



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*)

	Your Details	Agent's Details (<i>where relevant</i>)
Title	Mr	Mrs
Name	Paul Bedford	Sarah Hamilton-Foyn
Job Title (<i>where relevant</i>)	Senior Land and Planning Manager	Associate
Organisation (<i>where relevant</i>)	Persimmon Homes (South Coast) (part of the North Dorchester Consortium)	Pegasus Planning Group
Address		Pegasus House, Querns Business Centre, Whitworth Road, Cirencester
Postcode		GL7 1RT
E-mail		Sarah.hamilton-foyn@pegasuspg.co.uk
Tel. Number		01285 641717

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 checked="" type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary in the space below:

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: Sarah Hamilton-Foy

Date 25th July 2012

Representations:

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

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

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

Please use the forms overleaf to submit your response.

FORM A: Your Comments on Legal Compliance

Are the Main Modifications to the Core Strategy legally compliant?

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

Yes

No

No Comment
√

Comments:

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

FORM B: Your comments on the Schedule of Main Modifications

PLEASE USE A SEPARATE SHEET FOR EACH REFERENCE NUMBER

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

MM2

Comments without the relevant reference number will not be accepted.

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

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

Yes

No
✓

No Comment

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

(tick all that apply)

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

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

It is not ‘consistent with national policy’

(For explanation of terms refer to guidance notes below)

Comments:

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

Main Modification MM2 refers to the partial review of the Local Plan and in new paragraph 1.2.3 states that a partial review to investigate ways of meeting housing needs will be undertaken. The partial review will plan for growth in the medium to longer term and will be started by the end of 2015.

The new paragraph then states that the role of Purbeck in facilitating strategic growth at Crossways as proposed in the West Dorset, Weymouth and Portland Local Plan will be considered.

Persimmon Homes object to the main modification – the Local Plan should be NPPF compliant and provide for an appropriate timescale, preferable 15 year time horizon (paragraph 157 of the NPPF).

It is consider that the proposed main modification cannot be justified, neither is it effective (para 182 of the NPPF). The Local Plan should not refer to a proposed strategic allocation at Crossways which has yet to be the subject of Examination. The West Dorset, Weymouth and Portland Pre-Submission Plan commenced consultation in June 2012.

Persimmon Homes as part of the North Dorchester Consortium is objecting to the proposed strategic

allocation of 1,500 dwellings and 7 hectares of employment at Crossways which is included in the Pre-Submission Draft Local Plan June 2012. It is not consistent with the settlement hierarchy and role and function of the settlements in the eastern area of West Dorset and there is a lack of available planning and environmental evidence to justify the allocation. The West Dorset, Weymouth and Portland (WDWP) Pre-Submission Draft proposes a significant increase on the existing population in an unsustainable location for a strategic allocation, given the existing level of infrastructure at the settlement. Furthermore, there is no allocated or confirmed sustainable alternative natural greenspace (SANG), or other local mitigation measures specified, to provide certainty that the development's impact on European-protected heathland can be mitigated, in which case the Local Plan is considered to fail the requirements of the Habitats Regulations

The allocation has been introduced at a very late stage in the preparation of the WDWP Local Plan; proposals for Crossways were the subject of very limited discussion with local resident communities prior to the progression of Policy CRS1 at Pre-Submission Stage. Consequently, the proposal has not been subject to public consultation as part of the formal stage of plan making in West Dorset.

The WDWP has not been formally submitted to the Secretary of State for Examination, if the proposed strategic allocation at Crossways remains in the submitted plan it will be subject to formal examination in 2013 (according to the timescale indicated by West Dorset Council).

It is therefore considered inappropriate for Purbeck Core Strategy/Local Plan to reference this draft strategic allocation without any caveats that this draft will be subject to soundness testing at the West Dorset, Weymouth and Portland Local Plan examination.

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).

Persimmon Homes consider that the bullet point in paragraph 1.2.3 should be amended as follows: (bold underlined text)

“The role of Purbeck in facilitating strategic growth at Crossways as **currently** proposed in the **emerging** West Dorset, Weymouth and Portland Local Plan, **subject to this allocation being confirmed following public examination and adoption of the plan.**”

For the reasons outlined above primarily, that Persimmon Homes as part of the North Dorchester Consortium have objected to the strategic allocation as proposed in the West Dorset, Weymouth and Portland Local Plan Pre-Submission June 2012. The plan will need to be examined by the Planning Inspectorate, therefore there is no certainty that the proposal for a strategic allocation at Crossways will remain in the Plan.

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):

MM3

Comments without the relevant reference number will not be accepted.

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

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

Yes

No
✓

No Comment

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

(tick all that apply)

It is not ‘justified’

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

✓

It is not ‘effective’

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

✓

It is not ‘consistent with national policy’

(For explanation of terms refer to guidance notes below)

Comments:

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

Persimmon Homes as part of the North Dorchester Consortium note that the new section 1.5 Duty to Cooperate states in paragraph 1.5.3 that Purbeck District Council will work with WDDC to help deliver the associated infrastructure that is required in Purbeck District, in particular links to Moreton railway station.

Persimmon Homes has concerns about the soundness of the WDDC plan as there is a lack of evidence to show that the duty to co-operate has been addressed, this would also apply to Purbeck Core Strategy in respect of the potential strategic allocation at Crossways. It would appear that from PDC’s response to the Inspector’s question on the Duty to Co-operate (Question 2) that neither Council have co-operated to date to the extent that they should have done on the proposed strategic allocation at Crossways. The references seem to be about future working rather than what has taken place in the preparation of their respective Local Plans.

The proposed strategic allocation at Crossways has only just been included at the Pre-Submission

stage of the West Dorset, Weymouth and Portland Local Plan, consultation commenced on 1st June until 27th July 2012. Consequently, the proposal has not been subject to public consultation as part of the formal stage of the plan making in West Dorset.

Objections are being submitted to the WDDP including responses from the developer members of the North Dorchester Consortium (Grainger Plc and Persimmon Homes) that will need to be formally examined.

It is therefore considered inappropriate for Purbeck Core Strategy/Local Plan to reference this draft strategic allocation without any caveats that this draft will be subject to soundness testing at the West Dorset, Weymouth and Portland Local Plan examination.

It is also noted that any proposed strategic housing growth on the boundary of Purbeck in West Dorset will need to be tested in terms of cumulative impact on the integrity of European protected heathland habitat 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).

Persimmon Homes consider that the paragraph 1.5.3 should be amended as follows: (bold underlined text)

West Dorset District Council (WDDC) is **currently** proposing strategic growth at Crossways **through its emerging Local Plan, although this proposal remains to be tested at public examination and subsequently adopted. Through the duty to co-operate** the Council will work with WDDC to help deliver the associated infrastructure that is required in Purbeck District, in particular links to Moreton Station. **It is also noted that the cumulative effects of any planned housing development within West Dorset District and Purbeck District that is within 5km of European-protected heathland habitat will need to be assessed in terms of the requirements of the Habitats Regulations to ensure no adverse impact upon integrity.**

For the reasons outlined above primarily, that Persimmon Homes as part of the North Dorchester Consortium have objected to the strategic allocation as proposed in the West Dorset, Weymouth and Portland Local Plan Pre-Submission June 2012. The plan will need to be examined by the Planning Inspectorate, therefore there is no certainty that the proposal for a strategic allocation at Crossways will remain in the Plan.

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