional land/areas to accommodate housing growth).



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

MM7
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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 evidencebase 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)

As per our previous representations, we continue to strongly object to the continued identification of the Borough’s major strategic employment sites (Dorset Green Technology Park and Holton Heath) as land outside the settlement hierarchy and within the Countryside (and thereby assessed under Policy CO). It is evident that both employment sites are extensively developed brownfield sites, which have the capacity for additional growth/development and as a result, neither site can be considered to fulfil a ‘countryside’ role/function

Whilst Policy CO identifies both sites as ‘exceptions’ to the normal policy approach, the very inclusion of the employment sites within the countryside designation clearly implies a restrictive approach towards future development in these locations – which will create uncertainty for investors and funders.

**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).

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):

MM8
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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 evidencebase 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)

Proposed Modification MM8 inserts a new paragraph into the Plan (6.1.5). This acknowledges the potential shortfall in housing over the plan period and sets out that, in addition to annual monitoring, a cycle of more comprehensive monitoring and review of the Local Plan housing provision should be established with review dates in 2016 and 2021.

This proposed approach reflects that of the partial review established in MM2, and for the same reasons, we do not support such a mechanism. The Local Plan should only be adopted when it has a sound set of policies to guide the growth of the District over the plan period. The inclusion of a delayed partial review does not detract from this basic requirement for a sound plan; and the review mechanism proposed will not provide any certainty to guide growth, or assist in meeting housing needs in the interim.

The monitoring process set out in MM8 goes no further than the normal requirements for

gathering and assessing evidence to prepare a Local Plan (work which should have been completed prior to the submission of the Plan for Examination in Public) and is already a process that the Council should undertake regularly through the Annual Monitoring Report.

**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).

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):

MM14
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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 evidencebase 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 Main Modifications include frequent references to a ‘Heathlands Plan’ (included in modifications MM14, MM17, MM28 and MM35). It is unclear whether these are direct references to the Dorset Heathlands Interim Planning Framework SPD or the Dorset Heathlands joint DPD document. Either way, the proposed SANGS identified in the Core Strategy are not currently referenced in either the SPD or DPD documents (indeed the various documents appear out of step with each other and the Core Strategy). Hence, there does not appear to be a clear (or robust) policy mechanism for collecting/pooling contributions from developments to deliver these strategic SANGS proposals, including strategic SANGS or other potential mitigation measures.

We raised concerns at the recent Core Strategy EiP over the potential impact of ‘windfall’ housing development and the undefined ‘character area potential’ sites (which collectively will make up a significant proportion of new housing within Purbeck) on the Dorset Heaths and how these disperse cumulative impacts will be mitigated. The Main Modifications provide little

clarity on the intended approach towards delivering and funding area wide mitigation measures to off-set any impact of small-scale residential development.

Given the sensitivity associated with new development within Purbeck, it is critical that a robust mechanism for the delivery of the required mitigation measures is included within the Core Strategy.

**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).



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):

MM15
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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 evidencebase 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)

We note the Council’s intention to allocate a new employment site at Bere Regis “to provide for local opportunities”. The proposed modification is intended to address paragraph 21 of the NPPF which requires LPAs to “set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth”.

However, the absence of a clear economic vision/strategy from the Core Strategy (as a whole) means that it is entirely unclear why the Council has decided to allocate an employment site at Bere Regis (other than to relate to some small-scale housing growth); where the employment land will be located; how this site will assist in meeting Purbeck’s employment needs; whether this allocation reflects the current/projected demand/need for new employment floorspace in Purbeck; and whether the allocation is realistic, viable and deliverable.

Furthermore, due to the absence of a credible evidence base, it cannot be ascertained (with

certainty) whether the allocation of ad hoc (and undefined) employment sites will impact upon the District's existing employment land provision (including the Strategic Employment sites – such as DGTP). Fundamentally, there is no evidence base or up-to-date research (including an up-to-date employment land review) to underpin the Council's proposed approach towards the allocation and safeguarding of employment land. As a result, there continue to be significant doubts over the ability of the Core Strategy (incorporating the proposed Main Modifications) to deliver meaningful economic growth which builds on the current strategic employment sites.

As set out in our previous representations, the NPPF places significant weight upon securing economic growth in order to create jobs and prosperity (paragraph 18). However, it is entirely unclear how the Council can deliver meaningful and sustainable economic growth without an agreed economic strategy in place (prior to adoption of the Core Strategy), prioritising areas and locations for economic growth and having completed a thorough review of the quality and availability of land within the Borough's existing employment land supply. Furthermore, it is unclear how the Council can robustly identify economic priorities for the spatial areas in the absence of an overarching economic strategy for the Borough.

Without this key work, we do not consider the Core Strategy to be consistent with the requirements of the NPPF, in that:

- without a Borough-wide economic strategy actively guiding new employment growth/development to certain areas/locations we cannot see how the Council can positively and proactively encourage sustainable economic growth;
- there is no evidence that the Council has sought to link economic growth with housing growth – a core objective in achieving sustainable development. Indeed, it remains entirely unclear as to what extent the opportunity to accommodate employment growth in conjunction with housing growth has been explored and assessed through the preparation of the Core Strategy. As a result, the strategic housing sites identified within the Core Strategy do not appear to be well related or well linked to existing and proposed employment opportunities;
- as currently drafted, the Core Strategy policies fail to:
  - o identify those sites for local inward investment to meet anticipated need over the plan period;
  - o support existing business sectors – by identifying and planning for new and emerging sectors likely to locate in an area;
  - o plan positively for the location, promotion and expansion of clusters and networks of knowledge driven, creative or high technology industries;
  - o identify priority areas for economic regeneration, infrastructure improvement and environmental enhancement.

Finally, it is noted that the Council's primary reason for allocating additional employment land is to provide the opportunity to link new housing with employment growth. However, as set out in our previous representations, despite the clear recommendations from GoSW (in their letter of Nov 200), the Council has failed to actively explore this opportunity in relation to Purbeck's two existing (and commercially active) strategic employment sites.

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

MM16
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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 evidencebase 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)

We note that proposed Main Modification to the first paragraph of Policy SW refers to the delivery of “around” 133 affordable dwellings for local people. Again, this would imply some doubt over the actual number of affordable homes which may be provided within the area over the plan period. Given the acute need for affordable housing within the local area, Purbeck should be taking every opportunity to maximise the delivery of locally affordable accommodation.

As highlighted within our previous representations, the DGTP Masterplan has identified the opportunity to deliver a significant quantum of affordable housing which can be designed to specifically meet local housing needs. Furthermore, ZBV have offered to introduce specific marketing/sales initiatives to ensure that the new housing is available (in the first instance) to those who live and work in the Wool area – thereby delivering local homes specifically for the local community.



We would also bring it to the Council and Inspector's attention that ZBV (Winfrith) Ltd has continued (since the EiP) to work with Natural England to identify options for providing appropriate on-site mitigation (in the form of a SANGS) to support a mixed-use development (including a reduced residential component) at the DGTP site. Those discussions have identified the potential for reducing the scale and altering the phasing of the residential development to enable a significant on-site SANGS to be delivered which can meet Natural England's requirements.

The revised SANGS approach and amended DGTP Masterplan drawing are included as part of our submissions/representations to the proposed Main Modifications. These collectively demonstrate how a SANGS of 24.6 hectares can be provided on-site (on the land to the south of the access road), alongside an additional 4.6ha of heathland support areas (on-site) and potential for a further 21ha of off-site heathland support (on land also owned by ZBV (Winfrith) Ltd). Collectively, the proposed mitigation can support a residential development of 450 residential units – alongside the wider Masterplan objectives. This approach will be further supported by the proposed Strategic SANGS being promoted by the Council at Coombe Wood (to the north of Wool). The proposed approach has been identified by Natural England as the preferred option for bringing the DGTP site forward for redevelopment.

As set out in our evidence at the EiP, the provision of a mixed-use development at the DGTP site has potential to deliver economic growth alongside significant new housing (including affordable housing) – thereby making a substantial contribution towards addressing Purbeck's needs. Added to this, the proposed mixed-use approach, proximity to public transport and the inclusion on-site of a consented renewable energy plant, provides the opportunity to achieve a highly sustainable (zero carbon) development which will accord with a number of the objectives set out within the NPPF.

On the basis that there is now the opportunity for suitable on-site mitigation (in the form of a substantial on-site SANGS) to be provided in conjunction with a mixed-use development (with the support of Natural England moving forward), we would urge the Council and Inspector to consider the identification/allocation of the DGTP site as a Strategic Site within the Core Strategy to accommodate employment and housing growth.

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

MM17
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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 evidencebase 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)

We support the identification of Coombe Wood, North Wood and surrounding fields as a potential strategic SANGS. In our view, the allocation of the proposed Strategic SANGS (along with other on-site mitigation) will enable significantly higher levels of housing growth to be accommodated within the area (as per the recommendations of the ‘Implications of Additional Growth Scenarios for European Protected Sites – Sept 2010’ study).

As the Council will be aware, ZBV (Winfrith) Ltd are proposing the regeneration of the Dorset Green Technology Park via a comprehensive mixed-use development incorporating new residential and employment development. Extensive discussions have been held with Natural England (subsequent to the recent Core Strategy EiP) to agree opportunities for providing sufficient on-site heathland mitigation. Based on these discussions, the revised Masterplan includes a reduced residential component of c.450 units and an extended SANGS area of 28.4 hectares (all within ZBV’s landownership).

The opportunity to provide Strategic SANGS in tandem with the opportunity to bring forward sufficient on-site mitigation in tandem with the regeneration proposals for the DGTP site will enable significantly higher levels of housing growth to be achieved within the SW Purbeck area. As per our earlier representations, it remains our view that there is an urgent need to investigate the opportunity to accommodate additional housing growth (alongside new employment growth) within the SW area prior to the adoption of the Core Strategy in order to ensure the requirements of the NPPF are met.

A copy of the current DGTP Masterplan layout (with the reduced residential component) and SANGS Report is included with our representations.

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

MM19
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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 evidencebase 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)

We note that Policy CEN has been modified to refer the delivery of “around” 170 affordable dwellings for local people. Similarly, the proposed modification also refers to Worgret Road site (in Wareham delivering “approximately” 200 dwellings.

Again, this would imply some uncertainty over the actual number of new homes (particularly affordable housing) to be provided within the area (and Purbeck as a whole) over the plan period. Given the acute need for both market and affordable housing within the local area, Purbeck should be taking every opportunity to maximise housing growth.

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

MM21
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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 evidencebase 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 Main Modifications have introduced the requirement for ‘nitrate neutrality’ within a number of policies (including MM14, MM18, MM21, MM26, MM29, MM30, MM32, MM55 and MM56). However, there is currently no evidence base to support the intended approach and to confirm whether ‘nitrate neutrality’ can be achieved for the District (as a whole) and details of the mitigation measures likely to be required to ensure this objective can be met.

MM55 states that ‘a joint approach to ensure that new development is nitrogen neutral is underway (including an options appraisal and timetable of actions). It will cover the relevant local authority areas and will be essential to ensure that mitigation measures are coordinated and consistent, and to secure their delivery. The Council is working with West Dorset District Council, Borough of Poole, Environment Agency, Wessex Water and Natural England to develop a strategic mitigation/avoidance approach for Poole Harbour SPA and Ramsar in respect of nutrient (nitrogen) enrichment.’

Evidently, this is a critical piece of work which needs to inform the future approach towards new development within Purbeck. In the absence of this study it is difficult to assess whether the approach proposed is reasonable, appropriate or robust.

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

MM24
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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 evidencebase 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)

It is noted that Map 11 identifying the proposed settlement extension to Wareham has been significantly amended. The amended version includes a reduction in the size of the mixed-use allocation, the designation of protected playing fields, the deletion of one of the potential Heathland Mitigation Areas and the identification of an area expected to be the ‘focus for housing growth’.

In view of the changes to the allocation, it is now unclear exactly how many new homes will be delivered via the proposed settlement extension (and whether this will now fall short of the Council’s target for the site – in view of the reduced area); what mix of uses/development content will be included within the wider ‘mixed-use area’ (note: current policy is silent on this point); and whether the reduced Heathland Mitigation Area (which is some distance from the site) will be sufficient to mitigate the impact of all housing growth envisaged within Wareham (from the proposed settlement extension and character area potential sites).

Furthermore, it would appear that the area identified as the 'Expected Focus for Housing Development' is the least well related to the existing settlement (being a Greenfield site to the west of the protected playing fields). Consequently, this area (if brought forward as a first phase) could operate more as a satellite to the main settlement.

This suggests that the Council's approach towards the selection of strategic housing sites is not fully consistent with the objectives of the NPPF.

**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 large, empty rectangular box with a thin black border, intended for providing responses to the main modifications.

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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):

MM26
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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 evidencebase 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 Main Modifications have introduced the requirement for ‘nitrate neutrality’ within a number of policies (including MM14, MM18, MM21, MM26, MM29, MM30, MM32, MM55 and MM56). However, there is currently no evidence base to support the intended approach and to confirm whether ‘nitrate neutrality’ can be achieved for the District (as a whole) and details of the mitigation measures likely to be required to ensure this objective can be met.


MM55 states that ‘a joint approach to ensure that new development is nitrogen neutral is underway (including an options appraisal and timetable of actions). It will cover the relevant local authority areas and will be essential to ensure that mitigation measures are coordinated and consistent, and to secure their delivery. The Council is working with West Dorset District Council, Borough of Poole, Environment Agency, Wessex Water and Natural England to develop a strategic mitigation/avoidance approach for Poole Harbour SPA and Ramsar in respect of nutrient (nitrogen) enrichment.’

Evidently, this is a critical piece of work which needs to inform the future approach towards new development within Purbeck. In the absence of this study it is difficult to assess whether the approach proposed is reasonable, appropriate or robust.

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

MM31
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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 evidencebase 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)

Proposed modification MM31 would appear to suggest that suitable Heathland Mitigation measures are yet to be agreed in support of the proposed settlement extension to Lytchett Matravers at Huntick Road. The proposed modification suggests that if mitigation measures cannot be agreed, the proposed 2015 partial review of the Plan will review the allocation and if necessary allocate an alternative site.

Again this suggests that there is some uncertainty over the delivery of new housing via the proposed settlement extension at Lytchett Matravers, which could impact upon the Council's ability to meet their current housing targets.

We also note, the Policy HS targets the delivery of the 50 units at the Huntick Road site between 2013-2017. If it becomes necessary to review the allocation through the 2015 partial review, it is highly unlikely that this target will be met – thereby the short to medium term housing supply in doubt.

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

MM37
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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 evidencebase 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)

We note that Policy SE has been modified to refer to the delivery of "approximately" 200 dwellings via the proposed settlement extension on an unidentified site around Swanage.

Again, this implies some uncertainty over the actual number of new homes (particularly affordable housing) to be provided within the Swanage area (and Purbeck as a whole) over the plan period. Given the acute need for both market and affordable housing within the local area, Purbeck should be taking every opportunity to maximise housing growth.

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

MM38
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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 evidencebase 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)

As discussed at length at the recent EiP, there remains uncertainty over the opportunity to deliver 200 new residential dwellings via a settlement extension to Swanage. Whilst the Council has committed to the preparation of an Area Action Plan to investigate potential development options, it is apparent that there is significant local objection and a lack of clarity over the potential impact of new development upon the designated ANOB and European Protected sites.

Again, this implies some uncertainty over housing delivery (particularly affordable housing) within Purbeck over the plan period. Furthermore, it is difficult to understand why the Council has decided to allocate the provision of 200 new homes within Swanage without identifying an appropriate site and the required mitigation package – whereas a number of other development opportunities (on sites promoted by developers) have been discounted because of a perceived uncertainty over the proposed mitigation package.



**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).

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):

MM44
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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 evidencebase 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)

Proposed modification MM44 suggests that the NPPF “supports the re-use of rural buildings for housing where it would lead to an enhancement of the immediate setting”.

However, this would appear to be a miss-reading of paragraph 55 of the NPPF which states “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural economies. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances”. One special circumstance highlighted it “where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting”.

Hence, the conversion of rural buildings to housing should be treated as a special exception to policy – rather than a permitted change. Accordingly, MM44 should either be deleted or re-

written to properly reflect paragraph 55 of the NPPF.

**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).

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):

MM45
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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 evidencebase 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)

As per our previous representations, the continued identification of the Borough’s major strategic employment sites (Dorset Green Technology Park and Holton Heath) as falling within the Countryside (and thereby assessed under Policy CO) remains confused.

This is further confused by proposed modification MM45 which states that ‘Development in the countryside should aim to improve the sustainability of rural settlements’. Evidently any new development proposed at DGTP or Holton Heath will have far wider ranging benefits for Purbeck – and would not be designed (or of a scale) to only relate to the rural context. The proposed insertion of modification MM45 further underlines that the inclusion of the strategic employment sites under Policy CO is entirely inappropriate.

Whilst Policy CO identifies both sites as ‘exceptions’ to the normal policy approach, the very inclusion of the employment sites within the countryside designation clearly implies a restrictive

approach towards future development in these locations – which will create uncertainty for investors and funders.

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

MM46
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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 evidencebase 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)

As per our comments to MM44, proposed modification MM46 supports the re-use of rural buildings for housing where it would lead to an enhancement of the immediate setting.

However, this approach appears to be a miss-reading of paragraph 55 of the NPPF which states “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural economies. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances”. One special circumstance highlighted it “where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting”.

Hence, the conversion of rural buildings to housing should be treated as a special exception to Policy CO – rather than a supported change. Accordingly, MM46 should either be deleted or

re-written to properly reflect paragraph 55 of the NPPF.

**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).

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):

MM48
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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 evidencebase 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)

We note that proposed modification MM48 refers the preparation of a Housing Strategy. This is the first reference to a Housing Strategy within the Core Strategy and it is unclear what issues/matters will be reviewed and the timing for the preparation of the strategy. Furthermore, we are unclear why the Council has taken the decision to produce a Housing Strategy after the preparation/adoption of the Core Strategy (typically we would expect the Housing Strategy to inform the preparation of policy – rather than the other way round).

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

MM49
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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 evidencebase 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)

Proposed modification MM49 (to Policy RES) suggests that the scale/number of dwellings to be included within any development on a rural exceptions site should be commensurate with the “settlement hierarchy set out in Policy LD”. However, neither Policy RES nor Policy LD provide any indication/guidance on the scale of development on rural exception sites which may be considered ‘commensurate’ (i.e. will it be derived as a function of settlement size, level of services/facilities available, scale of housing growth envisaged by Policy HS etc). For instance, the Core Strategy is only supporting very limited additional housing growth in Wool, despite the settlement being identified as a Key Service Village (and within the second tier of the settlement hierarchy).

Given that the Council appears to be relying on the rural exception sites to deliver a high proportion of affordable housing, further clarification is required on the scale of development likely to be considered commensurate.

**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).



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):

MM50
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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 evidencebase 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)

Proposed modification MM50 refers again to the preparation of a Housing Strategy. As per our earlier representations, these are the first references to the preparation of a Housing Strategy and it is unclear what issues/matters will be reviewed and the timing for the preparation of the strategy. Furthermore, it is unclear why the Council has taken the decision to produce a Housing Strategy after the preparation/adoption of the Core Strategy (typically we would expect the Housing Strategy to inform the preparation of policy – rather than the other way round).

Furthermore, whilst the proposed modification reflects paragraph 54 of the NPPF, it would be beneficial to provide some guidance on what would constitute “significant additional affordable housing” for the purposes of the policy. As currently drafted, the modification lacks clarification and will therefore be open to subjective interpretation. Again, given the overriding need for affordable housing within Purbeck, a clearly defined approach should be set out within policy.

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

MM55
------

*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 evidencebase 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 Main Modifications have introduced the requirement for ‘nitrate neutrality’ within a number of policies (including MM14, MM18, MM21, MM26, MM29, MM30, MM32, MM55 and MM56). However, there is currently no evidence base to support the intended approach and to confirm whether ‘nitrate neutrality’ can be achieved for the District (as a whole) and details of the mitigation measures likely to be required to ensure this objective can be met.

MM55 states that ‘a joint approach to ensure that new development is nitrogen neutral is underway (including an options appraisal and timetable of actions). It will cover the relevant local authority areas and will be essential to ensure that mitigation measures are coordinated and consistent, and to secure their delivery. The Council is working with West Dorset District Council, Borough of Poole, Environment Agency, Wessex Water and Natural England to develop a strategic mitigation/avoidance approach for Poole Harbour SPA and Ramsar in respect of nutrient (nitrogen) enrichment.’

Evidently, this is a critical piece of work which needs to inform the future approach towards new development within Purbeck. In the absence of this study it is difficult to assess whether the approach proposed is reasonable, appropriate or robust.

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

MM56
------

*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 evidencebase 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)

Proposed modification MM56 refers to the Council’s intention to provide applicants will details on the mitigation to be required to ensure that new development is nitrogen neutral. However, no clarification is provided on the timing for release of this information from the Council/Natural England, those mitigation measures likely to be required or the mechanism for obtaining contributions towards any combined solution.

As noted within our earlier representations, Purbeck is reliant upon a number of smaller sites (i.e. character area potential and/or windfall) to deliver new housing within the District. It is assumed that the majority of these smaller sites will be within the existing urban area and are unlikely to be of sufficient size to deliver on-site mitigation to ensure the development is ‘nitrogen neutral’.


It would appear vital to have a clear understanding of the potential impact upon nitrogen



loading of the proposed housing supply (particularly from the significant number of smaller unallocated sites) and the required mitigation measures – prior to the adoption of the plan. It also appears that the redevelopment of larger/strategic sites to deliver new housing provides a greater range of opportunities for providing on-site or substantial off-site mitigation options.

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

MM59
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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 evidencebase 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)

We note that proposed modification MM59 (Policy RP) replicates paragraph 26 of the NPPF. However, the current drafting of the proposed modification would mean that proposals for new office development within the strategic employment sites (i.e. DGTP and Holton Heath) which continue to be located outside the current settlement hierarchy/town centres could be required to complete an impact assessment (despite the development taking place within an established strategic employment location).

Accordingly, it should be made clear that the provision of new B1 floorspace within the existing strategic employment sites will be supported and not required to complete an impact assessment.

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

MM63-65
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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 evidencebase 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 modifications (MM63, 64 and 65) to Policy D do not, in our view, go far enough in reflecting the requirements of Section 7 of the NPPF – which states that planning policies should ensure that developments: function well and add to the quality of the area; establish a strong sense of place; optimise the potential of sites to accommodate development (including creating and sustaining an appropriate mix of uses, support facilities and transport networks); respond to local character and history, whilst not preventing or discouraging appropriate innovation; create safe and accessible environments; and are visually attractive as a result of good architecture.

Added to this, paragraph 63 makes it clear that in determining applications, “great weight should be given to outstanding or innovative design”. Again, this requirement should be incorporated into Policy D.

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

MM64
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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 evidencebase 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)

Proposed modification MM64 amends Policy D (Design) by making reference to reflecting good practice advice, 'including appropriate densities' contained in District design guidance and townscape character assessments. We acknowledge the purpose of this modification to clarify the appropriate densities of residential development as the NPPF requires at paragraph 47. Nevertheless, we remain concerned that the actual density ranges should be contained within the policy itself in order to provide clarity and to ease the reader in understanding what densities are appropriate in which circumstances and in various locations. This approach is critical in understanding the assessment of future housing contribution that could be secured from sites in different locations across Purbeck.

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

MM73
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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 evidencebase 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)

We have a number of comments on the proposed Monitoring Framework (Appendix 3) set out in Annex 1 – these are as follows:

- reference is made within the triggers/indicators table to a partial review of the housing strategy. However, it is continues to be unclear (from reading the Core Strategy and LDS) which issues/topics will be covered by the housing strategy – and the timing for the preparation of the document;
- we have already made comments in relation to the timing of the proposed partial review – please see our representations to MM2;
- it is unclear how the Council will actually determine whether housing, retail and employment targets are going to be achieved. Similarly, it is also unclear at the point at which a review could be triggered. Furthermore, we would also recommend that the target (for review) be moved forward from 2027 to a much earlier date (i.e. 2015), thereby allowing the

sufficient time to amend the policy approach (if necessary) to achieve the required targets;

- clarification should be provided on the timing/extent for surveying/assessing the effectiveness of planned mitigation for the European protected sites;
- clarification should be provided on the timing (and extent of) the review/monitoring of serviced employment land. Clarity should also be provided on the trigger point for a review of the policy. Furthermore, it is unclear whether 'available and serviced land' refers to simply the availability of land or the availability of developed land with serviced buildings;
- in our view, a further indicator reviewing the balance between employment and housing growth should also be included. Both elements are key components in delivering sustainable development and should be jointly managed;
- we note that the Council is committing to reviewing the plan/strategy where there has been a significant change in national policy. The Council has already admitted within their NPPF Statement that it has not been possible to modify the plan to meet all the requirements of the NPPF – as a consequence this trigger has already been hit. This is a particular concern given the transitional arrangements set out within Annex 1 of the NPPF which only provides 12 months (up to March 2013) to bring policy up to-date;
- the Council has not included any indicator/target to measure employment growth at DGTP (a strategic employment site) – this in our view is a key omission;
- in relation to the monitoring targets included for Policy ELS (Employment Land Supply) – it would be far more appropriate to include targets related to job creation (and job types). The use of land area (which could be simply constitute vacant land set aside for development – rather than available, developed/serviced land) is not an appropriate indicator (on its own) of genuine economic growth;
- incorporating a 'no significant loss on safeguarded employment sites by 2027' is inconsistent with the Council's intention to review all employment sites/employment land supply via an employment land review/site allocations plan (which could recommend a reduction in safeguarded land). This indicator should therefore be deleted.

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

MM80
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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 evidencebase 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 introduction of Appendix 5 – SANGS Guidance is welcomed as it provides further information on the requirements for SANGS.

However, we continue to be concerned that there is still much uncertainty within the Core Strategy over the delivery of mitigation for impacts on the designated Dorset Heaths including the use of SANGS. In particular, at the recent we raised concerns over the impacts of windfall and character area potential sites on the Dorset Heaths and how these disperse cumulative impacts could be mitigated. It continues to be unclear how or if this has been addressed in the revised Core Strategy.

The concept of ‘Strategic SANGS’ has been introduced into the Core Strategy, which is considered to be beneficial. However there is no explanation or definition of the role of these ‘Strategic SANGS’ or clarification on how they will be delivered (or the timing for this delivery).

Furthermore, the role of 'Strategic SANGS' compared to 'site specific SANGS' is uncertain, in terms of the scale of mitigation likely to be offered by Strategic SANGS (i.e. will they off-set the need for on-site mitigation), the delivery mechanism and the future approach to on-going monitoring and management.

We also remain of the view that there is still an over reliance on the preparation of subsequent plans (including the Joint Dorset Heaths DPD) to provide the delivery mechanism for mitigating impact upon the protected European Sites in Purbeck. Given the pertinence of the issue in terms of housing growth, these plans should have been prepared in advance of the Core Strategy and lead the formulation of local policy.

**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).

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)

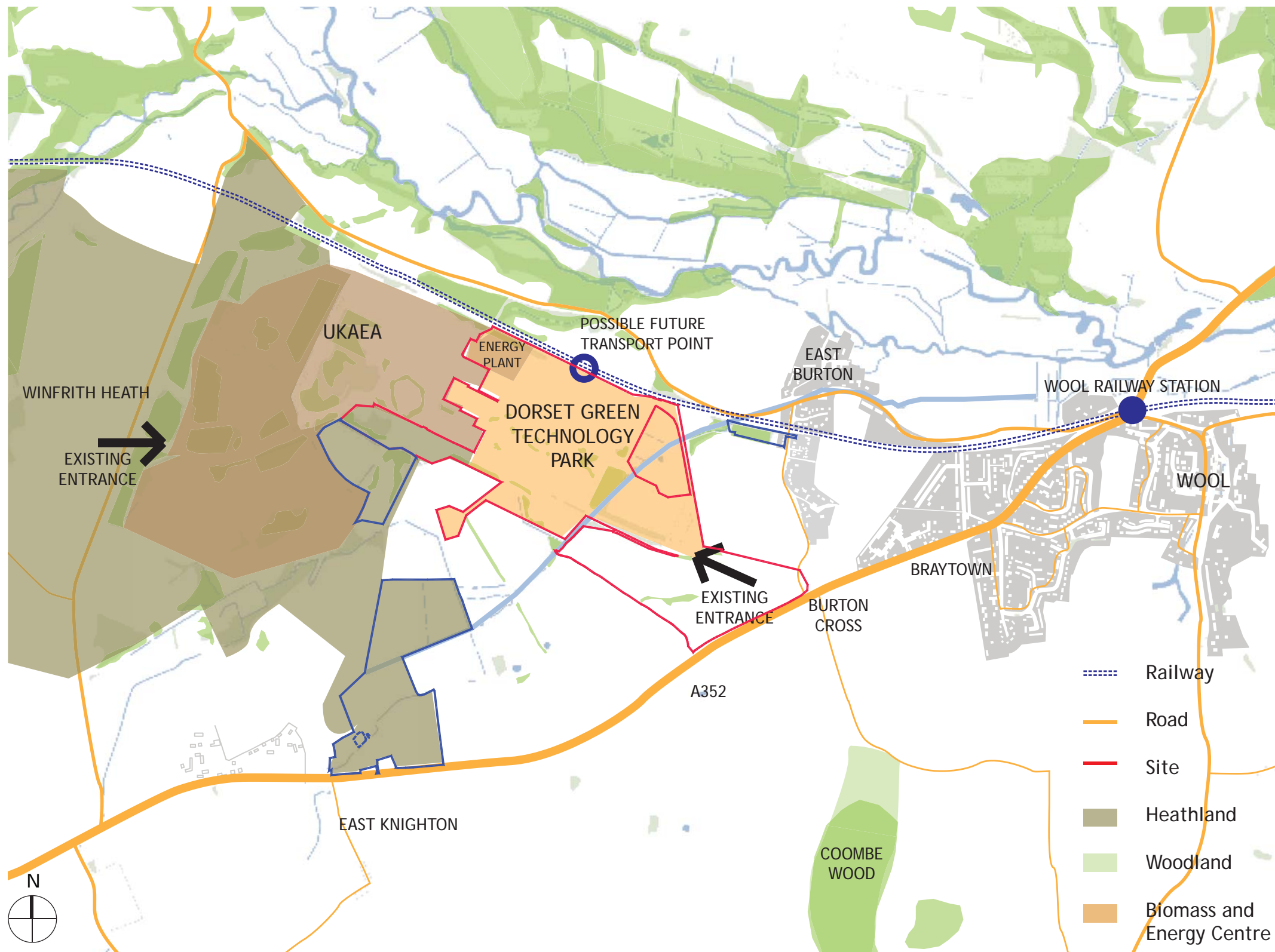


# Dorset Green SANGS Report

July 2012

- 1.0 Introduction
  - 1.1 Accessible Green Spaces
  - 1.2 Housing Layout
  
- 2.0 SANGS Objectives
  - 2.1 Landscape Proposals
  - 2.2 Fenced Heathland Support Area
  - 2.3 Ecology Park
  - 2.4 Country Heritage Park
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  - 2.6 Green Corridors
  - 2.7 ANGST Standards
  
- 3.0 Circular Walks
  - 3.1 Circular Walk Landscape
  - 3.2 Signage & Wayfinding
  
- 4.0 Design Development
  
- 5.0 SANGS Checklist
  - 5.1 SANGS Management
  
- 6.0 Dorset Green - Green Infrastructure
  - 6.1 Dorset Green SANGS

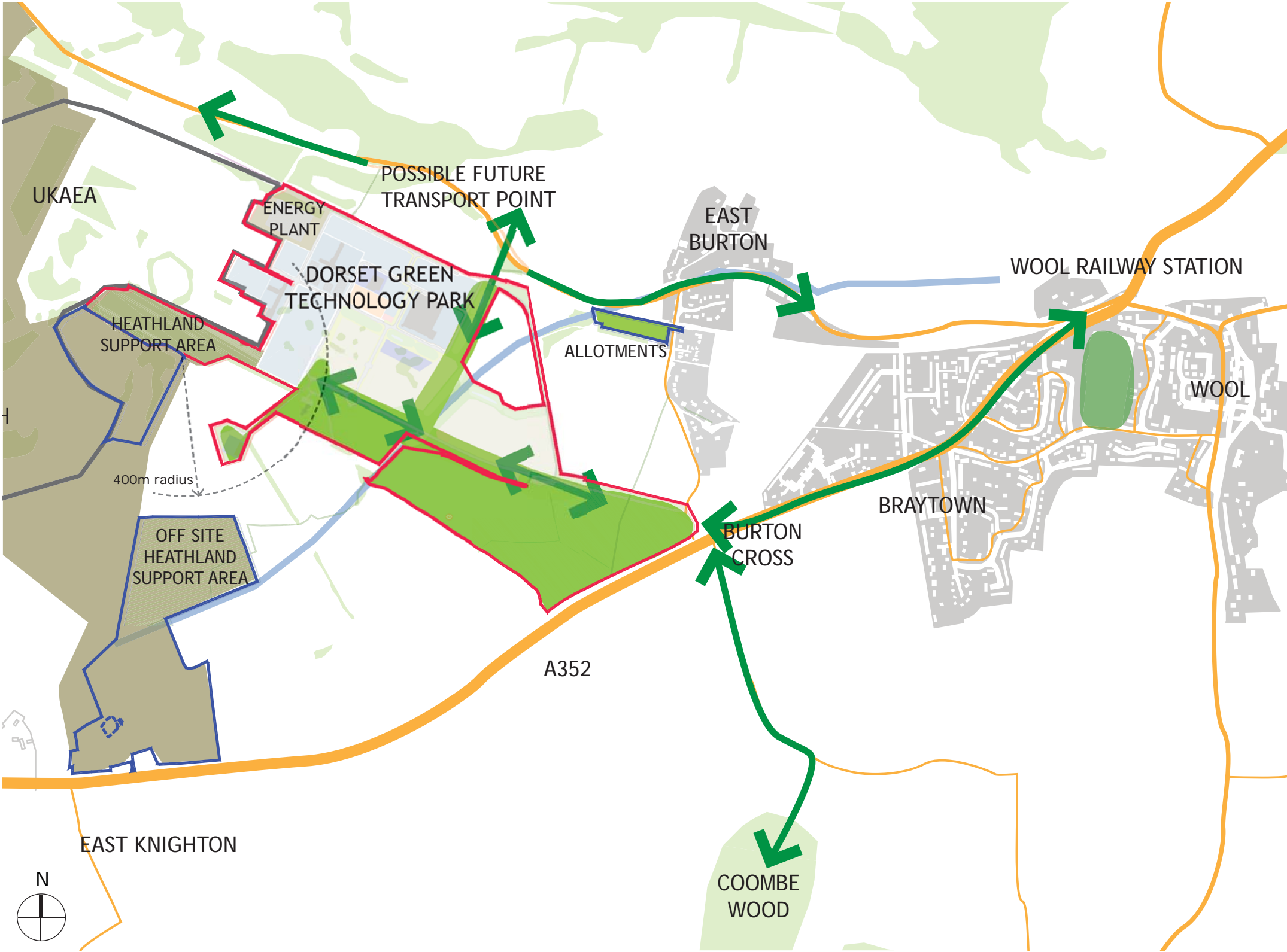
# Introduction 1.0



- Mixed use development providing 450 residential units
- Site previously employed 4000 as UKAEA and now employs 1000
- Site needs investment to secure future and potential for transition
- Consented biomass plant is located on site enabling low carbon heat and power to be provided to the site

• The 51ha DGTP site is one of the largest **brownfield** sites in Purbeck

# Accessible Green Spaces 1.1



Improve the amount and quality and of publicly accessible green spaces.

Provide a Suitable Alternative Natural Green Spaces (SANGS) to mitigate any potential impacts on designated Dorset Heaths.

Create new recreation sports pitches and spaces for the needs of the new development.

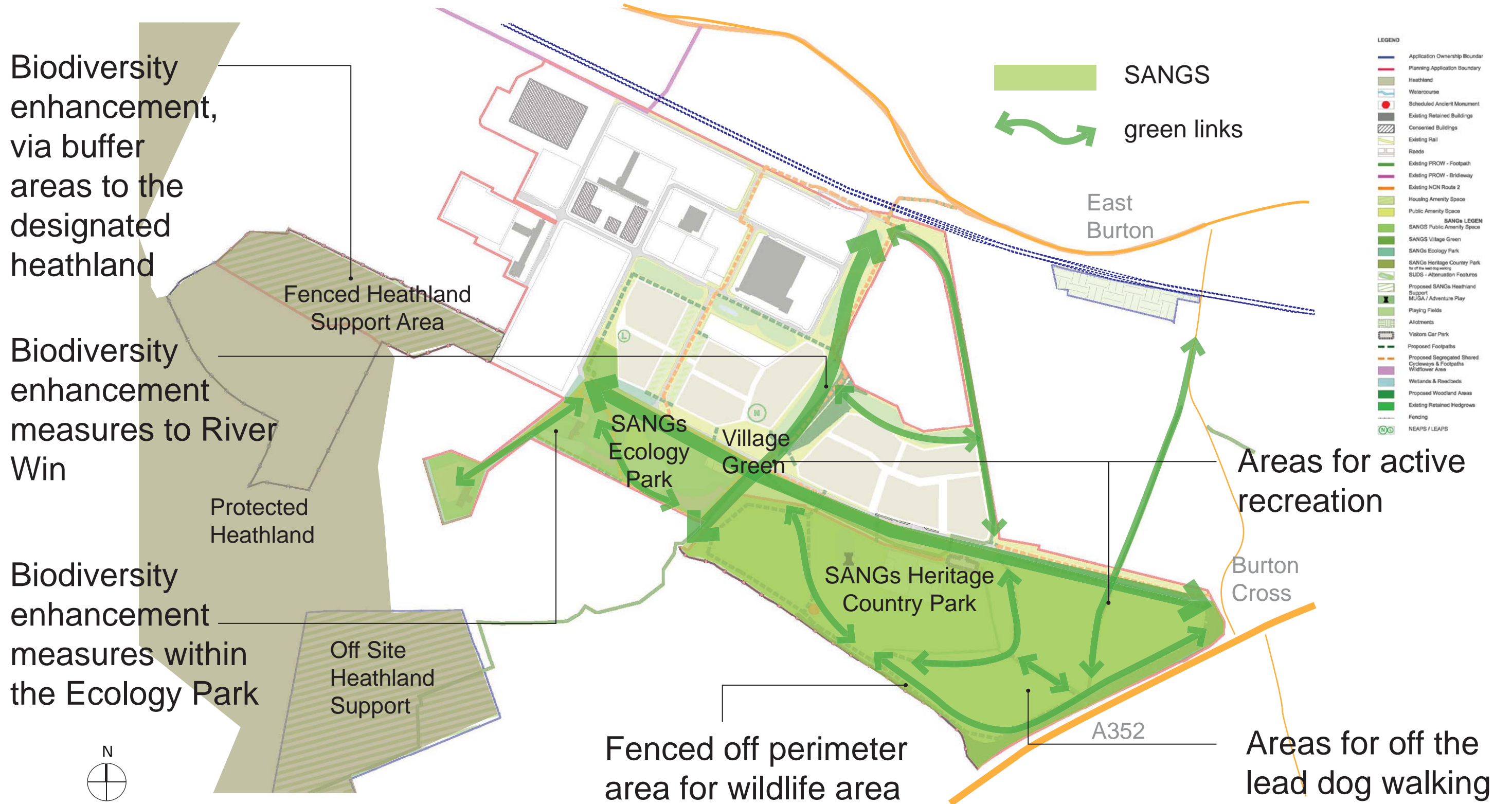
# Housing Layout 1.2

Provision of 450 residential units with residential plots located beyond 400m of the heathland.



# SANGS Objectives 2.0

A SANGS will be provided to mitigate the impact of development within 5km of the protected heaths



# Landscape Proposals 2.1

## LANDSCAPE Provision within Site

# 24.6 ha

### Fenced Heathland Support Area

- Wetlands
- Heathland re-creation
- Reedbeds
- Ponds
- Wildflower areas

### Ecology Park

- Ponds
- Reedbeds
- Wildflower areas

### Village Green

- Enhanced water course of the River Win
- Picnic Area
- Trim Trail
- Woodland enhancements

### Heritage Country Park

- Dog activity area
- MUGA with sheltered area
- Playing Fields
- Adventure play area
- Acid grassland area
- Fenced off long tussocky grass area for wildlife

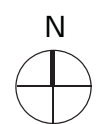
### Car Park

### Green Corridors & Links



EXCEEDING NATURAL ENGLAND GUIDANCE OF  
**16 ha / 1000 population**

SANGS PROVIDES  
**22.78 ha / 1000 population**  
 + 4.6 ha On Site Fenced Heathland Support  
 + 21.0 ha Off Site Heathland Support





# Fenced Heathland Support Area 2.2

## Heathland Creation & Ecological Support



Natural Habitats



Existing heathland

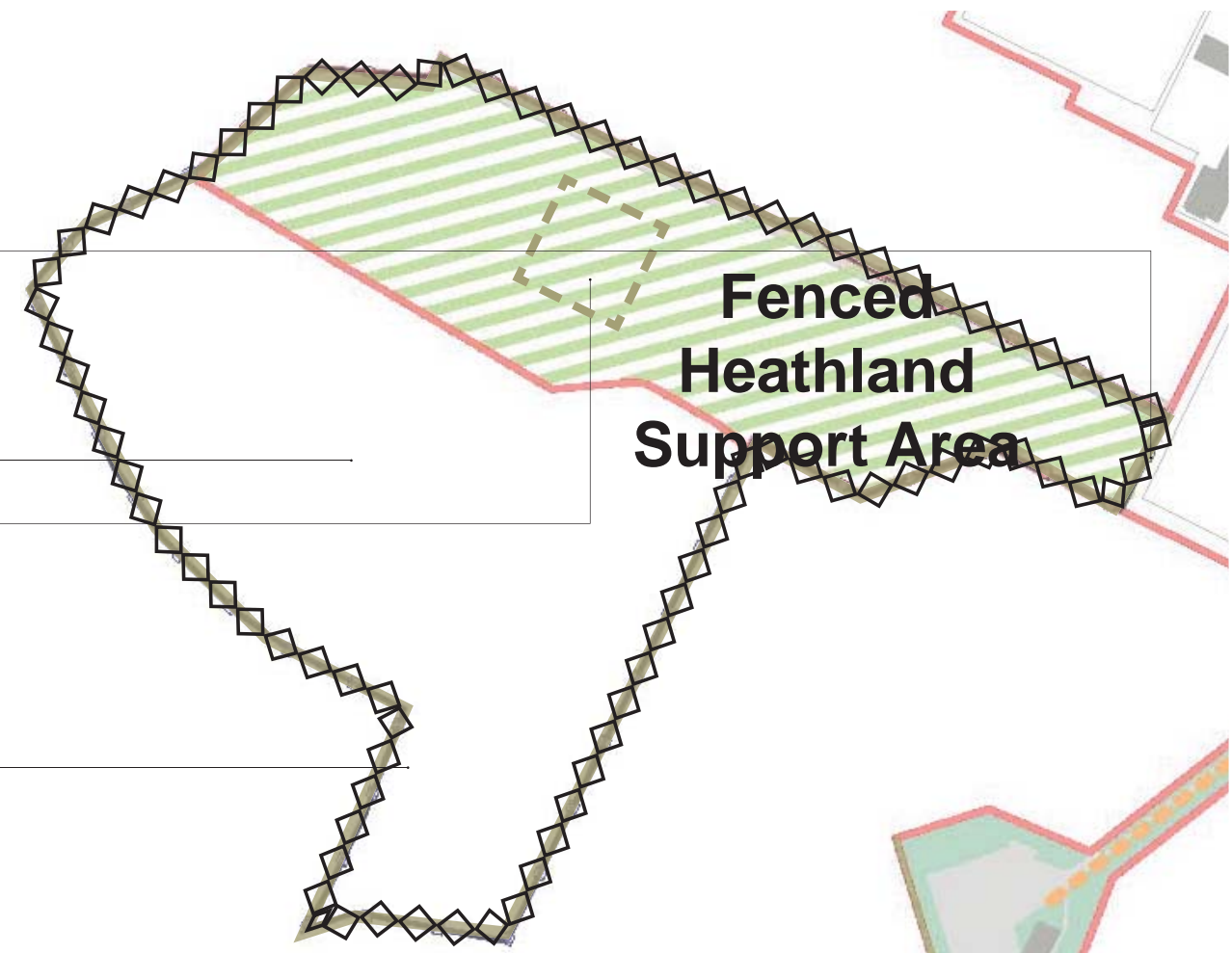


Existing fence to be retained around heathland



Existing building retained for bat roost

- fence and gate to UKAEA
- fenced heathland support area
- retention of existing roost / purpose built bat house
- existing heathland within fenced area



# SANGs Ecology Park 2.3



Ponds for wildlife



Reedbeds



Natural Habitats



Birdhide



Walkways



Enhancing the existing building with green walls and roofs



Existing building  
Visitor Centre



Allotments

- allotments
- reedbeds
- fence and gate to UKAEA
- ponds for wildlife
- wildflower areas
- bouldering / climbing centre
- birdhide
- Visitor Centre for Ecology / Jurassic Coast / Green Energy



# SANGs Heritage Country Park 2.4



Fitness



Dog Walking



Community Sport Facilities



Playgrounds

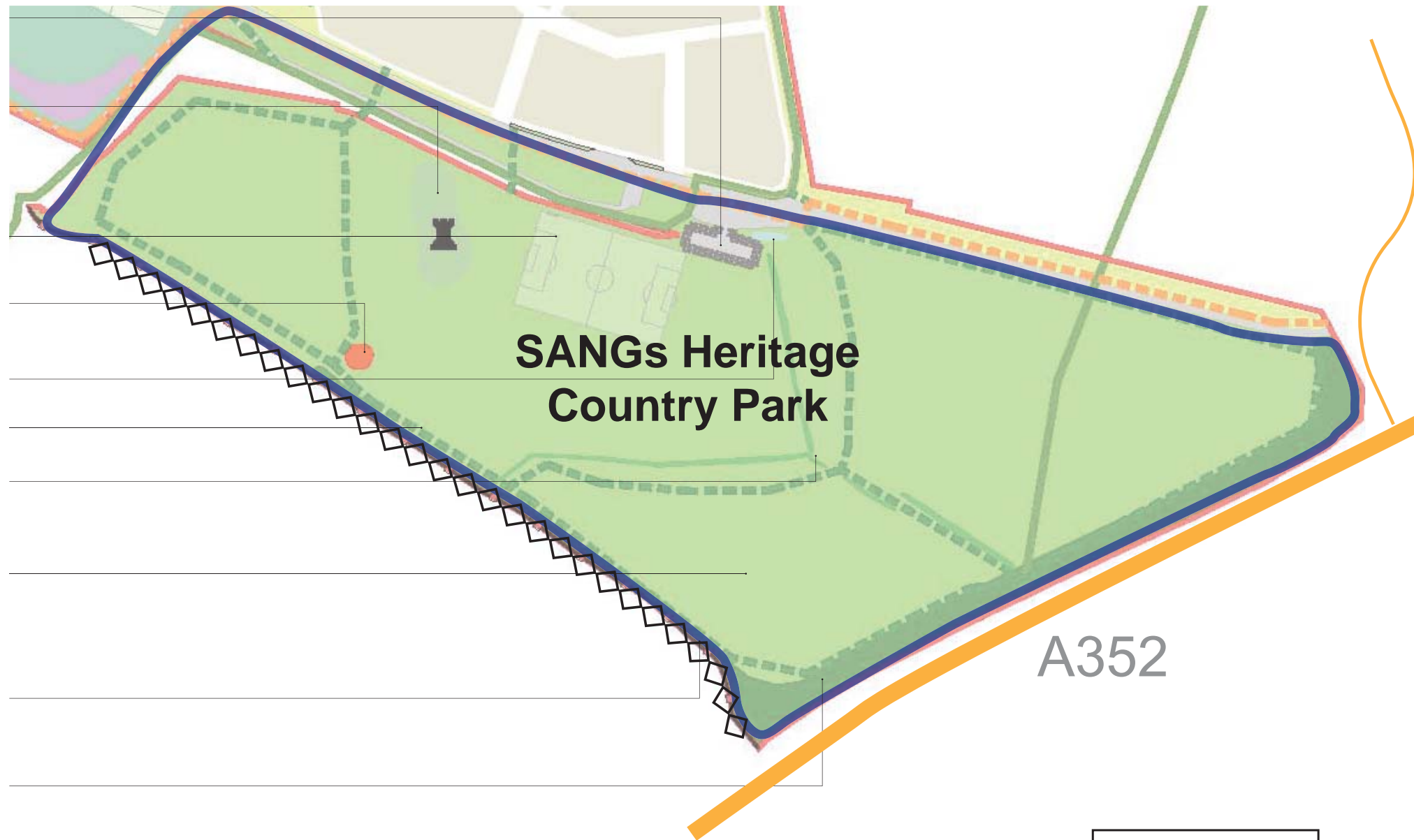


Foot paths



Open space for walking

- car park (with 30 car capacity)
- MUGA & adventure playground with sheltered area
- playing fields / football pitch
- scheduled ancient monument
- dog gym with dog bath
- dog walking route
- hedgerow connections & tree planting
- open grassland area with footpaths & off the lead area
- fenced off perimeter area for wildlife
- buffer treatment to A352 - mounds & planting



# Village Green 2.5



Village Green



Picnic Area



Cycle Routes



Enhanced planting along River Win & ecological enhancements



Attenuation Features



Village Green

segregated shared cycleways and footpaths

enhanced planting along River Win & ecological re-profiling of the banks of the River Win

picnic area

trim trail stations x 4

green links



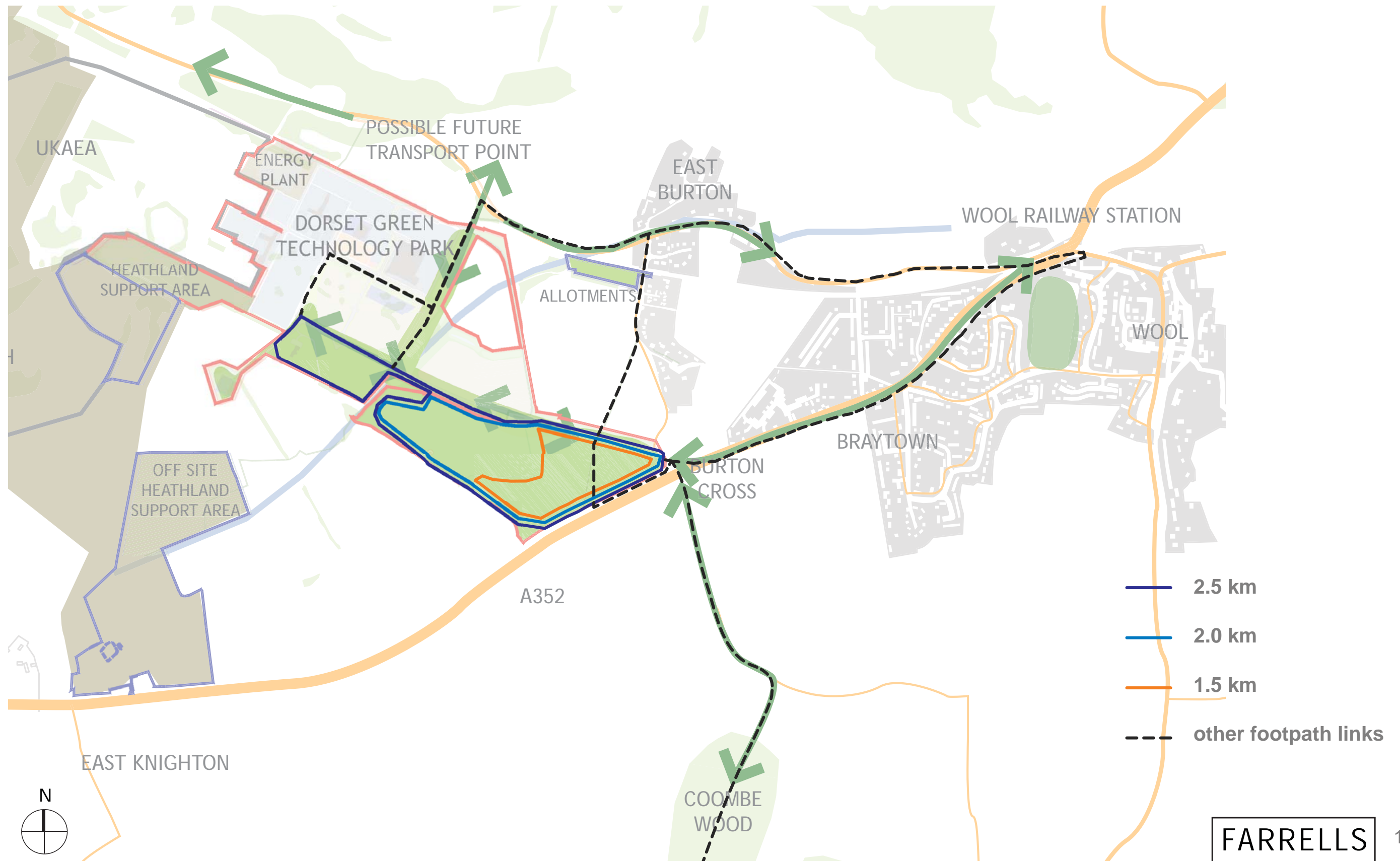
# ANGST Standards 2.7

A minimum area of 2 ha of the SANGS will accord with ANGST Standards with no more than a 300m walking distance from all residential units



# Circular Walks 3.0

Circular walks will start and finish at the car park navigating through areas of woodland, scrub, grassland, heathland and wetland

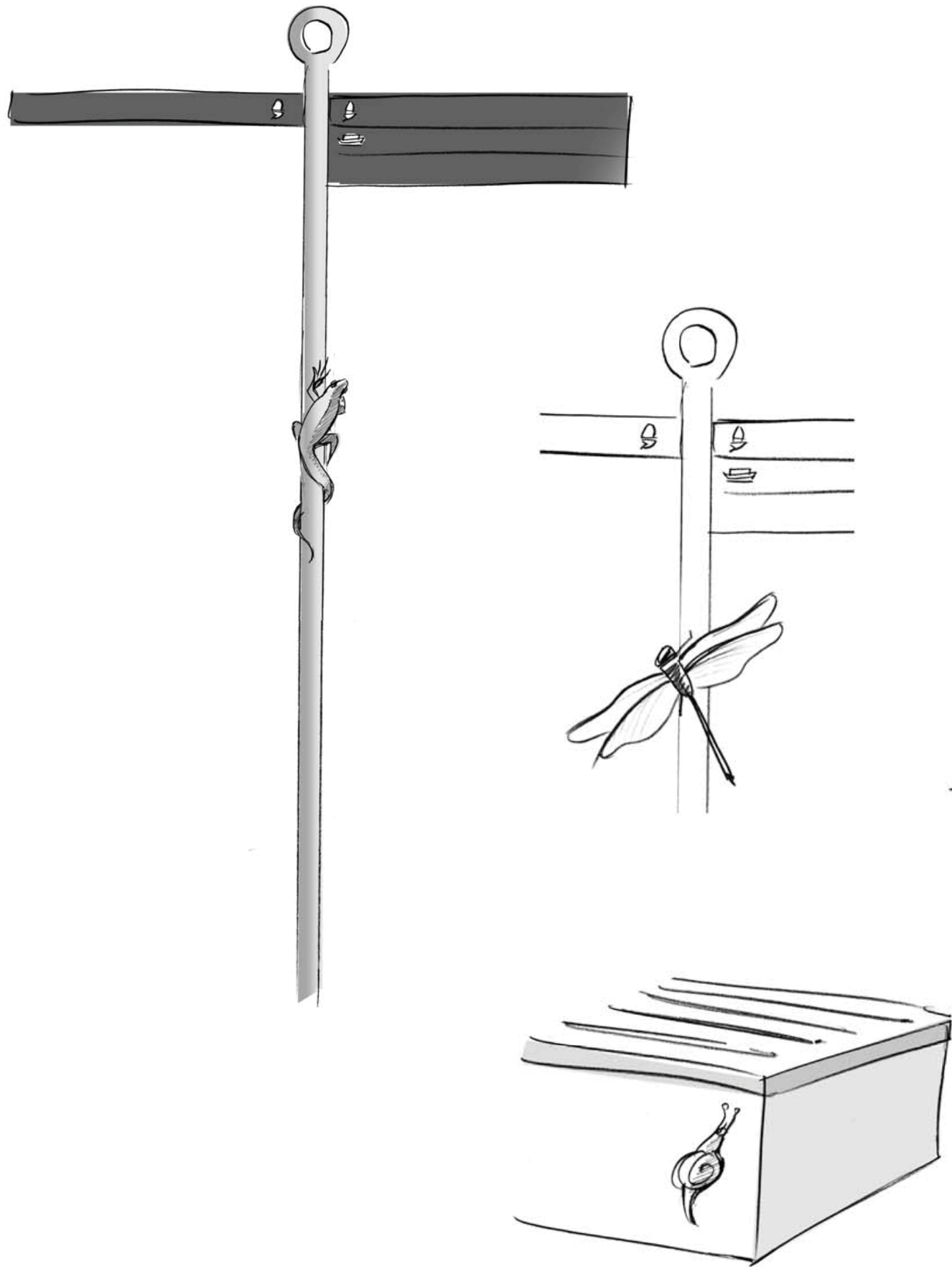


# Circular Walk Landscape 3.1

The 2.5 km circular walk will experience woodland, scrub, grassland, heathland and wetland



# Signage & Wayfinding 3.2



- possible positions for wayfinding & signage



The SANGS would be supported by signage and wayfinders to ensure easy access and navigation. Information boards will be present within the SANGS to aid appreciation and education on ecology and biodiversity within the site.

Elements that could be used for Signage and Wayfinding



**OPTION 1**

*SANGS Detached from Main Development*

**21 ha**

- provides one consolidated area for active recreation
- next to heathland potentially disturbing the wildlife
- insufficient area for active recreation
- encourages use of public right of way leading to the designated heathland

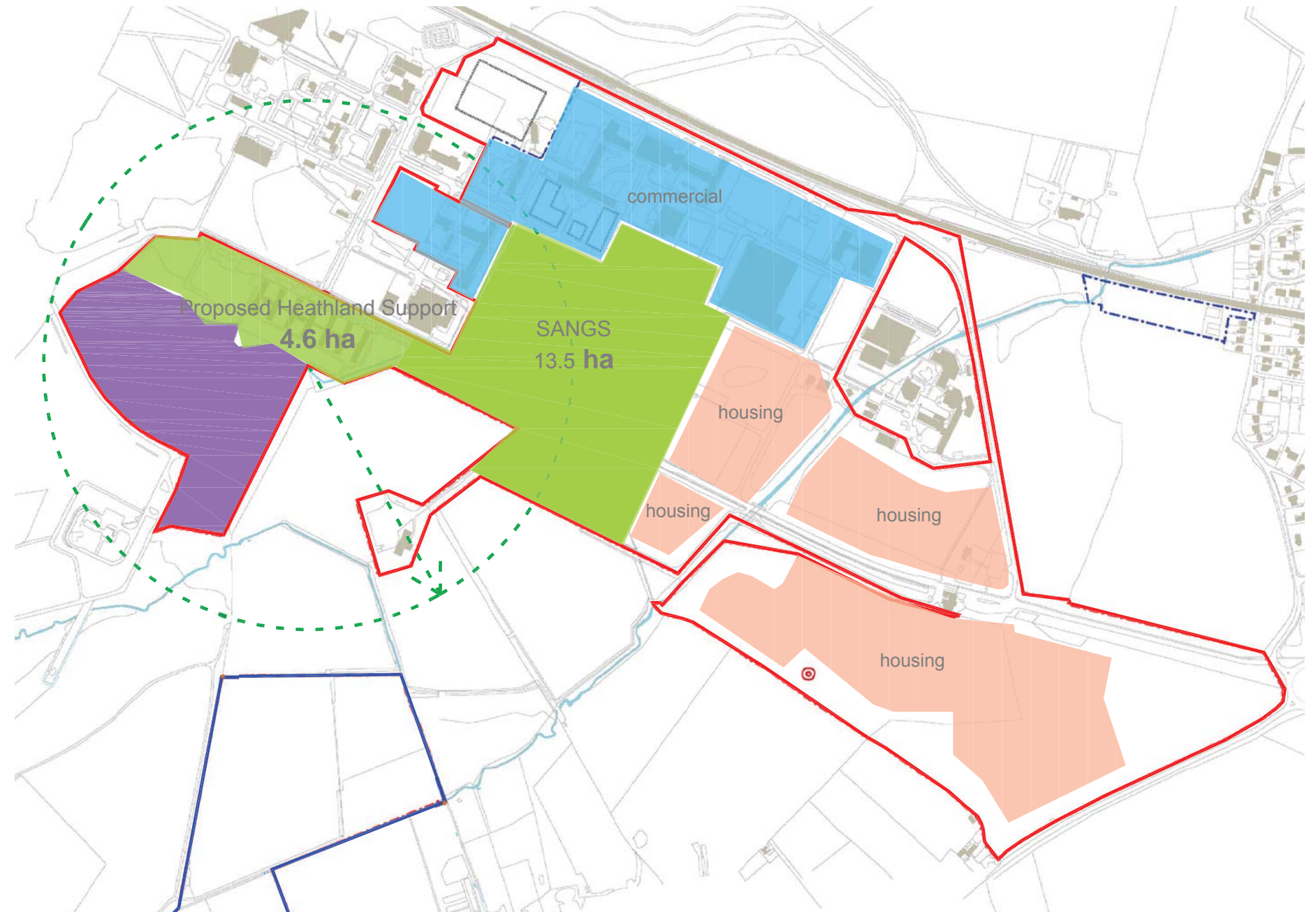


## OPTION 2

*Integration of one SANGS area within the Development*

# 18.1 ha

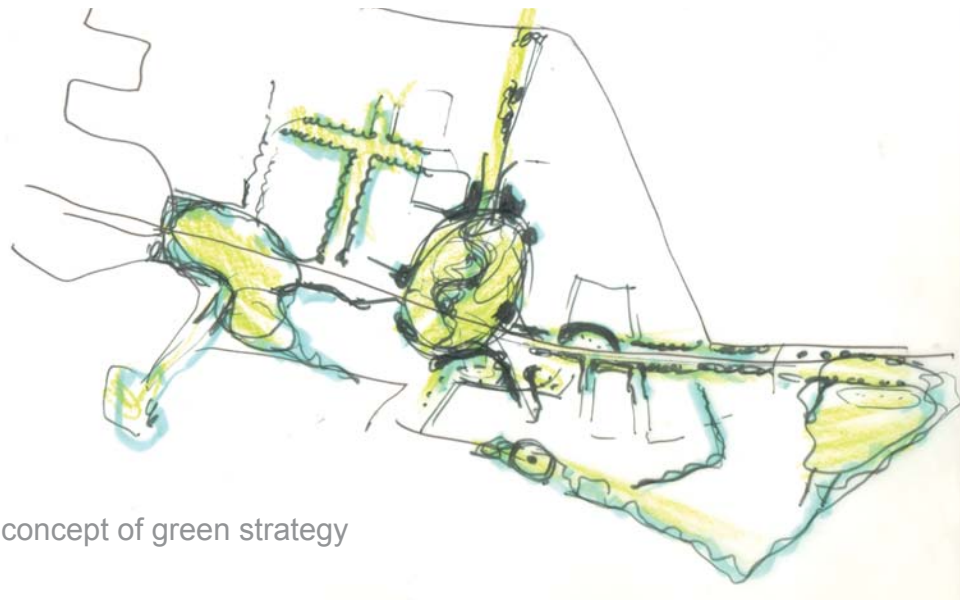
- one large area of SANGS
- area of SANGS is adjacent to protected heathland
- area of usable SANGS is too small to meet NE guidance
- housing and commercial are segregated



## OPTION 3

*Integration of SANGS within the Development*

**26 ha**



concept of green strategy

- large active village green where main active recreation is located
- area for biodiversity enhancement close to the designated heathland
- proposed heathland support
- SANGS is divided into 3 areas with no significant difference in size



## OPTION 4

*Integration of SANGS within the Development with one large Heritage Country Park*

# 28.4 ha

+ 21.0 ha off site heathland support  
+ 6.7 ha existing heathland

- largest area for active recreation in the east of the site allows easy accessibility to surrounding areas
- increased SANGS
- housing density increased to provide greater SANGS area
- area of Heritage Country Park has increased as a result of consultation with Natural England, Dorset Wildlife Trust and RSPB



## OPTION 5

*Integration of SANGS within the Development with one large Heritage Country Park*

# 24.6 ha










+ 4.6 ha on site heathland support  
+ 21.0 ha off site heathland support  
+ 5.2 ha green corridors & village green








- largest area for active recreation in the south east of the site allows easy accessibility to neighboring areas
- increased SANGS
- housing numbers decreased to provide greater SANGS area
- area of Heritage Country Park has increased as a result of consultation with Natural England, Dorset Wildlife Trust and RSPB



## Natural England SANGs Criteria

Requirement	Criteria	Description and Location within SANGs	
<b>Must Have:</b>	<ul style="list-style-type: none"> <li>SANGs should be able to offer the features described below without their functionality being compromised by unsuitable size, shape, location, topography or other inherent characteristics.</li> <li>SANGs required for developments in excess of 50 dwellings or 80 flats. Area required is between 8ha per 1000 residents and 16ha per 1000 residents, with a minimum of 2ha which accords with ANGST standards.</li> </ul>	<p>The Development incorporates 24.6ha of SANGs allocation that is incorporated around the residential area of the Development. This equates to 22.8ha of SANGs provision per 1,000 residents. In addition, a further 4.6ha of Heathland Support is provided on site and 21ha of Heathland Support is provided in the southern land holdings. The close proximity of the SANGs to the residential area of the Site minimises travel distance for the residents, and therefore maximises the potential for residents to use the SANGs opposed to the designated heathland.</p> <p>The shape and topography of the SANGs is well suited to achieve the other criteria outlined by NE.</p>	
	<ul style="list-style-type: none"> <li>There must be adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the Site and arriving by car.</li> </ul>	<p>The SANGs is intended for mitigation for the Development only. The SANGs allocation is located in close proximity (i.e. within 400m) of the residential areas of the Site, so is within easy walking distance for the residents of the Site. However, the Heritage Country Park includes a car park to ensure accessibility for the less abled residents and for visitors to the Site who come to use the playing fields.</p>	
	<ul style="list-style-type: none"> <li>If the site is intended for local pedestrian use only, then there must be excellent access for people arriving by foot, with a range of access points directly linking housing and the SANGs.</li> </ul>	<p>As above, the three character areas of the SANGs allocation are all in close proximity to the residential areas of the Site, with several access points and interconnecting cycle and pedestrian routes.</p>	
	<ul style="list-style-type: none"> <li>All SANGs with car parks must have a circular walk which starts and finishes at the car park.</li> </ul>	<p>The Heritage Country Park includes multiple circular routes that begin and end at the car park.</p>	
	<ul style="list-style-type: none"> <li>It should be possible to complete a circular walk of 2.3-2.5km around the SANGs, and for larger SANGs a variety of circular walks.</li> </ul>	<p>The Heritage Country Park includes a range of circular routes that range from approximately 1.5km to 7.5km. These include the Heritage Walk, Village Walk and The Grand Walk. An adequate level of benches would be provided.</p>	
	<ul style="list-style-type: none"> <li>Car parks must be easily and safely accessible by car and should be clearly sign-posted.</li> </ul>	<p>The car park for the Heritage Country Park is located just off the main access road to the Site so is easily accessible for residents of the neighbouring settlements and residents of the proposed Development. The SANGs would be supported by signage and wayfinders to ensure easy access and navigation.</p>	
	<ul style="list-style-type: none"> <li>The accessibility of the site must include access points appropriate for the particular visitor use the SANGs is intended to cater for.</li> </ul>	<p>As identified above, the site is accessible on foot and cycle for residents of the Development and the provision of a car park would ensure less abled residents can access the Heritage Country Park (and would also be accessible from neighbouring settlements and visitors who use the Playing Fields).</p>	

Requirement	Criteria	Description and Location within SANGs	
	<ul style="list-style-type: none"> <li>• Access points should have signage outlining the layout of the SANGs and the routes available to visitors.</li> </ul>	<p>The SANGs would be supported by signage and wayfinders to ensure easy access and navigation as well as information boards regarding the ecology of the SANGs to aid appreciation and education.</p>	
	<ul style="list-style-type: none"> <li>• The SANGs must have a safe route of access on foot from the nearest car park and/or footpath/s.</li> </ul>	<p>As identified above, the range of circular routes within the Heritage Country Park begin from the car park, and have safe and appropriate access points throughout. In addition, the SANGs connect to 2 existing Public Right of Ways (PRoW) and do not encourage walking through the designated heathland.</p>	
	<ul style="list-style-type: none"> <li>• SANGS must be designed so that they are perceived to be safe by users; they must not have trees and scrub covering all parts of the walking routes.</li> </ul>	<p>Tree and scrub cover will only partially cover the circular routes within the Heritage Country Park, with many paths proposed through the open fields.</p>	
	<ul style="list-style-type: none"> <li>• Paths must be easily used and well maintained but most should for the most part remain un-surfaced to avoid the site becoming too urban in feel. A majority of paths should be suitable for use in all weathers</li> </ul>	<p>Paths throughout the SANGs will be easy to use and well maintained. The paths in the Heritage Country Park will be un-surfaced to avoid the SANGs becoming too urban in feel.</p>	
	<ul style="list-style-type: none"> <li>• SANGs must be perceived as semi-natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.</li> </ul>	<p>Paths will be un-surfaced to avoid the SANGs becoming too urban in feel. A buffer would be provided to the A352 which would include mounding, hedgerow planting and tree planting.</p>	
	<ul style="list-style-type: none"> <li>• All SANGs larger than 12ha must aim to provide a variety of habitats for users to experience (e.g. some areas of woodland, scrub, grassland, heathland, wetland, open water).</li> </ul>	<p>The SANGs include a wide range of natural landscapes to create a semi-natural space. The Heritage Country Park includes areas of open fields and grassland to provide walking routes of a natural feel. The Ecology Park includes wildflower meadow and grassland areas as well as an area of wetland, reedbeds and pond areas. These areas will lie adjacent to wet woodland, hedgerow, broadleaved woodland and grassland / scrub mosaic providing a barrier to the western boundary.</p>	
	<ul style="list-style-type: none"> <li>• Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.</li> </ul>	<p>The Heritage Country Park includes a dedicated space for dog walker with off-the-lead area. This area also includes a dog gym and pond. Bags and bins for dog fouling would be provided within this area.</p>	
	<ul style="list-style-type: none"> <li>• SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, dust, loud intermittent or continuous noise from traffic, industry, sports grounds, sewage treatment works, waste disposal facilities,).</li> </ul>	<p>The SANGs is located within the residential areas of the Site, away from unpleasant intrusions. The SANGs are also located outside the 400m development consultation areas around the Wool Waste Water Treatment Works, so would not be impacted by odours.</p>	
	<ul style="list-style-type: none"> <li>• SANGs should be clearly sign-posted or advertised in some way.</li> </ul>	<p>Signage would be strategically placed throughout the Development to advise of the SANGs and routes, including at car park areas. The SANGs allocation would be advertised to new residents of the Development by way of a website, newsletters and community activities / events.</p>	

Requirement	Criteria	Description and Location within SANGs	
	<ul style="list-style-type: none"> <li>SANGs should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.</li> </ul>	<p>Similarly to the above, leaflets would be distributed to the new residents of the Development and potentially to residents of the neighbouring settlements.</p>	
<b>Desirable:</b>	<ul style="list-style-type: none"> <li>It would be desirable for an owner to be able to take dogs from the car park to the SANGs safely off the lead.</li> </ul>	<p>The car park is located within the Heritage Country Park. As such dogs will be able to be led from the car to the SANGs.</p>	
	<ul style="list-style-type: none"> <li>Where possible it is desirable to choose sites with a gently undulating topography for SANGs.</li> </ul>	<p>The eastern part of the Site, including the Heritage Country Park has an undulating topography.</p>	
	<ul style="list-style-type: none"> <li>It is desirable that SANGs provide a naturalistic space with areas of open (non-wooded) countryside and areas of deciduous woodland and water features.</li> </ul>	<p>As aforementioned, the SANGs include a wide range of natural landscapes to create a semi-natural space. The Country Heritage Park includes areas of open fields / grass land and open wooded areas to enhance the circular walks. The Ecology Park includes wildflower meadow and grassland areas as well as an area of wetland and pond areas. These areas will lie adjacent to wet woodland, hedgerow, broadleaved woodland and grassland / scrub mosaic providing a barrier to the western boundary.</p>	
	<ul style="list-style-type: none"> <li>Where possible it is desirable to have a focal point such as a view point, monument etc within the SANGS.</li> </ul>	<p>The Heritage Country Park incorporates the Scheduled Monument Bronze Age Bowl barrow (SM 29044). As the Country Heritage Park is 19.3ha, the SM would become a positive focal point, but should not be subjected to significant increased recreational pressure.</p>	
	<ul style="list-style-type: none"> <li>It is desirable that smaller SANGs do not have grazing stock and that on SANGs with grazing animals there are always areas free from grazing stock with suitable walks of 2.3-2.5km.</li> </ul>	<p>The SANGs would not include land for grazing stock.</p>	
	<ul style="list-style-type: none"> <li>It is desirable that SANGs should be co-located with other features likely to attract use such as dog exercise areas, allotments, bmx/off road bike facilities etc.</li> </ul>	<p>The Heritage Country Park includes playing fields, a multi-use games area (MUGA) adventure play area, trim trail and dog gym activity area. There is also a climbing wall / centre and a visitor centre within the Ecology Park. Cycle routes are provided throughout the Development and these connect Cycle Route No.4, Briantspuddle – East &amp; West Holmewhich runs 200m to the north of the Site beyond the railway and provides connection to Wool.</p>	



# SANGS Management **5.1**

In summary the SANGS proposals on the main site are 24.6ha, with an additional 4.6ha on site Heathland Support and 21ha off site Heathland Support in the southern land holdings. The SANGS will be in private ownership with management funded through a central estate management fund. This approach will be used for the Heritage Country Park, Ecology Park and the Village Green. There is currently no warden for the Winfrith Heaths. As part of the development a warden will be funded. The management costs of the SANGS area will be funded / secured by management costs around the whole estate for residential and commercial.

A commitment to long term promotion of the SANGS to residents and dog walkers will be made (i.e. website, letter drops, events etc).

SANGS Management and mainenance plan will be prepared and agreed with NE, DWT, and RSPB. This will include monitoring, advertising and promotion of the SANGS.

## SANGS integrated into wider green infrastructure

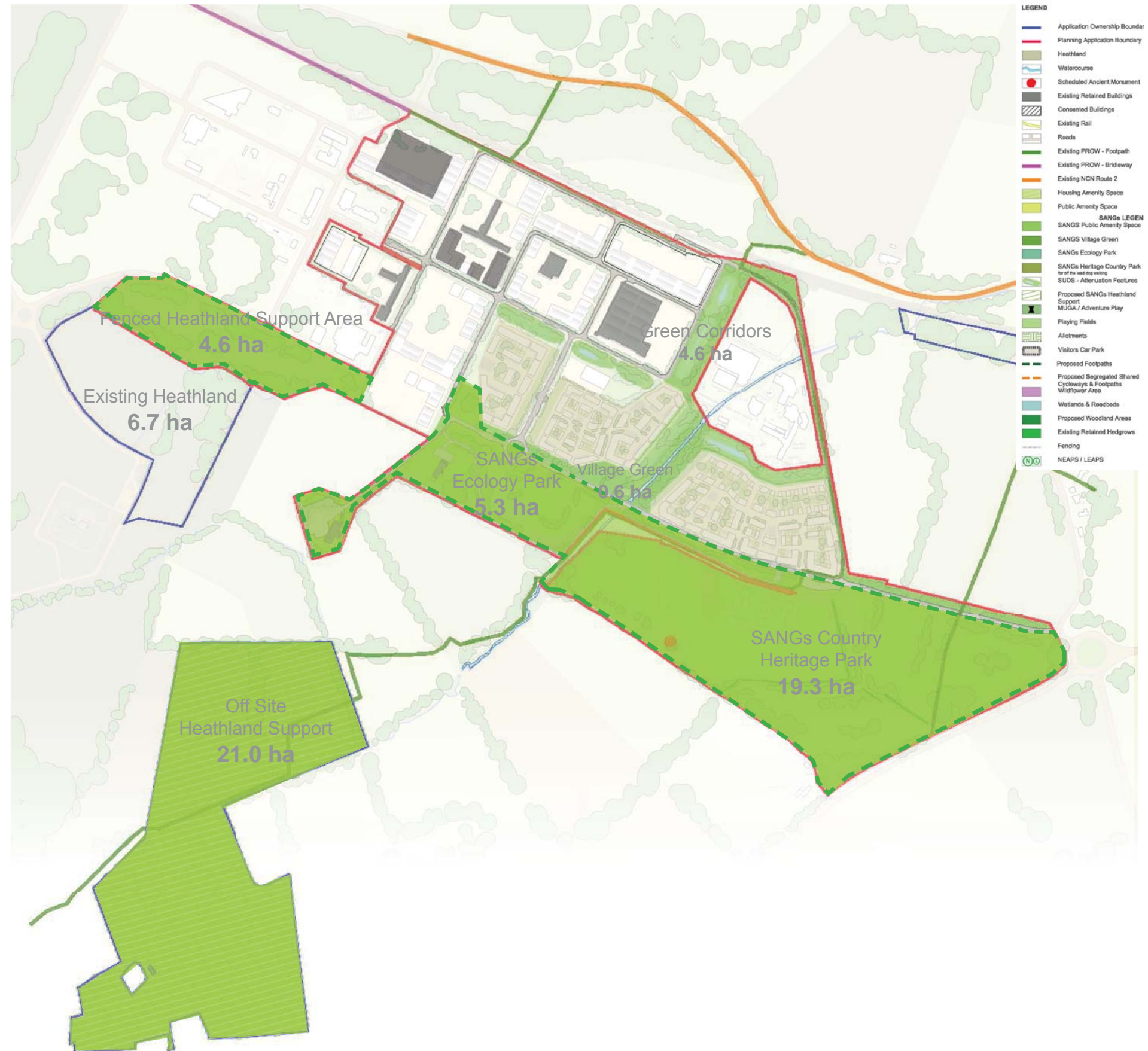


## SANGS Provision within Site

# 24.6 ha SANGS

**+4.6 ha on site heathland support**  
**+21.0 ha off site heathland support**

Ecology Park	<b>5.3 ha</b>
<ul style="list-style-type: none"> <li>• Ponds</li> <li>• Reedbeds</li> <li>• Wildflower areas</li> <li>• Allotments</li> </ul>	
Heritage Country Park	<b>19.3 ha</b>
<ul style="list-style-type: none"> <li>• Dog activity area</li> <li>• Car Park: capacity 30 (segregated for football use with gravel car park for dog walkers)</li> <li>• MUGA with sheltered area</li> <li>• Adventure play area</li> <li>• Acid grassland area</li> <li>• Fenced off long tussocky grass area for wildlife</li> </ul>	
Fenced On Site Heathland Support Area	<b>4.6 ha</b>
<ul style="list-style-type: none"> <li>• Wetlands including boundary water feature</li> <li>• Heathland creation</li> <li>• Reedbeds and ponds</li> </ul>	
Off Site Heathland Support	<b>21.0 ha</b>





pond for amphibians & invertebrates

wildflower area

allotments

reedbeds

MUGA & adventure playground with sheltered area

deep pond

off the lead dog walking area

existing public footpath

buffer treatment to A352 mounds & planting

birdhide

River Win

existing public footpath

football pitch / playing fields

visitor carpark

dog gym

ancient hedgerow

footpath

viewing mound on higher ground

footpath

shallow scrapes

wildflower area

footpath

visitors centre

wetland woodland

bouldering centre

woodland

scheduled ancient monument

fenced off perimeter area for wildlife

FARRELLS

# Purbeck District Council: Core Strategy

Submission on behalf of ZBV (Winfrith) Ltd

EiP Reference: 4953

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## SUSTAINABILITY APPRAISAL OF MAIN MODIFICATION

- 1.1 ZBV consider that the Sustainability Appraisal document such accompanies the Main Modifications published by Purbeck District Council for consultation in June 2012 is not fit-for-purpose.
- 1.2 Give the extent of the Main Modifications (both those put forward in May and the current June 2012 Main Modifications and the additional minor modifications) it is considered that a more thorough appraisal of the sustainability implications of the Main Modifications to the Core Strategy should have been undertaken. This should have included a more comprehensive assessment of the alternatives considered in accordance with the requirements of the Strategic Environmental Assessment (SEA) Regulations and recent case law. Reference should be made to the recent case law on this matter (Heard v Broadland District Council, South Norfolk District Council, Norwich City Council [2012] EWHC 344 (Admin)). Mr Heard claimed that the Joint Core Strategy was unlawful as the SEA conducted by the Authorities did not comply with two key requirements: (1) to explain the Authorities' reasons for selecting certain alternatives for evaluation; and (2) to examine the alternatives in the same depth as the preferred option. The claim was successful on both points.
- 1.3 For the Main Modifications, it is ZBV's view that this should have included a comparative appraisal of the alternatives considered throughout the Core Strategy preparation and in particular those where there are significant changes to the Pre-Submission Draft Core Strategy. In particular, any change or alternative which could give rise to significant environmental or

sustainability effects should have been properly tested by a comparative appraisal with other alternatives.

- 1.4 It is noted that, the latest SA Report includes at Annex 1 a SA appraisal of the now proposed policies of the Core Strategy. However, the appraisal does not provide an analysis or commentary on the likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, as required by the SEA regulations. Given the extent of the Main Modifications (both May and June 2012 changes) it is likely that the effects would differ from that previously reported in earlier SA reports and therefore the likely significant effects of the Core Strategy as currently drafted should have been reported. Further, it is likely that the cumulative effects of the Main Modifications themselves could give rise to significant environmental effects and no consideration of this is provided in the latest SA report. As such, ZBV consider that the environmental and sustainability effects of the overall Core Strategy are unclear. Further, the Sustainability Appraisal (SA) report provides no commentary on why the preferred options were chosen or any comparative analysis of the preferred option against other reasonable alternatives.
- 1.5 As set out in ZBV (Winfrith) Ltd representation on Matter 1 for the EIP, ZBV Ltd consider that the plan-making and preparation of the Core Strategy has consistency failed to identify, test and evaluate reasonable alternatives that reflect the current role and future opportunity presented by the Dorset Green Technology Park as a large brownfield site. In particular, as argued in our previous representations, we are of the view that a mixed use allocation at Dorset Green has not been properly tested in the SA/SEA.
- 1.6 The SEA Regulations require consideration of *'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme'*. Given that the Core Strategy fails to deliver housing needs over the plan period (and Spatial Objective 2 is to *'Meet Purbeck's housing needs'*), ZVB consider that reasonable alternatives have not been considered

in the preparation of the Core Strategy. The Council's own evidence in the 'Implications of Additional Growth Scenarios for European Protected Sites, 2010' suggested that 1,000 new homes could be accommodated around Wool (with the introduction of suitable mitigation measures to protect nearby protected heathlands). Further work was required by the Council in respect of this option but was not undertaken at the time and did not allow the spatial strategy to be fully informed by this potential option.

- 1.7 ZBV would also question how the growth options studies within the 'Implications of Additional Growth Scenarios for European Protected Sites, 2010' were selected and why these are considered to be 'reasonable alternatives'.
- 1.8 The Council's case for not considering higher growth levels in and around Wool in more detail is because they due to time constraints. Further, it is noted that 'Implications of Additional Growth Scenarios for European Protected Sites, 2010' was not a full HRA and therefore these higher growth options have not been considered in the same depth option the Council has pursued in preparing their Core Strategy.
- 1.9 Further, originally the Core Strategy (The Preferred Options Public Consultation, September 2009) proposed an Area Action Plan (AAP) for the Wool area which included 'clustering' with Dorset Green and Brovington. This approach was discounted but the alternative of not doing an AAP was never tested during the SA process. I would draw the Council's attention to recent case in the EU Court of Justice (Inter- Environment Bruxelles ASBL v Region de Bruxelles-Capitale).
- 1.10 ZBV would therefore question the adequacy of the Sustainability Appraisal in meeting European and National legal requirements, particularly in relation to the choice of the spatial locations for the growth and the consideration of potential alternatives to policies in this regard.