



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	Mrs	
Name	Sarah Hawkins	
Job Title (<i>where relevant</i>)	Regional Director	
Organisation (<i>where relevant</i>)	WYG Planning & Environment	
Address	11-12, Lower Park Road, Bristol	
Postcode	BS1 5BN	
E-mail	bristol.planning@wyg.com	
Tel. Number	0117 925 4393	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

or

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

Fax: 01929 557348

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

Return to Purbeck District Council by Tuesday 31st July 2012

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

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

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

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

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

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

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

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

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

To enable the Inspector to get a full understanding of the scope of our representation and to be able to test the evidence being promoted by the Council in support of the proposed main modifications.

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

Signature 

Date 30/07/12

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
x

Comments:

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM7

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
x

No Comment

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

(tick all that apply)

It is not 'justified'

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

x

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'

x

(For explanation of terms refer to guidance notes below)

Comments:

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

MM7 adds the requirement that 'new retail development must be concentrated within town centres or local centres as shown on the Proposals Map'. This is at odds with the National Planning Policy Framework (NPPF) which sets out a sequential assessment for retail and other town centre uses.

There is no local justification for a policy more restrictive than national policy in respect of the location of retail development. Indeed, the Council's own evidence base (notably Nathaniel Lichfield and Partners (NLP) Retail Impact Assessment 2010 (CD147), NLP Statement October 2010 (CD148), NLP November 2011 Statement (CD149)) has already demonstrated that an out-of-centre foodstore in Wareham would not give rise to unacceptable levels of impact on Wareham and Swanage Town Centres. This clearly indicates that no local circumstances exist which could justify a more stringent policy than that set out by the NPPF. As such, there is no evidenced basis to support the proposed modification relating to the location of new retail development.

Suggested Alterations:

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

Delete new text relating to location of retail development. Policy RP adequately deals with this matter.

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM10

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
x

No Comment

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

(tick all that apply)

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

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

It is not 'consistent with national policy' x

(For explanation of terms refer to guidance notes below)

Comments:

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

An interesting starting point for representations on this main modification is that the reason provided by the Council to why the plan would be unsound without it. Here, the Council correctly identify that their job in preparing the Local Plan is to meet objectively assessed needs for development in the district. But in proposing this main modification they palpably fail to make any allocation to meet the objectively assessed retail requirements for a new large foodstore in Purbeck to reduce the need for large quantities of its residents to drive out of Purbeck to undertake main food shopping.

It is suggested by the Council that the proposed modification reflects an update to the evidence base of retail floorspace needs. This is misleading. Rather, it reflects the Brief provided by the Council to its consultant in order to support its changed position to keep existing market shares constant, rather than seek to positively deliver sustainable development within Purbeck. Thus, the NLP November Statement 2011 (CD149) only considers retail needs on a constant market share approach, as requested by the Council. However, it is to be noted that population

projects have actually increased and not decreased as the Council suggest. As a result of these higher population figures a corresponding increase in identified expenditure capacity to support new retail development would result under all scenarios, had these been undertaken. Thus, had an increased market share scenario been run in 2011 it would have been found that a 2,000 sq m foodstore in Wareham could be supported even earlier than 2014 (together with an extension of the Co-op in Swanage), as had been previously found by NLP (see paragraph 4.47 of CD147).

The revised text of paragraph 6.7.3.1 explains that consideration was given to the allocation of a 2,000 sq m foodstore on the edge of Wareham, but that the Town Council, some local businesses and public are very concerned about negative impact on Wareham and Swanage town centres. However, this in itself is misleading and it ignores the broader level of support found to the prospect of a foodstore being allocated, as reported in the summary of consultations (see paragraph 1.4.3, CD17c). This summary shows that 54% of respondents in Wareham and the surrounding countryside supported the proposal for a new foodstore in Wareham. Thus, the Council is not only setting aside the technical evidence base it is also ignoring the wider public support for a large foodstore in Wareham. Whilst concerns about the potential impact on existing town centres are relevant, in this case the independent retail impact evidence of the Council's consultant is that a new large foodstore in Wareham will not give rise to a significant adverse impact on either Wareham or Swanage Town Centres (see conclusions of CD147, 148, 149) and so such views are misplaced in the current case. In such circumstances, it is simply not possible for the Council to set aside the technical evidence and the wider public support in favour of concerns of some stakeholders on retail impact grounds, which have been shown by independent consultants to be misplaced.

The Council note in MM2 that '..the roads are congested particularly during the holidays, and that there is no possibility of building new roads to alleviate the congestion'. However, they fail to see that by providing for the objectively assessed development needs of the district in Purbeck, in this case in the form of a new large foodstore, they can make a difference in the numbers of cars on those roads to alleviate congestion and in turn pollution to the benefit of the environment. It is only by allocating a large foodstore in Wareham as supported by the Council's own evidence, will they reduce the outflow of people to Poole and other locations for main food shopping purposes.

Suggested Alterations:

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

The suggested alteration is to revert back to the Proposed Changes to the Pre-submission version of the Core Strategy, September 2011, but with the following further changes:

Paragraph 6.7.1 – amend the end of the first sentence to read ‘.....5,500 sq m over the plan period’ and the second sentence to read ‘..... 3,500 sq m is for food

Paragraph 6.7.3.1 – amend the fifth sentence to read ‘Adopting a strategy to maintain existing market share levels throughout the plan period to 2027 results in the future growth in available expenditure not being sufficient to result in a quantitative need for a new store’.

New paragraph 6.7.3.2 – insert a new paragraph reading ‘The evidence base demonstrates that there is significant scope to claw back high existing levels of food retail expenditure leakage from the district by proactively planning for new development in the main towns of Swanage and Wareham. Provision of a new large foodstore at Wareham and an extension to the existing Co-operative store in Swanage would significantly improve the food retail offer of the district to the benefit of residents. The resulting increase in market share under this scenario would provide sufficient quantitative capacity to support the developments in the medium term. Pursuing such a strategy would reduce the necessity of trips to Poole or Dorchester to larger food stores, with associated economic, social and environmental benefits, which in turn would be achieved without any significant adverse impact on the existing town centres. The higher retention of food retail expenditure in the district and the two main towns is likely to result in positive spin off benefits for existing town centre retailers through linked trips to and from such new development.’

Existing Paragraph 6.7.3.2 – delete and replace with ‘This is considered a robust policy aspiration based on the principles of sustainable development that will deliver significant positive benefits to the economy of the district and the two main towns and its residents through an improved food retail offer to meet identified need and generating local choice and competition. Provision for an extended Co-operative store in Swanage will support and strengthen the town centre offer. In Wareham, provision is made for at least a new 2,000 sq m net foodstore on land at Worgret Road as the most sequentially preferable potentially available, suitable and viable site in the town for this form of development’.

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM11

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
x

No Comment

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

(tick all that apply)

It is not 'justified'

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

X

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'

X

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy RFS: Retail Floor Space Supply as proposed to be modified does not reflect the evidence base as read as a whole (see detailed comments set out in respect of MM10).

The reason for the proposed change is incorrect; population figures have actually increased by 7% (see CD 149). The actual reason for the lower floorspace figures now being quoted reflects the Council's changed position that existing low market shares should remain, so that a large proportion of the residents of Purbeck will continue to travel out of the district to meet their main food shopping requirements. Contrary to representations by third parties, surveys demonstrate that these trips are not undertaken as part of a trip associated with people's place of work, rather the vast majority are single purpose trips. As such, it is reasonable to conclude that the provision of a large foodstore in Purbeck would bring about a reduction in such trips with associated economic, social and environmental benefits; benefits that are identified by the Council's own consultant.

Suggested Alterations:

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

It is proposed that draft Policy RFS be amended to read as follows:

'Provision will be made for some 5,500 sq m (net) of retail floor space over the plan period 2006-2027 as follows:

- *2,000 sq m (net) of non food retail floor space; and*
- *3,500 sq m (net) of food retail floor space:*
 - *1,500 sq m in Swanage; and*
 - *2,000 sq m in Wareham.*

The floorspace will be located in accordance with Policy LD: General Location of Development. The floorspace in Wareham is to be provided in the form of a new foodstore to be constructed on the site on land at Worgret Road to be identified in subsequent plan(s) as a strategic retail development allocation for this purpose'.

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM12

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
X

No Comment

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

(tick all that apply)

It is not 'justified'

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

X

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'

X

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy RFS: Retail Floor Space Supply as proposed to be modified does not reflect the evidence base as read as a whole (see detailed comments set out in respect of MM10). It is also at odds with the NPPF (see also comments set out in respect of MM 7).

There is no evidence of local circumstances which would justify a policy for the location of retail development to be more stringent than that set out in the normal sequential approach to site selection. Indeed, the evidence that is available suggests that a) there are limited town centre or edge-of-centre opportunities available, so such a policy could thwart the delivery of much needed floorspace and b) that out-of-centre development in the form of a 2,000 sq m foodstore in Wareham would not give rise to significant adverse impacts.

Suggested Alterations:

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

It is proposed that draft Policy RFS be amended to read as follows:

'Provision will be made for some 5,500 sq m (net) of retail floor space over the plan period 2006-2027 as follows:

- *2,000 sq m (net) of non food retail floor space; and*
- *3,500 sq m (net) of food retail floor space:*
 - *1,500 sq m in Swanage; and*
 - *2,000 sq m in Wareham.*

The floorspace will be located in accordance with Policy LD: General Location of Development. The floorspace in Wareham is to be provided in the form of a new foodstore to be constructed on the site on land at Worgret Road to be identified in subsequent plan(s) as a strategic retail development allocation for this purpose.'

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM22

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
x

No Comment

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

(tick all that apply)

It is not 'justified'

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

x

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'

x

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy CEN should be revised to reflect the evidence base that concludes that the Middle School playing fields site, if available, is the most sequentially preferable site to accommodate a large foodstore (see #1.19 of CD147). This policy will then accord with the changes sought in respect of retail floorspace requirements (see detailed comments under MM10, 11 & 12).

The proposed change to the policy should, at the very least, make reference to the future use of this site for a large foodstore, if it is shown to be available, in line with the evidence base.

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).

Policy CEN should be amended to plan for a large foodstore as part of the proposed mixed-use settlement extension.

It is proposed that the policy should read:

'...the playing fields should be re-used for a large foodstore to meet the identified need.'

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM58

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
X

No Comment

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

(tick all that apply)

It is not 'justified'

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

X

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'

X

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy RP: Retail Provision should use the terminology set out in NPPF in respect of retail impact.

Suggested Alterations:

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

It is proposed that Policy RP is amended to read:

‘Development outside town centres and local centres that is likely to have significant adverse impact on their vitality and viability or planned public and private investment will not be permitted...’

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM59

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
X

No Comment

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

(tick all that apply)

It is not 'justified'

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

X

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'

X

(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 is no local justification for adopting a threshold of 1,000 sq m for the production of an impact assessment for retail, office or leisure developments. The default threshold where no local threshold is set out is 2,500 sq m, as set out in #26 of the NPPF. In the current case, the impact of a foodstore of 2,000 sq m has already been undertaken by the Council's consultant and it has been shown that such a foodstore will not give rise to significant adverse impact on either Swanage or Wareham Town Centres. Therefore, there is no justification of seeking a threshold under this level.

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).

Policy RP should be amended to read:

'Planning applications for retail, office or leisure development over 2,000 sq m that are outside of town centre boundaries will need to submit an impact assessment prepared in accordance with national guidance...'

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

Guidance Note for Completing Representation Form

1. Introduction

- 1.1 Consultation on the Main Modifications to the Core Strategy is made as part of the examination process and responses will be considered by the Planning Inspector. The Planning and Compulsory Purchase Act 2004¹ (the 2004 Act) states that the purpose of the examination is to consider whether the Core Strategy complies with the legal requirements and is '**sound**'.
- If you are seeking to make representations on the **way** in which the Council has prepared the Core Strategy it is likely that your comments or objections will relate to a matter of **legal compliance**.
 - If it is the **actual content** on which you wish to comment or object it is likely it will relate to whether the Core Strategy is **justified, effective or consistent with national policy**.

2. Legal Compliance

- 2.1 The Inspector will first check that the Core Strategy meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making a representation on legal compliance:
- The Core Strategy should be within the current Local Development Scheme² (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce over a 3 year period. It will set out the key stages in the production of the Core Strategy which the Council proposes to bring forward for independent examination. If the Core Strategy is not in the current LDS it should not have been published for representations.
 - The process of community involvement for the DPD in question should be in general accordance with the Council's Statement of Community Involvement (SCI)³. The SCI is a document which sets out the Council's strategy for involving the community in the preparation and revision of its plans, including the Core Strategy.
 - The Core Strategy should comply with the Town and County Planning (Local Development) (England Regulations) 2004 as amended⁴. Prior to submission the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The Council must also place local advertisements and notify the statutory bodies (as set out in the regulations) and any persons who have requested to be notified.
 - The Council is required to publish a Sustainability Appraisal report prior to submitting the Core Strategy. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
 - The Core Strategy should have regard to national policy set out in Planning Policy Statements/Guidance and Circulars⁵.
 - The Core Strategy must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. county and district). These are the Purbeck Community Plan 2009-2020⁶ and The Community Strategy for Dorset (2007-2016)⁷.

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

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

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

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

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

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

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.

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:

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

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

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the Core Strategy on which you are seeking to make representations or in any other part of the Purbeck Local Plan⁸. There is no need for repetition between documents in the Local Plan.
- If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy and what should the policy say?

4. General advice

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

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

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

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

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

Subject Matter and Area Covered by the Document

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

Period for Representations

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

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

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

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

Consultation Arrangements

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

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