

Swanage Town and Community Partnership Response to PDC Core Strategy Major Modifications  
 Consultation 31<sup>st</sup> July 2012

	<p><b>Overall</b></p>	<p><i>Not Legal.</i>          Minimum 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          There seems to be key omissions from the Core Strategy that could render Purbeck unsustainable, depending on future plans to allocate housing, retail and employment sites, as well as no economic strategy or firm Gypsy and Traveller proposals, and a seemingly unproven Transport Strategy.          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 aspirations.  <i>Go back to the drawing board.</i></p>
<p>MM2</p>	<p><b>New Section Partial Review</b></p>	<p><i>Not sound.</i>          Although there is recognition that development in Purbeck is exceptionally constrained- it has identified areas for extension settlements e.g. Swanage, without ensuring they can be mitigated, whilst not identifying other potential sites in less constrained areas that require no/less mitigation.          Still no evidence of Housing need to justify the numbers stated.          Still no mention of Dorset Green as a sustainable development site for work/live.          Still not enough about the protection of and managing AoNB.          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 approach. A partial review does not sound strategic and could be market led and reactive.          In PDC Statement on the Implications to the Core Strategy of the NPPF, it is interesting to note that Natural England feels that extension settlements in Swanage are achievable but queries any Dorset Green proposals. Mitigation is just one element for sustainable development and it feels there has been scant regard for the other elements when determining housing allocation numbers in Swanage. 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?          There has been no Housing Needs Survey for Swanage 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 maybe), for need, linked with jobs, as has been done in new town developments. What protection have we got 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).  <i>Go back to the drawing board to find areas that can be developed sustainably and include aspiration of achieving National Park Status</i></p>
	<p>2.2          Section 1:          Building a strong competitive economy</p>	<p><i>"2.2.3 Ahead of the Site Allocations Plan and Swanage AAP the Council will consider preparing an economic strategy that is consistent with the emerging LEP strategy..."</i> This wording does not seem to appear in the Main Modifications document, rather in a PDC statement on the implications to the Core Strategy of the Publication of the NPPF. The wording of this section is unacceptable. It seems that PDC do not have an economic vision and strategy which positively and proactively encourages sustainable growth, relying</p>

		<p>almost entirely on house building. They are merely considering one. What will happen when all the houses are built? What jobs will the people do and how far are they expected to travel on an unsustainable travel infrastructure? It is 12.6 miles to Holton Heath, 19 miles to central Poole and 13 miles, via ferry (£7 return), to Bournemouth.</p> <p>The NPPF also states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Why then does the Core Strategy allocate even more land at Prospect Farm in Swanage, where the existing site remains unbuilt. There is clearly no understanding or evidence to show what will boost sustainable economic growth in Swanage.</p> <p><i>An Economic Strategy needs to be produced as a companion to the Core Strategy not after and not “considering” preparing.</i></p>
MM4	3.1	<p><i>Not Sound</i></p> <p>960 new dwellings are planned for SE Purbeck, at least 20% are expected to be second homes and will only achieve around 250 affordable homes at maximum.</p> <p><i>Go back to the drawing board. Reduce the overall numbers in SE and include more creative ways of achieving affordable homes eg. Grant Shapps Housing Policy and £30m fund for self-build housing.</i></p>
MM3	1.5 Duty to co-operate	<p><i>Not sound.</i></p> <p>Good that working with Dorset Local Enterprise Partnership, but no recognition of traffic congestion more commuting will cause. And is this acceptance that most jobs will be in Poole/Bournemouth.</p> <p><i>A comprehensive Economic Strategy needs to be in place at the same time as the Core Strategy to ensure sustainability and to build an understanding of wealth creation/employment opportunities in Purbeck</i></p>
MM5	Chapter 5	<p><i>Not sound.</i></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>We are unable to determine whether the evidence used is proportionate as the numbers keep moving and many seem to be based on “adjusted” national figures. We are also unclear if the CIL and or Section 106 (or replacement) are realistic and achievable. It appears that the 40% and 50% Affordable Housing: Market Housing are questionable as an open book approach is being taken that would indicate that movement on percentages is expected (indeed we can find no evidence of 50% being achieved, particularly in a small, isolated coastal town). There is also no presumption that the affordable housing will be provided in the spatial area where the market housing is built, thus reducing sustainability.</p> <p><i>A more robust, proactive statement to protect Purbeck is needed. 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>
MM7	LD	<p><i>Not sound.</i></p> <p>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</p>

		<p>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), taking into account the type of retail provision that already exists within the Town Centre (ie small scale local provision). Indeed PDC are recommending 900-950sqm in Swanage so no retail impact assessment would be required.</p> <p><i>Go back to the drawing board</i></p>
MM8	6.15 New Para	<p><i>Not sound.</i></p> <p>PDC seeking a Partial Review of Housing Need in 2015. With a limited evidence base and no Housing Strategy in place there can be no certainty that the proposed numbers and locations are correct.</p> <p><i>Go back to the drawing board.</i></p>
MM10)	6.7.3	<p><i>Not legal or sound.</i></p> <p>Major change to retail supply location. “An update from the Council’s retail consultants (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), 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>Go back to the drawing board and carry out accessible consultation and. a retail impact assessment prior to inclusion in a Core Strategy</i></p>
MM11)		See MM10
MM12)		<p>See MM10 Not legal or sound. A major change to retail allocation moving from Wareham to Swanage without consultation. It is not clear what “majority” means.</p> <p><i>Remove statement that Swanage takes the majority of retail space.</i></p>

MM16	SW	Note reduction in affordable housing requirement that puts pressure elsewhere in Purbeck.
MM34	SE	<i>Not sound</i> Different language is used compared to Central Purbeck section, stating 50% affordable housing in Wareham whilst quoting 260 affordable dwellings in SE Purbeck. Indicating that there could be less than 50% in SE <i>Go back to the drawing board.</i>
MM36	SE	<i>Not legal or sound.</i> 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.
MM37	SE	<i>Not sound.</i> Changed to extension settlement of <u>approximately</u> 200 dwellings. Not only is 200 too many for Swanage the term approximately allows upward movement as well as down. <i>Go back to the drawing board and review housing allocations across PDC starting with areas that are less constrained, more accessible and sustainable.</i>
MM38	SE	<i>Not sound.</i> The statement about extension settlements is not acceptable. There is no protection for playing fields at Swanage Middle School, or St Mark's 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>
MM51		<i>Not sound.</i> No Gypsy and Traveller site allocated. Hull council's Core Strategy was found unsound for this reason.
MM56	8.8.7.7	<i>Not sound.</i> 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 (over 900 in current strategy) would be £1-£2m and possibly up to £4m (as stated in Purbeck Infrastructure Plan Vol 9 10 <sup>th</sup> July 2012) <i>Include all information to inform the Strategy.</i>
MM58	RP	<i>Not sound.</i> See MM10. Plus needs to be more explicit about not allowing out of town supermarkets in PDC.
MM59	RP	<i>Not sound</i> See MM10- The proposed threshold for requiring an assessment of retail impact is far too high (1,000 sqm), 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.
MM61	Facilities and Services	Can the Localism Bill be used here in that criteria should include; that the Community have had an opportunity to take over the service before change of use considered.
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.
MM72	IAT	<i>Unsound.</i>

		<p>A PDC statement on the implications to the Core Strategy of the Publication of the NPPF states that “The Purbeck Transportation Strategy mitigates any adverse impact of growth on the constrained road network” therefore does not appear as a Main Mod.</p> <p>We strongly refute that the Purbeck Transportation Strategy mitigates any adverse impact of this growth. We have seen Dorset County Council Committee agendas that state the budget for transport has substantially reduced. Therefore any substantial and effective management systems will not be put in place. There will definitely not be better, or sufficient, public transport linked to housing growth to help improve the self sufficiency of Swanage, and probably other towns and villages. We are still unclear when the rail link will be open (noted; map 15 in Core Strategy states 2012) and just how much traffic this will mitigate.</p>
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