

Consultation response to Major Modifications to PDC Core Strategy

Mod. No.	Section	Comments
	<p>Overall comments on Major Modifications</p>	<p>Not Legal.</p> <p>There has been inadequate consultation on Major Modifications. Only ad in papers and email out to PDC contacts. No publication of major changes, e.g Transferring the majority of retail allocation requirement to Swanage (could result in an out of town supermarket or extended supermarket that effects viability of town centre)</p> <p>There seems to be key omissions from the Core Strategy that could render Purbeck unsustainable, it depends on future plans to allocate housing, retail and employment sites, as well as no economic or housing strategies, no Gypsy and Traveller proposals, and a Transport Strategy that relies on extra buses and the rail link to deal with traffic congestion.</p> <p>It is questionable whether residents of Purbeck would agree that the Core Strategy has been prepared following extensive and meaningful engagement with the community and whether it truly reflects spatial (South East Purbeck/Swanage) aspirations.</p> <p><i>Propose: Go back to the drawing board to produce a sustainable Strategy</i></p>
MM2	<p>New Section Partial Review (PDC proposes to issue this Core Strategy and then review housing numbers etc again in 3 years- rather than go back to the drawing board and get this Strategy correct</p>	<p>Not sound.</p> <p>PDC are seeking a Partial Review of Housing Need in 2015. With limited evidence base and no Housing Strategy in place there can be no certainty that the proposed numbers and locations are correct.</p> <p>There is still not enough about the protection of and managing AoNB</p> <p>PDC themselves are saying that mitigation will be required and that there is a shortfall in meeting housing needs. A more imaginative and creative sustainable approach is required, for example exploring the Dorset Green (Winfrith Technology Centre) approach. A partial review does not sound strategic and could be market led and reactive.</p> <p>Where are the policies to say when enough is enough for housing allocation in certain areas? It seems Wool is the only place where PDC feels this is the case. Why can't their criteria be checked against other areas to give an indication of where growth may be sustainable in the future?</p> <p>There has been no Housing Needs Survey for Swanage (and most of Purbeck) therefore need has not been proven. The latest housing allocations system/process is now Dorset wide allowing any applicant to state anywhere in Dorset as their preferred option. We need a housing strategy that prioritises local allocations (PDC spatial areas -SE, Central, etc- maybe), for need, linked with jobs, as has been done in new town developments.</p> <p>There is no protection that market housing will be predominantly family housing and not second homes, or Executive luxury (as per Sandbanks and more recently Glebe Estate in Studland- within PDC).</p> <p><i>Proposal. Go back to the drawing board to find areas in Purbeck that can be developed sustainably, supported by a firm evidence base, and include aspiration of achieving National Park Status to help protect our unique landscape and habitat.</i></p>
MM5	<p>Chapter 5 Principals and General Location of Development</p>	<p>Not sound.</p> <p>The statement on Sustainable Development does not reflect Purbeck's unique landscape and habitats. PDC admit that they have "tacked on" one short paragraph about ensuring developer provides effective mitigation "if necessary" for European protected sites. There appears to be limited protection for AoNB, with policies and guidelines still to be developed. Surely these should be an essential companion to the Core Strategy if we are to protect our unique landscape for future generations.</p>

		<p>There are no guarantees that the affordable housing will be provided in the spatial area e.g Swanage, where the market housing is built, thus reducing sustainability in local areas.</p> <p><i>Propose a more robust, proactive statement to protect Purbeck. Whilst we recognise that it is not necessary to repeat policies that are in the NPPF we feel that Purbeck has such a unique geology, landscape and habitat that the Council should be making additional policy in relation to protecting AONB, especially to ensure that it meets the soundness tests for sustainability.</i></p>
MM10)	6.7.3 Retail Floor Space Supply	<p>Not legal or sound. Major change to retail supply location. "An update from the Council's retail consultants, NLP, (November 2011),... has identified a need for food floor space of around 1,250-1,300sqm for the plan period. Of this around 900-950sqm should be met in Swanage and around 50-60sqm in Wareham with the balance met in other town centres and local centres."</p> <p>Whilst we are comforted by the fact that revised Policy reflects more appropriately the needs of residents in Purbeck (insofar as it reflects the findings of the NLP Retail Impact Assessment - unlike the proposal for a new out of centre foodstore in Wareham), we are concerned that it does not go far enough to protect the ongoing vitality and viability of Swanage Town Centre. In the absence of an exclusive policy allocation to accommodate additional retail within the town centre, we are concerned that this leaves the door open for out of centre retail floorspace to come forward (in the knowledge that there is capacity for additional retail floorspace). This is compounded by the fact that the proposed threshold for requiring an assessment of retail impact is far too high (1,000 sqm, therefore no assessment would be required for Swanage), taking into account the type of retail provision that already exists within the Town Centre (ie small scale local provision). It does not account for the fact that even a small amount of out of centre retail floorspace in Swanage has the potential to undermine the vitality and viability of the town centre.</p> <p>In applying national averages to take into account non store retail trade, we also suspect NLP has significantly underestimated the extent to which Purbeck residents undertake their main food shopping online - it is reasonable to suggest that a higher proportion of Purbeck residents undertake their main food shop online (compared to that of the national average), taking into into account the limited number of medium to large food store provision within the District. In underestimating online expenditure, NLP will have overstated capacity for additional retail floorspace within the District.</p> <p>Lastly, we note that there is insufficient provision within the proposed Core Strategy to prevent excessive non food provision coming forward as part of a proposal to extend the existing convenience goods retail floorspace. The proliferation of non food retail floorspace as part of an extension to the Co-op, for example, is likely to be to the detriment of independent non food shopping provision within the remainder of the town centre.</p> <p><i>Propose that "the majority of retail space is in Swanage" deleted and meaningful consultation undertaken with a proven evidence base.</i></p>
MM36	SE South East Purbeck	<p>Not legal or sound. See MM10. No consultation or adequate evidence to support that Swanage takes the majority of retail space in Purbeck. No consideration of the impact of large supermarket on the viability of the town retail sector. PDC are recommending 900-950sqm in Swanage so no retail impact assessment would be required with their 1000sqm threshold proposal.</p>
MM38	SE	<p>Not sound. The statement about extension settlements is not acceptable. There is no</p>

	South East Purbeck	protection for playing fields at Swanage Middle School as per Central chapter for Wareham Middle School Playing fields. <i>More stringent conditions need to be attached to any extension settlement to protect landscape and sustainability. Include same statement as Wareham Playing Fields.</i>
MM56	8.8.7.7 Water Quality Issues	Not sound. Do not seem to have recognised that “run off” flooding is not just a town centre probability but extends all along the valley to Herston. Does not appear to be any consideration of impact of development on the sea coast. Swanage water quality has already been breached without additional development/sewage. There is no mention in the Modifications that Wessex Water state that the cost of upgrading the sewage and drainage system for Swanage for only 640 new dwellings (an earlier version, there are now over 900 dwellings in current strategy) would be £1-£2m and possibly up to £4m (as stated in Purbeck Infrastructure Plan Vol 9 10 th July 2012) <i>Include all information to inform the Strategy.</i>
MM64	Design	The Core Strategy should be more explicit on density as there is evidence that town scape character assessments are not currently working in Swanage, see Cranborne Road area.