# **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		Andrew Elliott
Job Title ( <i>where relevant</i> )		Technical Director
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#### Responses should be sent to:

#### Email: Idf@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**

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?

✓ No, I do not 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

Date 31 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

<b>Are the Main Modifications to the Core Strategy legally compliant?</b> (In other words, has the <b>process</b> of preparing this version of the Core Strategy been followed in accordance with national guidance?)				
Yes	No	No Comment		
<b>Comments:</b> 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 refe	rence 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	s change to the Core Strategy be	e unsound because:		
	(tick all tha	t apply)		
It is not 'justified' (i.e. the proposed change is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)				
It is not 'effective' (i.e. the proposed change is not <u>deliverable</u> , not <u>fle</u>	<u>exible</u> and not able to be <u>monitored</u>	2		
It is not 'consistent with national policy'				
(For explanation of terms refer to guidance no	otes below)			
<b>Comments:</b> Please use the space below to provide more detailed comments (expand box as necessary)				
Grainger plc observes that proposed paragraph 1.2.3 makes reference to "facilitating strategic growth at Crossways as proposed in the West Dorset, Weymouth and Portland Local Plan".				
It is concerned about the soundness of this statement on the basis that the potential strategic allocation at Crossways:				
<ul> <li>Has only just been proposed at pre-submission stage of the West Dorset, Weymouth and Portland Local Plan, with consultation commencing in June 2012</li> </ul>				
<ul> <li>Has not previously been subject to public consultation as part of the formal stage of plan making in West Dorset</li> </ul>				
<ul> <li>Will be subject to objections, including responses from the developer members of the North Dorchester Consortium (Grainger plc and Persimmon Homes) that will need to be formally examined.</li> </ul>				

It is therefore considered inappropriate for the Purbeck Core Strategy / Local Plan to reference this draft strategic allocation without caveats that this draft allocation 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).

It is recommended that the third bullet of paragraph 1.2.3 is re-worded as follows:

• The role of Purbeck in facilitating strategic growth at Crossways as <u>currently</u> proposed in the <u>emerging</u> West Dorset, Weymouth and Portland Local Plan, <u>subject to this allocation being</u> <u>confirmed following public examination of the plan.</u>

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		
lf y	rou have chosen 'No', do you co	onsider this change to the Core S	trategy be unsound because:		
			(tick all that apply)		
It is not 'justified' (i.e. the proposed change is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)					
It is not 'effective' (i.e. the proposed change is not <u>deliverable</u> , not <u>flexible</u> and not able to be <u>monitored</u> )					
It is not 'consistent with national policy'					
(For explanation of terms refer to guidance notes below)					
<b>Comments:</b> Please use the space below to provide more detailed comments (expand box as necessary)					
Grainger plc observes that proposed paragraph 1.5.3 states that Purbeck District Council will work with West Dorset District Council to help deliver infrastructure for strategic growth at Crossways, in particular links to Moreton railway station.					
Grainger is concerned about the soundness of this statement on the basis that the potential strategic allocation at Crossways:					
•	<ul> <li>Has only just been proposed at pre-submission stage of the West Dorset, Weymouth and Portland Local Plan, with consultation commencing in June 2012</li> </ul>				
•	Has not previously been making in West Dorset	subject to public consulta	tion as part of the formal stage of plan		

• Will be subject to objections, 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 the Purbeck Core Strategy / Local Plan to reference the Crossways proposal without caveats that this draft allocation 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).

It is recommended that paragraph 1.5.3 be re-worded:

1.5.3 West Dorset District Council (WDDC) is <u>currently</u> proposing strategic growth at Crossways through its emerging Local Plan, although this proposal remains to be tested at <u>public examination</u>. 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 Europeanprotected heathland habitat will need to be assessed by both Districts in terms of the requirements of the Habitats Regulations to ensure no adverse impact upon integrity.