

Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010
Consultation Responses
Part 12**



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Saddington D

6368
20/12/10



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details	Agents Details (where relevant)
Title	MR
Name	DEREK SADDINGTON
Job Title (where relevant)	RETIRED
Organisation (where relevant)	
Address	4 Mount Moor Swanage
Postcode	BH192EZ
E-mail	
Tel. Number	01929 423657

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

Briefings on how to complete these forms and the process involved will be held on:

- 10th November, 7pm, District Council offices, Wareham
- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm, District Council offices, Wareham

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For further information, visit http://www.dorsetforyou.com/purbeck_consultation, email or call 01929 557273 to speak to a member of the Planning Policy Team.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy: 6.4.5 CORE STRATEGY	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

No CONSULTATION WITH SWANAGE WITH REF. TO NEW HOUSING.

① JOBS ARE NOT AVAILABLE.

② THE AREA WOULD BE SPOILED IN THIS AREA OF NATURAL BEAUTY.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

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Please state the part of that document you are commenting on:

Policy : <i>CORE STRATEGY 6.5</i>	Paragraph:	Map:
--------------------------------------	------------	------

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Comments:

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

① THE 27.5% ALLOWANCE OF VIEW HOUSING IN SWANAGE IS OUTRAGEOUS. WHEN THERE ARE NO JOBS.

② THE ONLY MAIN ROAD OUT OF SWANAGE IS OVER CONGESTED WITH SLOW MOVING TRAFFIC AT PEAK TIMES.

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Policy : CORE STRATEGY	Paragraph:	Map:
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It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>	<input type="checkbox"/>		
It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

IT IS A FACT THAT THERE ARE FAR TOO MANY SECOND HOMES IN SWANAGE. BUILDING MORE WOULD JUST BUILD THAT NUMBER UP

Saddington J

6369
20/12/10



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

	Your Details	Agents Details (where relevant)
Title	MRS	
Name	Jean Saddington	
Job Title (where relevant)		
Organisation (where relevant)		
Address	Sea View 4 Mount Scar, Swanage	
Postcode	BH14 2EZ	
E-mail		
Tel. Number	01929 423657	

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy: <i>out of Core Strategy</i> <input checked="" type="checkbox"/>	Paragraph: <input type="checkbox"/>	Map: <input type="checkbox"/>
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It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>	<input type="checkbox"/>		
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It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

No consultation about the building of new houses - in an a.o.n.b. where the impact would be horrendous both on services i.e. health, hospital etc, the huge population increase and such a blot on the landscape. Also the move of the Health Centre - is ridiculous - should stay central.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

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--	--	---

Please state the part of that document you are commenting on:

Policy : 6-5	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>

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It is not 'consistent with national policy'

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Comments:

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

Why increase the number of people who will need employment when there is such little opportunities for work.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	--	---

Please state the part of that document you are commenting on:

Policy : <i>Core Strategy</i>	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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i.e. comments on the process of preparing Planning Purbeck's Future

Yes	No	No Comment
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. (a) Sound
i.e. comments on the content of Planning Purbeck's Future

Yes	No	No Comment
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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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)

There are far too many second homes in Swanage, perhaps this is an area that should be looked at, it would keep the price of property more affordable to local families,



Purbeck District Council
 Local Development Framework (LDF)
 'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
 Representation Form (Nov/Dec 2010)

	Your Details	Agents Details (where relevant)
Title	Mr and Mrs	
Name	Angela and Timothy	
Job Title (where relevant)		
Organisation (where relevant)		
Address	83 Corfe Rd. Stoborough	
Postcode	BH20 5AY	
E-mail	atsalterandfamily@btinternet.com	
Tel. Number	01929 550011	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

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- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm in the District Council offices, Wareham

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For further information, visit http://www.dorsetforyou.com/purbeck_consultation, email or call 01929 557273 to speak to a member of the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

After this stage, further submissions will be only at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination.

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. 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 ask questions as per attached

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

Signature Angela salter

Date 19.12.10

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>).</i>	<input checked="" type="checkbox"/>		
It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

----- Original Message -----
 From: TIMOTHY SALTER
 To: ldf@purbeck-dc.gov.uk
 Sent: Sunday, December 19, 2010 3:23 PM
 Subject: Fw: Purbeck Consultation Wareham

Subject: Purbeck Consultation Wareham 'Planning Purbeck's Future'

We are writing to give some written comments re the consultation.

We note that although the 'Planning Purbeck's Future ' does not now specifically support a supermarket your data and evidence base has not been changed and also there are many rumours flying around Wareham about how you are still proposing to use the Wareham Middle School site as a supermarket despite the large

public opposition to such a scheme.

We have looked in detail at the proposals and the likely impact on Wareham

I note that The Draft Retail Impact Assessment 1.7 notes a general sentiment against a foodstore and that traders are concerned about the impact of a new foodstore on both the character of Wareham and the existing retailers in the town centre. There are also many concerns re sale of non food items in any potential new supermarket. and 1.12 The baseline level of convenience shows there is more need in Swanage than in Wareham with an extension of the Swanage supermarket having a low impact. 1.23 a new store in wareham would leave town centre convenience stores trading at below benchmark levels.

These conclusions and the information we have gleaned from talking to countless people on 4 Saturday mornings in June/July lead us to ask you not to inflict a large supermarket on Wareham. Many people within the town and local area are extremely concerned about the effect such a store would have on the town. People are also concerned that the current Sainsbury's sells an inferior range of goods than the previous Somerfield in the same floor space.

We also spoke to many people visiting Wareham from up and down the country who told us what had happened to the local shops in their town when a supermarket was inflicted on it. Shops closing and traders going out of business. There was only one exception somewhere in Scotland where everyone boycotted the new supermarket.

Even with restrictions as in 1.25 I do not see that this would be kept too and would be flouted by any large supermarket.

The Middle School site I would envisage not becoming available as I do not see how Purbeck School will get enough funding to rebuild or extend on it's current site.

I am also concerned that having attended Wareham Town Council meetings in June and July where these are open to the public that Wareham Town Council has been quoted as supporting option A when it has only recently made a decision and resolution on 21.7.10 to support option C WITHOUT THE SUPERMARKET.

I presume that quoting the Town Council wrongly in your consultation leaflet is a serious matter and will have led many people to wrongly interpret the Town council view. I have already asked you for an explanation of this.

Previous studies include the following:

Early 1990's a Supermarket was proposed off the Wareham by-pass at Worgret. The planning inquiry ruled the proposals would have a damaging effect on the vitality of this historic town centre.

In 1998 Government commissioned independent research said "this research firmly establishes that out-of-town superstores can seriously damage the health of small towns".

In 1999 independent retail consultants appointed by the District Council firmly advised against out of town supermarkets which would be likely to have a seriously detrimental effect on Wareham Town Centre.

In 2001/2 a planning inquiry took place and the Inspector concluded "I am wholly with the Council in its opposition to supermarket development at Worgret Road.... Small market towns with a relatively weak foodstore provision are particularly vulnerable to out-of-centre supermarkets ... Wareham would be best served by an extension to the existing town centre stores."

A new 20,000 sq ft out of town supermarket at Wareham is never going to compete with the Tesco Extra at Fleets Bridge or Asda at Poole - just 15 mins away by car.

The current consultants predict that a quarter of trade would be taken from the recently opened town centre Sainsbury's, and recognised that it could close. They also acknowledge that the impact of the out of town supermarket proposals could affect up to 74% of shops selling goods in Wareham. This will result in Wareham becoming a ghost town!

The new Government has abolished Regional Spatial Strategy (RSS) on which these proposals are based.

The Council has invited our views on three options: a large Supermarket in Wareham: a large

Supermarket in Swanage, or medium sized Supermarkets in Wareham and Swanage They ignore the fourth option - which is what Wareham Town council have just voted for and that is no supermarket.

We would support the view of the Town Council option C without the supermarket. I think we need some additional housing and splitting this to 2 sites is a better idea.

I hope that you will consider the previous assessments and also give people a proper choice as your current consultation paper does not readily give people the option of refusing the supermarket and also publicly misquotes the Town Council.

Regarding renewable energy we are pleased that PDC decided at the recent public meeting to support the application for windmills at Masters Quarry on Puddletown Rd. If we are to get anywhere near the 20% proposed by 2020 then you must surely support all such schemes within reason in order to achieve even a fraction of this. I would like to see the general scheme Local Energy plan as proposed in section 8.16.4

Angela and Timothy Salter 83 Corfe Rd Stoborough Wareham

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Scott A



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

SS03
20/12/10

Your Details	Agents Details (where relevant)
Title	
Name	ALBERT A. SCOTT
Job Title (where relevant)	Retiree
Organisation (where relevant)	
Address	383 West St Swanage
Postcode	BH19-2NT
E-mail	
Tel. Number	426517

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

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<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:

<i>Local knowledge after 50-60 yrs.</i>

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	Signature has been blanked out
-----------	--------------------------------

Date <i>11/12/10</i>

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy: ✓ <i>flex</i>	Paragraph: <i>7-5-4</i>	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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It is not 'consistent with national policy'	<input type="checkbox"/>		

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Very little consultation prior to notification. A.S.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

*Total lack of consultation
prior to any letter etc. A.S.*

Scott Estate

20 December 2010
Core Strategy response covering letter 20.12.10.doc

Planning Policy
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset
BH20 4PP

Cliff Lane
E. clifflane@savills.com
DL 144 0Q 1202 856301
T 144 0Q 1202 056901

Wessex House
Frons Walk
East Borough
Winton BA1 1EP
T 144 0Q 1202 856 300
savills.com

Dear Sir / Madam

Purbeck Core Strategy Pre-Submission Document – Consultation Response

Please find enclosed completed response forms and supporting information in response to consultation on the Purbeck Core Strategy Pre-Submission Document, submitted on behalf of the Scott Estate in relation to land east of Washpond Lane, Swanage.

I trust that the comments will be of assistance as you prepare the submission Core Strategy. Please do not hesitate to contact me should you wish to discuss any aspect of the consultation response.

Yours sincerely

Signature has been blanked out

Cliff Lane
Director

Encl Consultation response forms
Public Exhibition boards for Washpond Lane prepared by Savills, July 2010
Swanage – the future of healthcare provision, funding, commissioning and delivery report prepared by Prime, December 2010
Updated masterplan for Washpond Lane prepared by Savills, December 2010
Flood Risk Assessment & Surface Water Drainage for Washpond Lane prepared by Such Salinger Peters, December 2010

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or your local office. The information is for general information only and does not constitute an offer.



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
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Your Details		Agents Details <i>(where relevant)</i>
Title		Mr
Name		Cliff Lane
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	Scott Estate	Savills
Address	c/o agent	Wessex House, Priors Walk, Wimborne
Postcode		BH21 1UD
E-mail		clane@savills.com
Tel. Number		01202 856901

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

Briefings on how to complete these forms and the process involved will be held on:

- 10th November, 7pm in the District Council offices, Wareham
- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm in the District Council offices, Wareham

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 or call 01929 557273 to speak to a member of the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change

After this stage, further submissions will be only at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination.

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. 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:

The need to identify locations at Swanage to accommodate the current and future growth needs of the town is considered an issue of strategic importance that is fundamental to the overall soundness and deliverability of the Core Strategy. The Scott Estate landholding to the East of Washpond Lane, Swanage has been put forward as suitable for a mixed use development including open space, healthcare provision and new homes. The site was identified by the Council as being part a preferred option for development in the *Where Shall We Build in Purbeck?* consultation in June 2010, however it has not been taken forward as an allocation in the pre-submission Core Strategy for reasons cited by the Council as uncertainty over healthcare funding and a potential village green application. These reasons are refuted by the landowner and are addressed in our representations. We consider that the inclusion of the site as a strategic allocation in the Core Strategy is necessary for the plan to be considered sound and deliverable, and in our view would benefit from further consideration at the oral examination.

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

Signature	Signature has been blanked out	Date 20 December 2010
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: 5.6.2 – 5.6.3	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because: <i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>		<input checked="" type="checkbox"/>	
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>		<input checked="" type="checkbox"/>	
It is not 'consistent with national policy'		<input checked="" type="checkbox"/>	

(For explanation of terms refer to guidance notes below)

Comments:

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

The Core Strategy only considers the Settlement Extensions that require changes to the Green Belt to be strategic, with all other settlement extensions passed down to the Site Allocations Plan. There is no strategic development plan policy requiring a review of Green Belt boundaries in these locations, and we consider that the selection of strategic allocations for inclusion in the Core Strategy should take into account wider issues such as the size of the settlement extension, its location, and the mix of land uses proposed.

The development strategy proposed in the Core Strategy is based on a narrow interpretation of what constitutes strategic and does not provide a deliverable or flexible plan. A consequence of this approach is that the first five years of housing supply in the Core Strategy is heavily reliant on a small number of sites that are currently within the Green Belt. This approach does not reflect housing needs across the majority of the District which lies outside the Green Belt, it does not deliver a flexible or responsive supply of land as required by PPS3.

In the context of Purbeck District, with its acknowledged housing needs, environmental

constraints, and limited opportunities for new development, we consider that the location of a settlement extension at Swanage is a strategic consideration that requires an allocation in the Core Strategy.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Land at Washpond Lane, Swanage should be identified as a strategic allocation at paragraph 5.6.2. This will help to ensure that the settlement extension at Swanage is deliverable, and contribute to delivering a flexible, responsive supply of land for housing

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : Policy LD	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>(i.e. comments on the process of preparing Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>(i.e. comments on the content of Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because: <i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The inclusion of Swanage within the top tier of the settlement hierarchy and therefore as one of the most sustainable locations for development is fully supported; however Policy LD fails to provide any strategic guidance for the general location of development beyond the outdated Local Plan settlement boundaries.

Policy LD requires that new development is concentrated within existing Local Plan settlement boundaries, with land falling outside these settlement boundaries being classed as open countryside. The task of reviewing settlement boundaries is delegated to the Site Allocations Plan, which is not scheduled to commence until 2011, and is likely to take several years to adopt. This is at odds with the Housing Trajectory (section 6.3), which anticipates strategic sites to commence by 2013, and shows that the Core Strategy is entirely reliant on settlement extensions within the Green Belt for the delivery of new housing between 2013 and 2017.

A consequence of this is that the Core Strategy fails to address the immediate shortage of housing land in the District, does not provide a flexible and responsive supply of land for housing, and does

not identify a supply of specific, developable sites for at least 15 years from the date of adoption.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

In order to ensure that a flexible and responsive supply of land is available, and to make the clear spatial choices needed in the Core Strategy, Policy LD should include clear reference to the location of all of the settlement extensions that are needed to implement the plan, including land at Washpond Lane, Swanage.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: 6.2.1 – 6.2.3	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The approach to calculating Character Area Development Potential set out at paragraphs 6.2.1 to 6.2.3 has the effect of building a significant windfall allowance into the District's housing land supply. This is contrary to the approach to determining housing land requirements set out at paragraphs 58 and 59 of PPS3, which states that windfalls should not be included in the first 10 years of land supply.

The Core Strategy and the supporting evidence base does not provide robust evidence of genuine local circumstances that prevent specific sites being identified. Furthermore there is no testing of delivery to support the 47 dwelling per annum figure suggested in 6.2.3. Whilst we agree that uncertainty in the future housing market, fewer opportunities for infill and the impact of new affordable housing thresholds will significantly reduce the scope for future opportunities, we consider the 50% reduction applied to Character Area Potential still result in an unacceptably high proportion of the District's future land supply coming from unidentified sites.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The Council has not demonstrated robust evidence of genuine local circumstances that prevent specific sites being identified. As such there is no justification for including a windfall allowance in the housing figures and no allowance should be made for Character Area Development Potential. Section 6.2 of the Core Strategy should be deleted and the housing trajectory and supply tables updated accordingly.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: 6.3.1 – 6.3.4	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The housing trajectory set out at paragraphs 6.3.1 to 6.3.4 and the accompanying figure does not represent a flexible, responsive supply of housing to enable continuous delivery of housing for at least 15 years from the date of adoption, as required by PPS3: Housing.

The assumptions implicit in the table raise serious doubts about the delivery and implementation of the plan. The housing trajectory illustrates that 100% of the existing commitments will be completed by 2013, but, contrary to paragraph 58 of PPS3, there is no evidence to demonstrate that the sites are developable in the timescale envisaged. The proposed housing strategy relies on the small number of strategic settlement extensions to deliver 100% of the housing land supply in the critical period from 2013, but beyond the first 5 years, the housing trajectory relies on a high proportion of windfall and non-specific sites.

The approach does not incorporate any scenario or contingency planning to identify different delivery options in the event that actual housing delivery does not occur at the rate expected. The Core Strategy is reliant on a number of subsequent DPDs and SPDs to deliver the proposed

strategic allocations, and delays to any of these or during the application, site assembly and mobilisation/lead-in stages represents a significant risk to housing delivery.

Paragraph 6.3.3 suggests delivery on non-strategic sites will take place post 2016, whilst the table in Policy HS: Housing Supply indicates 50 units of housing coming forward as a settlement extension at Swanage in the period up to 2016. We consider that a strategic allocation at Washpond Lane, Swanage is needed as part of a flexible and responsive supply of land for housing, and to help ensure that there are sufficient specific, developable sites identified to underpin the delivery and implementation of the plan.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The housing trajectory illustrates serious delivery and implementation concerns with the proposed approach. A more balanced strategy can be achieved by bringing additional strategic allocations and specific sites into the housing trajectory, including the identification of land at Washpond Lane, Swanage as a strategic site.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : Policy HS: Housing Supply	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2 (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>).</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(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 HS: Housing Supply is not considered to be consistent with PPS3 for the following reasons:

- The level of housing provision set out is contrary to paragraphs 32 and 33 of PPS3 as it does not take account the evidence of current and future need and demand for housing and affordability levels, the availability of suitable land for housing as identified in the SHLAA, and overall Government ambitions to increase housing supply and improve affordability.
- The policy fails to make sufficient suitable land available to ensure that the overall housing provision can be met, contrary to paragraph 52 of PPS3;
- The policy does not identify broad locations or specific sites to enable continuous delivery of housing for at least 15 years from the date of adoption, contrary to paragraph 53 of PPS3;
- The policy fails to identify sufficient deliverable sites for the first five years from adoption, contrary to paragraph 54 of PPS3;
- The policy fails to identify a further supply of specific, developable sites for years 6-10 and

- 10 -15, contrary to paragraph 55 of PPS3;
- There is no mechanism within the policy or elsewhere in the plan to manage supply of land to ensure a continuous supply of deliverable sites is maintained, contrary to paragraphs 57, 60, and 61 of PPS3;
- There is insufficient evidence to demonstrate that existing commitments will be delivered within the timescale envisaged, contrary to paragraph 58 of PPS3;
- There is a significant windfall allowance incorporated in the first 10 years of land supply, contrary to paragraph 59 of PPS3
- There is no evidence of contingency planning or risk assessment to identify different delivery options and management strategies to ensure housing delivery occurs at the rate expected, contrary to paragraph 62 of PPS3;

Furthermore, the policy is not considered to be justified or effective as the overall level of housing provision fails to meet the needs of the area as indicated by the evidence provided in the latest CLG household projections, the Housing Market Assessment, the Housing Needs Survey, and number of households on housing register. The latest CLG household projections show that the number of households in Purbeck is forecast to rise by 4,000 over the plan period. The number of people on the housing register has reached over 1,600 and is growing year-on-year. The Council's Housing Market Assessment forecasts the future housing need for Purbeck at over 400 households per year. Against this context, the Core Strategy would have the effect of reducing housebuilding in Purbeck to 80 homes per year in the latter part of the plan period – this would be the lowest for over 20 years, and will result in problems of overcrowding, sub-standard housing, social exclusion, homelessness and out-migration of younger people and families.

The policy is not flexible as it relies on a small number of sites that are currently within the Green Belt and does not identify sufficient specific sites elsewhere to ensure the delivery of the Core Strategy objectives in relation to housing provision.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

In order to be considered sound, the overall level of housing provision should be increased in line with identified housing needs. Additional strategic allocations and specific sites should be identified within the housing supply, including the identification of Washpond Lane, Swanage as a strategic site.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: 7.5.8	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The Vision for South East Purbeck is supported. In particular the need to improve health and sports facilities, provide new family housing, affordable housing and extra care housing and provide new green space alongside new development are considered important aspects of the vision.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : Policy SE: South East Purbeck	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

Housing supply needs in South East Purbeck

The first paragraph of Policy SE: South East Purbeck states that around 900 dwellings are needed to meet housing supply needs from 2006-2026. This statement is considered inaccurate; the Core Strategy is proposing 900 dwellings for this area, but in reality the housing needs are much higher. The number of households on the Housing Register in South East Dorset is currently 954 (p17 of the Core Strategy), and the Survey of Housing Need and Demand for Purbeck District Council (Fordham Research, 2008) forecasts a future need for affordable housing in the Swanage area of 129 households per year.

Location of development within South East Purbeck

Policy SE: South East Purbeck identifies the settlements of Swanage, Corfe Castle and Langton Matravers as the focus for service provision. It is noted elsewhere in the Core Strategy that Swanage sits at the top of the settlement hierarchy as is considered one of the most sustainable

locations for development in the District.

The Core Strategy does not provide for any extension of settlement boundaries at Corfe Castle or Langton Matravers, but does provide for a settlement extension at Swanage. The first two paragraphs of Policy SE should therefore acknowledge the different role that Swanage will play in meeting the development needs of the area compared to the other settlements in South East Purbeck

The third paragraph of Policy SE: South East Purbeck relates to Swanage. The need for settlement extensions to Swanage is fully supported, however given the constraints to development that exist around Swanage and the level of housing need in the area, we consider that the Core Strategy cannot be considered sound or deliverable without making specific reference to the location of the proposed settlement extensions and the inclusion of a strategic allocation at Washpond Lane, Swanage.

Strategic Allocation at Washpond Lane, Swanage

The Washpond Lane site was initially identified in the Council's Strategic Housing Land Availability Assessment 2009 (site ref. 6/20/0200) as available, achievable and suitable for development subject to the amendment of settlement boundaries, with an estimated potential for circa 100 homes in the period 2012-16.

The Council's Core Strategy Public Consultation Draft *Planning Purbeck's Future* published in September 2009 considered the issues and challenges facing Swanage, and set out at paragraph 3.8.5.9 a list of community and recreation needs for the area. The Scott Estate landholding at Washpond lane, in conjunction with the adjoining Swanage Middle School site and other Scott Estate and local authority landholdings in the immediate vicinity of the site, has the potential to make a substantial contribution to community and recreation improvements identified, including:

- Swanage Children's Centre and childcare provision
- New site for combined community hospital, medical centre and ambulance station
- More adult care and sheltered housing
- Community and multi-function centre to develop learning facilities
- Improved Day Centre
- Improved transport facilities
- Greenspace to reduce visitor pressure on Hartland Moor and Godlington Heath
- More allotments
- Sports centre with indoor sports hall
- Multi Use Games Area / Synthetic Turf Pitch
- Improved quality of footpaths, cycle route and bridleways

In response to the *Planning Purbeck's Future* September 2009 consultation, Savills, on behalf of the Scott Estate, submitted representations setting out the site's development potential, including indicative site layout and access plans. An illustrative masterplan was prepared to highlight Washpond Lane's potential developable areas, mix of uses and retained open spaces. This was supported by a site access plan prepared by Traffic consulting engineers Upton McGougan showing an indicative location for the site access and the approximate landtake for an appropriate roundabout design.

The Washpond Lane site was subsequently identified in Purbeck District Council's *Where shall we build in Swanage?* consultation in June 2010 as one of four possible future development sites at Swanage, with the Council's preferred option being a combination of development at Washpond Lane (Site B, 100 dwellings) and the former Grammar School (Site D, 100 dwellings). At that time, the Council considered that the Washpond Lane site could accommodate 100 dwellings, together with community facilities, including an integrated community hospital.

On the Estate's behalf, representatives from Savills and specialist healthcare developer Prime attended a consultation event hosted by Purbeck District Council at the Mowlem Centre, Swanage on 8th July 2010. Savills and Prime presented a set of 4xA1 display boards which included a site assessment and a preliminary masterplan outlining the opportunity for a mix of housing, public open space, healthcare provision, and community facilities on the site. A copy of the display boards have been submitted alongside these representations.

Responses to the Council's consultation were analysed in the *Where shall we build in Purbeck – Consultation Results* report. The report notes at page 50 that the Council's preferred development option of sites B and D is the most popular amongst the respondents. Further analysis on page 51 of the report indicates 62% of all responses selected site B either solely or in combination with other sites. The postcode analysis on page 52 of the report notes that generally the preferred option, to develop sites B and D, is either mildly supported or mildly opposed throughout much of Swanage, but there are pockets of strong opposition in the areas very close to the proposed development sites.

The consultation response from the Dorset AONB Partnership preferred the option of development on sites B and D. In relation to site B, the consultation response notes that the site is well contained by the A351 and existing housing to the south, Washpond Lane and the school to the west, and the Swanage railway line to the north.

The consultation response from the Environment Agency noted some reservations in relation to site B due to part of the site lying in within flood zones 3 and 2. The area at risk of flooding covers only a very small part of the site, and is not proposed for development. A Flood Risk Assessment has subsequently been prepared, and demonstrates that the site can be developed with no adverse impact on existing or future 'on-site' and 'off-site' flood water levels, as referred to in the section on flood risk below.

The consultation response from Dorset Wildlife Trust suggests a need for further information and survey work in relation to ecology. A basic species assessment for the Washpond Lane site has since been undertaken by Dorset Ecology, and no significant constraints to development have been identified. The site is largely improved grassland divided by hedgerows of variable quality, with some small areas of wet flushed within grassland offering potential for improved biodiversity. The survey identified low potential for bats, reptiles, and great crested newts, no evidence of badger activity, and a very limited area of open ditch on the eastern boundary of the site that provided habitat potentially suitable for water voles. The report noted some potential to enhance the site for wildlife and to increase biodiversity, and in response, a number of modifications have been incorporated into the revised masterplan for land to the east of Washponds Lane, which has been submitted alongside these representations.

Following the consultation, a report by the Council's Planning Policy Manager was considered by Council members on 5th and 12th October 2010. In the officers' committee report it states:

- *The Environment Agency has raised some concerns over flood risk on parts of the site that needs further investigation through a flood risk assessment.*
- *A large number of local residents have also objected....*
- *They are also preparing to apply for village green status for the part of the site alongside the A351.....*
- *With uncertainty over healthcare funding and the village green application, it would be best not to allocate the site through the Core Strategy.*

As a result, Purbeck's members resolved not to deal with the allocation of Swanage's settlement extensions in the Core Strategy, but in a later planning document. The village green issue and uncertainty over health care funding appear to have been major reasons why this site did not go

forward as a strategic allocation in the pre-Submission draft of the Core Strategy. These issues are considered in turn as set out below.

Village Green

For the Council to make the decision not to take forward the Washpond Lane site as a strategic allocation based on a village green application which had not actually been made, let alone properly considered, with evidence from both sides being tested, appears to be flawed decision-making.

Whilst it is legitimate for the Council to give weight to residents' objections to the allocation of the site for housing, to give weight to the possibility of a village green application which may never be submitted is at best inequitable.

In giving any weight to the issue, the Council has not given proper consideration to the promoter's views on this matter.

Notwithstanding the absence of any formal application for village green status, the promoter has taken legal advice and evidence has been assembled. This shows that the land management and farming regime of the site clearly demonstrate that there are robust grounds for the rebuttal of any village green application, if one were made. Should an application for village green status of part of the potential site be made this will be strongly resisted. Detailed legal representation including witness statements demonstrating the management and use of the land will be provided. It should further be noted that the officer's report only refers to part of the site. The remaining part would not be subject to the possibility of village green status and may still be available for development.

It is wholly unreasonable, inappropriate, and counter to the promoter's rights to a fair hearing, that the Council has made a decision based on conjecture regarding the submission of a village green application on part of the site. The same could be said for the health care funding issue.

Despite the promoter's concerns over the Council's decision-making process, account has been taken of residents' comments on the open space issues. To that end, a revised masterplan has been prepared, which has regard to many of the comments that were made at the consultation stage, including the usability of open space provided on the site. More appropriate open space and access to it is now proposed, amongst other things.

The promoter is conscious of public opinion, however, the potential loss of greenfield land adjacent to urban areas, even though in this case it is in private ownership and farmed, invariably provokes objections in the locality. With the need to provide additional land for housing, a balance has to be struck between the legitimate concerns of those who live nearby and the requirement to provide the much-needed new dwellings.

Recognising local concern on this issue, the promoter wishes to establish a positive and constructive dialogue with the local community regarding their concerns and will work to that end in 2011.

Healthcare

In response to the concerns raised in the Council's 5th October committee report, specialist healthcare developer Prime has prepared a short report setting out the current situation in relation to the future of healthcare provision, funding, commissioning and delivery in Swanage, which is submitted alongside these representations.

The report summarises the reforms to the NHS brought in by the coalition Government, including the introduction GP commissioning consortia to decide local priorities for buying healthcare, and

notes that the Government has confirmed that the arrangements for reimbursing premises costs for providers of General Medical Services (GPs) and for GPs seeking to redevelop their practice buildings will not be altered within the White Paper.

In relation to primary healthcare provision in Swanage, the report notes that the Swanage Medical Practice has also confirmed their commitment to developing a modern fit for purpose primary care facility. There are many issues with the existing premises including:

- The building, which is more than 35 years old, no longer meets the requirements being placed upon it.
- It is not large enough to accommodate the current clinical staff and this is preventing the practice from offering more services.
- The practice has nine GPs but only eight consulting rooms and there are insufficient rooms to accommodate current staff, including some nurses and healthcare assistants.
- Some of the clinical rooms are too small and because of their age they fail to meet current infection control standards, for minor surgery, so this cannot be carried out on the premises, meaning patients have to travel elsewhere.
- It does not meet current Disability Discrimination Act requirements and it can be difficult for wheelchair users to access all services.
- Staff facilities are not adequate and many work in very cramped conditions.
- The building offers no possibility to increase the available space for working and/or storage as the age and design of the structure means the layout cannot be easily or cost effectively redesigned.

The current Primary Care Trust, NHS Dorset, has consistently confirmed its support for the improvement in primary care facilities for both the Swanage Medical Practice and the Community Hospital. As part of the Purbeck Core Strategy consultation process NHS Dorset sent a letter to the District Council advising of its support for the establishment of new primary care facilities on the Herston Fields land. They are now proposing to undertake public consultation around the provision of these services in the future however until that consultation is concluded they are not in a position to make any firm commitment on the future of the Community Hospital.

The formation of a Dorset wide commissioning consortia, which is a requirement under the White Paper, is ongoing with a view to the shadow consortia being in place during 2011. It will be the Commissioning consortia which will have the responsibility for approving new GP premises development. The lead GP for the Purbeck consortia of commissioning doctors, which will be a key partner in the Dorset commissioning consortia, fully supports the need for a new facility for the Swanage Medical Practice and they firmly believe that the proposed development will receive the approval of the new organisation.

In the recent spending review the coalition confirmed that NHS spending will rise in real terms from £103.8bn to £114.4bn and therefore funding for new premises is not considered to be at risk. Swanage Medical Practice is therefore confident that funding will be available for the development of their new premises.

Flood risk

A Flood Risk Assessment and Surface Water Drainage Viability report for Washpond Lane has been prepared by consulting engineers Such Salinger Peters and is submitted alongside these representations. The report concludes the majority of the site, including all of the area proposed for residential development, is comfortably above the level of the predicted 1 in 100 year and 1 in 1,000 year flood events, and that the site can be developed with no adverse impact on existing or future 'on-site' and 'off-site' flood water levels.

Summary

The potential concerns raised by the Council in relation to healthcare, village green and flood risk have been addressed in these representations as set out above. The Scott Estate's proposals for Washpond Lane can deliver significant community benefits including healthcare provision, public open space, allotments, community facilities, sustainable transport linkages, and much needed new homes including family homes and affordable housing. Land at Washpond Lane should be identified in the Core Strategy as a strategic allocation for new housing, public open space, healthcare and community facilities.

Documents submitted in support of this representation

The following documents are submitted alongside of these representations in support of a strategic allocation at Washpond Lane:

Public Exhibition boards for Washpond Lane prepared by Savills, July 2010
Swanage – the future of healthcare provision, funding, commissioning and delivery report prepared by Prime, December 2010
Updated masterplan for Washpond Lane prepared by Savills, December 2010
Flood Risk Assessment & Surface Water Drainage for Washpond Lane prepared by Such Salinger Peters, December 2010

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The first two paragraphs of Policy SE: South East Purbeck should be amended to read as follows:

In South East Purbeck, Swanage will provide the main focus for service provision, where new housing development will be managed through the extension of settlement boundaries to meet housing needs.

The settlements of Corfe Castle and Langton Matravers will provide the focus for service provision in the rural areas. Development outside settlement boundaries will be strictly controlled.

The following bullet point should be added under the section of Policy SE relating to the role of Swanage.

The role of Swanage will be supported through:

- *The allocation of a settlement extension at Washpond Lane, to include:*
 - *approximately 120 dwellings including affordable housing;*
 - *New open space to mitigate potential impacts on nearby heathland;*
 - *Contributions for transport and open space/recreation provision, including allotments;*
 - *Highway junction improvements;*
 - *Improvements to walking, cycling and public transport access to the site;*
 - *Provision of or contribution to new or improved community and education facilities;*
 - *The provision of health centre facilities including integrated primary care centre and community hospital, extra-care apartments and elderly care facility.*

As a consequence of the proposed change above, the second bullet point in Policy SE will need to be adjusted to refer to the remaining component of the 200 dwellings proposed in the Core

Strategy for Swanage, to be allocated through the Site Allocations Plan.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : Policy AHT	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>).</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The proposed tenure mix in policy AHT lacks sufficient flexibility and will be difficult to attain with the current economic climate and spending cuts. Government policy in relation to affordable housing is changing and a more flexible approach is required in order to ensure the Core Strategy remains consistent with national guidelines and initiatives.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Delete the percentage tenure mix requirements from Policy AHT.

Swanage - the future of healthcare provision, funding, commissioning and delivery

NHS White Paper – “Equity and Excellence: Liberating the NHS”

Since the election the coalition has moved quickly to implement a number of major NHS reforms in its white paper “Equity and Excellence: Liberating the NHS” which will have a significant impact on the healthcare landscape for years to come. It is anticipated that the vast bulk of these reforms will be implemented by April 2013. By way of summary the primary changes include:

- Scrapping Primary Care Trusts by 2013
- The abolition of Strategic Health Authorities by 2012
- Establishment of independent NHS Commissioning Boards which will decide the future regional governance arrangements by 2012
- Establish GP commissioning consortia by 2013
- From 2011 Commissioning Boards and GP commissioning consortia will be established in shadow form up

Perhaps the most significant shift in structure and culture is the creation of around 500 GP commissioning consortia that will decide local priorities for buying healthcare within a framework established by the NHS Commissioning Board. It is expected that improving local co-operation and communication between GPs will facilitate a more rounded local approach to care. Within this system it is hoped that membership of local consortia will trigger further conversations amongst themselves as to how they can improve their facilities through partnership.

One matter the coalition have confirmed is that the arrangements for reimbursing premises costs for providers of General Medical Services (GPs) and for GPs seeking to redevelop their practice buildings will not be altered within the White Paper.

Primary healthcare provision in Swanage

The Swanage Medical Practice has also confirmed their commitment to developing a modern fit for purpose primary care facility. There are many issues with the existing premises including:

- The building, which is more than 35 years old, no longer meets the requirements being placed upon it.
- It is not large enough to accommodate the current clinical staff and this is preventing the practice from offering more services.
- The practice has nine GPs but only eight consulting rooms and there are insufficient rooms to accommodate current staff, including some nurses and healthcare assistants.
- Some of the clinical rooms are too small and because of their age they fail to meet current infection control standards, for minor surgery, so this cannot be carried out on the premises, meaning patients have to travel elsewhere.
- It does not meet current Disability Discrimination Act requirements and it can be difficult for wheelchair users to access all services
- Staff facilities are not adequate and many work in very cramped conditions

- The Building offers no possibility to increase the available space for working and/or storage as the age and design of the structure means the layout cannot be easily or cost effectively redesigned

The current Primary Care Trust, NHS Dorset, have consistently confirmed its support for the improvement in primary care facilities for both the Swanage Medical Practice and the Community Hospital. As part of the Purbeck Core Strategy consultation process NHS Dorset sent a letter to the District Council advising of its support for the establishment of new primary care facilities on the Herston Fields land. They are now proposing to undertake public consultation around the provision of these services in the future however until that consultation is concluded they are not in a position to make any firm commitment on the future of the Community Hospital.

The formation of a Dorset wide commissioning consortia, which is a requirement under the White Paper, is ongoing with a view to the shadow consortia being in place during 2011. It will be the Commissioning consortia which will have the responsibility for approving new GP premises development. The lead GP for the Purbeck consortia of commissioning doctors, which will be a key partner in the Dorset commissioning consortia, fully supports the need for a new facility for the Swanage Medical Practice and they firmly believe that the proposed development will receive the approval of the new organisation.

In the recent spending review the coalition confirmed that NHS spending will rise in real terms from £103.8bn to £114.4bn and therefore funding for new premises is not considered to be at risk. Swanage Medical Practice is therefore confident that funding will be available for the development of their new premises



- Existing housing
- Existing employment area
- Public open space
- Existing planting
- Existing school site
- Proposed planting
- Proposed community / healthcare use
- Proposed housing area
- Equipped play area
- Proposed access
- Enhanced ecological corridor following existing water course
- New wetland habitat feature
- Retention of existing open setting to High Street with enhanced ecological corridor
- Retention and enhancement of existing public footpath link across the site
- Opportunity for linkages between healthcare, community, open space and educational facilities
- Opportunity for linkage to potential additional greenspace / allotments
- Opportunity for linkage to employment area
- Opportunity for linkage to potential additional greenspace and employment area
- Frontages of buildings set well back from High Street behind existing planting to retain open approach in to Swanage

North

NOT TO SCALE

December 2010



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details	Agents Details <i>(where relevant)</i>	
Title		
Name		
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Scott Estate	
Address	C/O Savills, Wessex House, Prior Walk, East Borough, Wimborne	
Postcode	BH21 1PB	
E-mail		
Tel. Number	01202 856800	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

Briefings on how to complete these forms and the process involved will be held on:

- 10th November, 7pm in the District Council offices, Wareham
- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm in the District Council offices, Wareham

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 or call 01929 557273 to speak to a member of the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

After this stage, further submissions will be only at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination.

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. 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
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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:

We have a significant interest in land at Wareham and we therefore consider it to be important that we are able to participate orally at the examination to expand on the comments we have made within this document.

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

Signature

Date 20 December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : RFS: Retail Floor Space Supply	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>			<input checked="" type="checkbox"/>
It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(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 is unsound as it does not take into account the evidence base in the form of Nathaniel Lichfield and Partner's Retail Impact Assessment (September 2010). This clearly demonstrates the need to provide a food store of 2,000 square metres to meet the needs of the District.

The Joint Retail Study for Christchurch, East Dorset, North Dorset and Purbeck published in 2008 indicated that there is a high level of people in Purbeck who shop predominantly in food stores outside the District and generally in Poole and Dorchester. The background paper volume 2 quantifies this and states that in Central Purbeck and Wareham "only 20% of residents do their food shopping within the town". The Retail Impact Study (September 2010) updates these studies and continues to identify a significant proportion of retail trade being lost from the District to Poole and Dorchester.

The 2010 Retail Impact Study recommends a new food store is allocated at Wareham in the LDF and that Wareham's relatively healthy town centre could sustain the potential impact of a new

foodstore in Wareham.

Paragraph 7.1 of Nathaniel Lichfield and Partners (NLP) 19 October 2010 statement notes that PPS4 is clear that simply because there is no town centre site this should not be used as a reason to not meet need. Likewise NLP concluded that they do not consider that a new 2,000 square meter foodstore would cause "significant adverse impact" on Wareham Town Centre.

The Core Strategy itself recognises that one of the main challenges facing Purbeck is "helping people access services and community facilities locally, including shops" (page 6) and part of the vision for Purbeck is to reduce the need to travel "by increased self containment and the concentration of employment, shops, services and community facilities"(page 9). In order to achieve this vision, the Core Strategy must promote a new food store for the district to reduce the dependency on the need to travel to stores at Poole and Dorchester. Providing the district with a new food store is a sustainable strategy that could help reduce this need to travel and improve social sustainability through access to greater choice within the District.

The spatial objective set out on page 9 also recognises the importance of improving accessibility to shops and services. It states that spatial objective 9 is to "provide an integrated transport system and better accessibility to services for everyday needs". We interpret this statement to include better access to daily and weekly food shopping and this would best be provided through a new large food store at Wareham.

The supporting text to policy RFS recognises that a new food store in Wareham would reduce the need to travel and that this has environmental benefits - but it would also have social benefits. Reducing the need to travel is a requirement of policy IAT (Improving Accessibility and Transport), which states that "improving the accessibility within Purbeck will be achieved through better provision of local services and facilities, which reduce the need to travel". Provision of a new food store is a local service / facility that would help achieve the aim of this policy, helping to reduce travel throughout the whole district to supermarkets in Poole and Dorchester.

Paragraph 6.7.3.2 sets out the Council's reason for not allocating a new food store to Wareham. It states that "an out-of town site would have a negative impact upon the character and setting of Wareham, plus potential to impact upon the economy of the town centre cannot be ruled out". However, the Council's own consultants report has concluded that they do not consider that a new 2,000 square metre foodstore would cause "significant adverse impact" on Wareham Town Centre. It is therefore unclear what evidence the Council is basing decision upon. Likewise, paragraph 6.7.3.2 continues, "in order to protect the local distinctiveness of Purbeck's market towns, no allocation for a food store will be proposed through the Core Strategy or subsequent Site Allocation Plan". Given the overwhelming evidence that supports the case for a new food store in the district it is not at all clear upon what basis the Council has made this decision and as such we consider this strategy / policy approach to be unsound due to lack of justification.

Policy RFS has failed to balance the qualitative need and the sustainability benefits demonstrated through the evidence base that could be achieved with a new larger foodstore in Wareham. PPS4 clearly sets out through policy EC2, the need to "positively and proactively encourage sustainable economic growth". Most of Purbeck falls outside 15 minutes travel time to a 2,000 square metre food store (paragraph 4.33, Retail Impact Assessment 2010) and most people shop outside the district, travelling to either Poole or Dorchester. In order for the Core Strategy to be found sound it needs to take into account the sustainability benefits of providing a site in Wareham for a new food store. Providing a large food store in the district would have a dual benefit of reducing the need to travel and reducing social exclusion by providing an opportunity to shop locally. This weight of clear evidence is not balanced against the desire of some local people to resist out of town shopping.

The evidence prepared by NLP is robust and credible. The Core Strategy has not adequately

taken this evidence base into account and cannot therefore be considered to be justified and therefore sound.

We would recommend policy RFS includes the provision of a food store up to 2,000sqm net floor space at Wareham.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

We would recommend policy RFS includes the provision of a food store up to 2,000sqm net floor space at Wareham.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : CEN: Central Purbeck	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

Policy CEN is unsound as it has not considered the qualitative need demonstrated in the Retail Impact Assessments undertaken by Nathaniel Lichfield and Partners for a 2,000 sqm food store at Wareham. The vision for Central Purbeck highlights that one of the priorities for Wareham is to "enhance the town's current role as a shopping centre for the District". In order for Wareham to be able to achieve this vision, the Core Strategy needs to take into account the evidence that demonstrates the requirement for a large food store..

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Based on the evidence in the NLP Retail Impact Assessment, we would recommend policy CEN includes the provision of a food store up to 2,000sqm net floor space at Wareham.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input checked="" type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : RP: Retail Provision	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

Policy RP is unsound as it does not take into account the evidence base. It needs to address the need to provide a 2,000sqm food store in Wareham that should also be provided through policy RFS and CEN.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The wording of the policy should be amended to take account of the need to provide a new food store outside the town centre. We would suggest the following:

"With the exception of the new food store at Wareham, retail development outside the defined town centres of Swanage and Wareham and the Local District Centre of Upton that adversely affects their vitality or viability will not be permitted."

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SD: Sustainable Design	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

We support the Council's approach to the achievement of sustainable design. However, the wording of the policy needs to be carefully written to avoid an undue burden on developers and allow flexibility. The policy current lists eight items that the Council "expects" new developments to demonstrate or achieve. We would suggest this part of the policy is re-worded as an aim as opposed to an expectation.

Bullet point six requires new development to meet targets for carbon reduction set out in national policy and building regulations. By its very nature, Building Regulations will require new development to achieve specific standards and this does not need to be necessarily repeated in planning policy.

Bullet point eight expects commercial development to achieve a Breeam 'very good' rating for industrial development or 'excellent' for commercial development. We would suggest that this bullet is rewritten so developers "demonstrate how they aim to achieve Breeam...".

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Reword the introductory paragraph to make it clear this is an aim of the Council not a requirement.

Delete bullet point six.

Bullet point eight should read: "Demonstrate how they aim to achieve a Breeam 'Very Good' rating or higher for new build industrial and commercial development up to 1,000m² (net) floor space, and as a minimum an 'Excellent' rating for larger developments".

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : DEV: Development Contributions	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2 (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(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 DEV is unsound as it fails to clarify the type of developments that will be affected by contributions sought. It is not clear why affordable housing / heathland mitigation contributions would be required for commercial, retail or industrial development.

Indeed it is not clear why policy DEV is required since it does not cover all contributions that may be sought from new developments, it fails to detail the type of developments expected to contribute, it will be replaced by various SPDs or is covered by other policies contained within the Core Strategy.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Provide more clarity or delete the policy.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input type="checkbox"/>	Sustainability Appraisal <input checked="" type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
---	---	---

Please state the part of that document you are commenting on:

Policy :	Paragraph: Whole Document	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input type="checkbox"/>
• It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The sustainability appraisal does not consider the provision of a new food store at Wareham. Without this allocation it is unclear how the Core Strategy will "help everyone access basic services, reduce the need to travel by car and encourage cycling, walking and use of public transport" (table 3.6). In the summary of objective in section 5.3 the Sustainability Appraisal states that the Core Strategy is "strong on accessibility and self-containment" yet the document does nothing to address the fact that a large part of the District is beyond 15 minutes drive of a supermarket and fails to consider the evidence base (NLP Retail Impact Assessment) that identified a need to provide a new supermarket of 2,000 square metres at Wareham.

The appraisal of policy CEN indicates that new development at Wareham will "help support the viability of existing, and encourage the location of new, businesses such as retail". This statement needs further justification given that the policy CEN does not allocate a new foodstore to Wareham.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The sustainability appraisal requires amendment to include consideration of option for a new supermarket in Wareham. It also needs to justify its current conclusions that indicate the Core Strategy will improve accessibility and self containment even though it does not provide for a supermarket for which a need was identified in the evidence base.

Note: Additional sheets can be downloaded from the website and submitted alongside this form.



Purbeck District Council
 Local Development Framework (LDF)
 'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
 Representation Form (Nov/Dec 2010)

Your Details

Agents Details (where relevant)

Title	Mr	
Name	Robert Seal	
Job Title (where relevant)		
Organisation (where relevant)		
Address	21 Beach Gardens, Swanage	
Postcode	BH19 1PG	
E-mail	scal.robert@yahoo.co.uk	
Tel. Number	01929 421228	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

Briefings on how to complete these forms and the process involved will be held on:

- 10th November, 7pm in the District Council offices, Wareham
- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm in the District Council offices, Wareham

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 or call 01929 557273 to speak to a member of the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

After this stage, further submissions will be only at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination.

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. 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

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:

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

Signature	Signature has been blanked out
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Date 19/12/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SE	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input type="checkbox"/>
• It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The amount of housing proposed for South East Purbeck cannot be supported by the local infrastructure. Swanage is a town at the end of a cul de sac (A351). During the 2009 consultation the Highways Agency objected to the option that focused housing being built in Swanage. When the 2009 Consultation took place only 8.9 % of the replies favoured concentrated growth in Swanage. This consultation has been ignored by Purbeck Council who only seem to read into the figures they want to see and hear.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Development of housing should be more spread around the whole district rather than concentrated in Swanage. Although there has been some spreading there is still too high a concentration in Swanage.



4041
20/12/10

Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details	Agents Details (where relevant)
Title	MR & MRS
Name	ROCKY SEAMAN NAIMIN SEAMAN
Job Title (where relevant)	
Organisation (where relevant)	
Address	57, QUEENS RD SWANAGE BH19 2EW
Postcode	BH19 2EW
E-mail	
Tel. Number	01929 428780

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm, District Council offices, Wareham

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You should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

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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. 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
--	---

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	Signature has been blanked out	Date 11/12/10
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : S.E.	Paragraph: 7 8,9	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>	<input type="checkbox"/>		
It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>	<input type="checkbox"/>		
It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

The consultation at no stage offered a choice of no new builds nor any clear explanation of the need for new homes.
John Prescott has gone to why proceed blindly with central govt dictat.
The basis of this plan for 900 houses has not been justified.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Would be best to re-start process as it applies to Swanage so that the Council could openly engage with local residents to assess the need for a timing of new house building. This would draw out ~~the~~ ^{Swanage's} need for re-generation & development. In this way a more organic & sounder planning framework could be established. If jobs are created housing can be provided in response to demand. Some limited early provision would be necessary.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : E65 H5	Paragraph: 6.5 6.2.4	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>(i.e. comments on the process of preparing Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>(i.e. comments on the content of Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>	<input checked="" type="checkbox"/>		
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>	<input checked="" type="checkbox"/>		
It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

- New jobs identified seems to be a long way from Swanage (the "end de sea").

- There is very limited space or brown field ground in and around Swanage if adverse impact upon natural environment is to be avoided.

- Houses built in Swanage, in the absence of new jobs, end up as 2nd homes or prices are pushed up even higher (a vicious circle).

100

8

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Put new housing, if need proven, near to areas where job growth is identified.

Go back to drawing board.

Ask basic questions & engage more thoroughly with local people & town & parish councils.

5779
20/10/10



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

	Your Details	Agents Details (where relevant)
Title	MISS.	
Name	LARAINÉ SMITS	
Job Title (where relevant)	RETIRED.	
Organisation (where relevant)	/	
Address	375 HIGH STREET SWANAGE.	
Postcode	BH19 2NP.	
E-mail	SMITSLAR@btopenworld.com.	
Tel. Number	01929 427487.	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

Briefings on how to complete these forms and the process involved will be held on:

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- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm, District Council offices, Wareham

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

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You should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

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<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
--	---

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	Signature has been blanked out	Date 16 Dec 2010.
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	--	---

Please state the part of that document you are commenting on:

Policy : SE	Paragraph: 7.5.9.	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant
*i.e. comments on the **process** of preparing Planning Purbeck's Future*

Yes	No	No Comment
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. (a) Sound
*i.e. comments on the **content** of Planning Purbeck's Future*

Yes	No	No Comment
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The people were not consulted regarding the amount of 200 houses on any settlement extensions in Swanage. We were given no chance to even choose if we wanted fewer houses or even no more houses at all.

Proposed Changes: ✓

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

It seems to me that Swanage has certainly adequate housing for those one here, there is not work for an in, like of people, no jobs & most property seems to be owned by second home owners. Why not build affordable homes in such areas as Holton Heath etc where there is work to be found - Some affordable Houses is needed in Swanage!

South West RSL Planning Consortium



Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL

T. 0117 9561916 E. all@tetlow-king.co.uk
F. 0117 9701293 W. www.tetlow-king.co.uk

Date: 17 December 2010

Our Ref: JAS M5/0109-08

Your Ref:

Planning Policy
FREEPOST RSAX-LTRK-TRKE
Purbeck District Council
Westport House
Worgret Road
WAREHAM
Dorset
BH20 4PP

By e-mail and post: ldf@purbeck-dc.gov.uk

Dear Sir / Madam

RE: PLANNING PURBECK'S FUTURE: CORE STRATEGY PRE-SUBMISSION CONSULTATION – NOVEMBER 2010

We represent the South West RSL Planning Consortium which includes all the leading Registered Social Landlords (RSLs) across the South West. Our clients' principal concern is to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

Our comments on the draft Core Strategy are therefore as follows:

2 – Characteristics of Purbeck

We note that the largest growth in the population of Purbeck will come from those over 50. It will be extremely useful if the Council could provide the demographic information on the growth of the over 80s in the district in the next twenty years. This would underline the need for more care and accommodation for the elderly in the district.

We note in paragraph 2.4 that in 2005 the district had the 15th highest house price to income ratio.

3 – Issues and Challenges

We note the issues and challenges set out in this section. In particular we consider the below to be the most important:

- *Optimise the provision of affordable housing*
- *Reduce the disparity between low local wages and high house prices*
- *Respond to the changing demographic make up of the District*

We also support the Council in making 'Providing housing people can afford' the top priority for the district.

Tetlow King Planning Limited Part of the Tetlow King Group
Registered Office Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL Registered in England No. 2165802
Government Approved Constructionline Registered No. 8559

Directors
R S Tetlow BA HSE Dip Surv FRICS FCIM FRS
S Huxley BA BSc MSc
J M Adams BA (Hons) BIP MSc
J Smedden BSc (Hons) MSc
Associate Director
J Stacey BA (Hons) Dip TQM

4 – Vision and Spatial Objectives

Vision for Purbeck

We recommend that reference to meeting local needs first in the vision is removed. The definition of 'local' in this context is unclear. Is this local to specific settlements or the district as a whole? In either case it is not realistic to expect to do either without putting onerous restrictions on new dwellings.

8 – Development Policies

Policy AHT: Affordable Housing Tenure

In the previous round of consultation on this document we raised concerns over the 90% social rented requirement. We understand that there is an overwhelming need for this type of product, but on larger sites this will not deliver mixed and balanced communities.

This could also be a problem if Registered Providers bring forward their own medium sized sites which could be 100% affordable housing, on these occasions 90% social rented housing will not be desirable. It would be helpful if the Council could clarify if this policy will apply to sites brought forward by Registered Providers, perhaps during the examination process.

Given recent ministerial announcements on the provision of 'Affordable Rent', the outcome of the Comprehensive Spending Review and the content of Localism Bill and A Fairer Future of Social Housing we consider that there is more emphasis on providing intermediate housing products in the future. As the landscape is changing dramatically it may even be better to set the tenure split in an SPD on Affordable Housing.

Finally, the Viability Assessment produced by Three Dragons uses a tenure split of 75% social rented and 25% Homebuy. It has not tested a 90% requirement and given the extremely high targets for affordable housing this may not be viable. We therefore recommend that the policy is amended as below to ensure it is underpinned by a robust evidence base.

Affordable housing provision tenure will be negotiated on a site-by-site basis to reflect identified local need and viability, but is likely to be split as follows:

- *90 75% Social Rented Housing*
- *10 25% Intermediate Housing to Rent or Purchase*

Policy AH: Affordable Housing

We note the Council's proposed affordable housing target and thresholds. We support the Council in attempting to set the highest levels of affordable housing possible, but the methods to do so must be practical. For example, we would like to see the Council increase the threshold to four or five dwellings, or three at the very least. We consider that below this level the strain on officer time will be too great too and the returns too few. We consider that officer time would be better spent negotiating higher levels of affordable housing on the biggest schemes.

Furthermore, this threshold will deliver individual affordable dwellings which will cause the residents to feel isolated and excluded within high specification developments. Our proposed four or five unit threshold would deliver at least two affordable dwellings in each new development.

The viability assessment makes repeated reference to example of affordable housing thresholds being removed at Bournemouth. Our understanding is that the implementation of this policy has been fraught with difficulties, as anticipated in the representations made by the consortium.

The assessment does not make it clear if they have tested the different thresholds in different parts of the district or if a threshold of two has only been tested once.

With regards to affordable housing targets, the viability assessment and level of need would appear to support 40% and 50% across the district. However, this was also the case in South Hams where they set a 50% target and it has rarely been achieved since the target was adopted.

The viability assessment also states that the targets will not always be viable and will '*need to be applied flexibly*'. We therefore recommend that the policy does not set 'minimum requirements', but instead use these as targets which are starting points for negotiation. This is particularly important as the assessment acknowledges that the 40% requirement is not viable in Upton and the 'Rural Centre'.

The policy also requires developers to pay for local authorities to get viability assessments independently verified. This is an unnecessary expense and could delay the processing of applications. We suggest that the Council merely state that the assessment be carried out by an appropriate and independent assessor within parameters agreed with the Council.

Finally, the Council may want to consider allowing all of the affordable housing to come forward at the start of the development on stalled sites. This would bring forward the affordable housing faster and offer some cross subsidy to the developer.

We therefore recommend that the policy is amended as below:

Developments of 2 or more dwellings, or a site area of 0.05 hectares or more will be required should aim to provide a significant affordable housing contribution. The below targets will be considered the starting point for negotiation:

- *At least 50% in the Swanage and Coast sub-market areas*
- *At least 40% elsewhere*

Policy RES: Rural Exception Schemes

We generally support this policy, but consider that the restriction that it will only apply to settlements under 3000 people and only to small scale developments should be revised. Applying the rural exception principle more widely could allow for the supply of more affordable housing in the district.

We also consider that given current public funding climate, it will be difficult to bring forward schemes that are solely for social rented properties. The lack of social housing grant means that new and innovative ways of delivering these types of these schemes is required. This may mean cross-subsidy of social rented schemes with open market housing. The supporting text should be amended accordingly.

The Needs of Different Household Groups

We support the inclusion of these paragraphs (8.7.1 – 8.7.2), but consider that they should be promoted to policy status given the high need for elderly care and accommodation in the district. The list of care solutions should also be expanded to include Continuing Care Retirement Communities (CCRCs) which are a successful and popular care solution for many elderly people.

Policy GI: Green Infrastructure, Recreation and Sports Facility

This policy requests that all new developments provide Green Infrastructure, however this does not allow officers to take in to account existing provision in the locality of the development site. Mitigation measures

or new provision should only be required where the development would create a shortfall in Green infrastructure in the local area.

Policy SD: Sustainable Design

The use of the term 'enhancement of context' is very vague and suggests the need to improve land around a development site, which would be unreasonable where the applicant does not own that land.

We are generally supportive of attempts to make new homes more adaptable to the future needs of residents. However, the car parking requirements of the Lifetime Homes Standard is extremely land intensive and can reduce the overall number of units that can be provided on site. We would therefore recommend flexibility to meet different parts of the standard in this policy.

Furthermore, Housing Minister Grant Shapps MP has announced that the HCA will abandon the new standards for affordable housing they were working on. The Government has yet to announce what will replace these but it is expected that local authorities will be required to ensure that both public and private housing meets the same standard. We recommend that the Council awaits the announcement of these before setting its own standards.

The above comments are intended to be constructive. We would like to be consulted on further stages of the SPD; please ensure that the South West RSL Planning Consortium are retained on the LDF database, with Tetlow King Planning listed as their agents.

Yours faithfully

Signature has been blanked out

ff

JAMIE SULLIVAN
For and On Behalf Of
TETLOW KING PLANNING

Enc.: Response Form

cc: Knightstone Housing Association
Raglan Housing Association
Spectrum Housing Group
Synergy Housing Group

Fiona Brown



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details		Agents Details (where relevant)
Title		Mr
Name		Jamie
Job Title (where relevant)		Sullivan
Organisation (where relevant)	SW RP Planning Consortium	Tetlow King Planning
Address		Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol
Postcode		BS5 0JA
E-mail		All@Tetlow-king.co.uk
Tel. Number		0117 9561916

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

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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. 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
--	---

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 adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature Jamie Sullivan

Date 17/12/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	--	---

Please state the part of that document you are commenting on:

Policy : Characteristics of Purbeck	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because: <i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input type="checkbox"/>
It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input type="checkbox"/>
It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

See attached letter

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
---	--	--

Please state the part of that document you are commenting on:

Policy : Issues and Challenges	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

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Comments:

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
---	--	--

Please state the part of that document you are commenting on:

Policy : Vision for Purbeck	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
(tick all that apply)			
<ul style="list-style-type: none"> • It is not 'justified' (i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy) <input type="checkbox"/> • It is not 'effective' (i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>) <input checked="" type="checkbox"/> • It is not 'consistent with national policy' <input checked="" type="checkbox"/> 			

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : AHT	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>		<input checked="" type="checkbox"/>	
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>		<input checked="" type="checkbox"/>	
• It is not 'consistent with national policy'		<input checked="" type="checkbox"/>	

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Comments:

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See attached letter

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : AH	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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<ul style="list-style-type: none"> • It is not 'justified' (i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy) 			<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • It is not 'effective' (i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>) 			<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • It is not 'consistent with national policy' 			<input checked="" type="checkbox"/>

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : RES	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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See attached letter

Note: Additional sheets can be downloaded from the website and submitted alongside this form.

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: 8.7.1 - 8.7.2	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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---	--	--

Please state the part of that document you are commenting on:

Policy :	Paragraph:	Map:
GI		

Do you consider Planning Purbeck's Future (Core Strategy) to be:

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SD	Paragraph:	Map:
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2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

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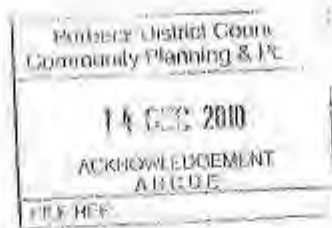
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See attached letter

Spindler D & A

5393
14/10/10



Andos
68 D'Urberville Drive
Swanage
BH19 1QW

09 December 2010
Steve Dring planning policy manager
Purbeck District Manager
P.D.C. Wareham

New Home Building in Swanage

Dear Sir,

I write once again as a resident for over thirty years to ask the council to have second thoughts, we do not want any more development, our town does not have the services to cope. Even now the Dr's are needing more space for the existing populace!

Do not permit any development on the grammar school site. You only have to visit Northbrook road after a long period of heavy rain to see that the road is flooded in the dip. If the green field site is covered then extensive flooding will occur. I know a risk assessment has been carried out but having once been flooded many years ago in the mole valley before the Thames barrier was built we all know that flooding of D'urberville Drive will occur. Most residents like me are over eighty have served our country and survived.

We just do not want more residents in Swanage the town does not have the services to cope. Even now car parking is difficult. The Dr's can hardly cope, the dentists list is full No more please.

Yours Faithfully

Donald & Anne Spindler

Signature has been blanked out



Purbeck District Council
 Local Development Framework (LDF)
 'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
 Representation Form (Nov/Dec 2010)

	Your Details	Agents Details (where relevant)
Title	Mr	
Name	Martin Drennan	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
Address	Ashlands House North Street Crewkerne Somerset	
Postcode	TA18 7LQ	
E-mail	martin.drennan@sportengland.org	
Tel. Number	020 7273 1847	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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--	---

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Signature

Date 9/12/10

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	--	---

Please state the part of that document you are commenting on:

Policy : GI: Green Infrastructure, Recreation and Sports Facilities	Paragraph:	Map:
--	------------	------

Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
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It is not 'consistent with national policy'		<input type="checkbox"/>	

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Comments:

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Sport England notes that the evidence base for the Core Strategy, and in particular policy (GI), includes a comprehensive PPG17 Sport and Recreation Audit and Assessment which covers all the main types of recreational open space and indoor sports facilities. Whilst we welcome the production of this audit and assessment, it is now some five years old and in need of updating. However, we also note from para 8.11.5 that the Council is currently preparing a Recreation Strategy that will up date the 2005 Recreation Audit and Assessment. We would urge the Council to progress with this work as a matter of priority, in order that the forthcoming Recreation and Open Space Contributions SPD is based on up to date and robust information in relation to existing and future needs for sports facilities.

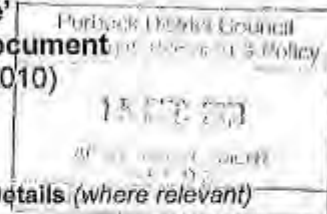
Proposed Changes:

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5572
15/12/10



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)



	Your Details	Agents Details (where relevant)
Title	Mr.	
Name	B. Stephenson	
Job Title (where relevant)		
Organisation (where relevant)		
Address	April Cottage T9 lobe Close Swanage	
Postcode	BH19 2RF	
E-mail	bstephenson@talktalk.net	
Tel. Number	07748421812	

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<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
--	---

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	Signature has been blanked out
-----------	--------------------------------

Date 12.12.10

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SE: South East Purbeck	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input type="checkbox"/>
It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The Infrastructure of Swanage cannot accommodate the proposed increase in housing. The current population of 10,000+, rises to over 40,000 in the summer which results in severe road congestion. Many residents travel outside the area for employment as job opportunities are restricted.

The new local structure for education will increase the numbers of children being transported daily to Wareham for secondary education in addition to local business people.

The proposed development of new dwellings would be better suited to a large scale development at Holt Heath which has a railway station and abundant employment.

I would suggest that this would provide appropriate support for the local existing population.

I find it extraordinary and unbelievable that it is being considered to turn this special town, loved by so many into a densely populated area.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Delete the settlement extensions for Swains and the Purbecks. & replace them with a development at Holton Heath.

Studland Parish Council

From: Dorset For You[SMTP:WEBMASTER@DORSETFORYOU.COM]

Sent: Monday, December 20, 2010 12:43:26 PM

To: email-LDF

Subject: Form submission from article Planning Policy Team on www.dorsetforyou.com

Auto forwarded by a Rule

Online Form Submission

Form [Emailcontact](#) (58259)

Article [Planning Policy Team](#) (396217)

If you do not have access to your usual email account, for example if you are accessing this web site from a library or internet café, you can use the form below to email us.

Your Name Studland Parish Council

Your Email Address alanleeson@msn.com

Studland Parish Council believes that any proposals to increase substantially the number of dwellings in Swanage to be inappropriate based evidence that is fundamentally flawed. This by virtue of the fact that the options provided as part of the consultation did not provide a 'nil increase' choice.

Comments/questions The Council consider that due regard be taken to the lack of employment opportunities afforded to those anticipated to occupy any new housing provisions. The Council opposes any proposals that lead to a significant increase in traffic using the A351 through Corfe Castle and the B3351 though the parish of Studland.

Studland Parish Plan



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details	Agents Details <i>(where relevant)</i>	
Title	Mr	
Name	Bowyer	
Job Title <i>(where relevant)</i>	Chairman	
Organisation <i>(where relevant)</i>	Studland Parish Plan	
Address	24 The Green Studland Swanage Dorset	
Postcode	BH19 3BT	
E-mail	pnbowyer@btinternet.com	
Tel. Number	01929 450 391	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

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<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
--	---

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 adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature pnbowyer@btinternet.com

Date 20.12.10

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>		<input checked="" type="checkbox"/>	
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>		<input checked="" type="checkbox"/>	
It is not 'consistent with national policy'		<input type="checkbox"/>	

(For explanation of terms refer to guidance notes below)

Comments:

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

The proposed building of 200 houses in north Swanage will increase the volume of traffic through Studland village in the construction and post construction stages as well as increasing traffic on the Studland to Corfe Castle road

These concerns have been expressed in Studland Parish Plan but seem to be ignored in the development of the Core Strategy.

Representations have been made about these concerns and apparently to no avail.

Studland Parish Plan is the most detailed evidence base produced to date from the residents of the village and has been widely welcomed.

Further more there appears to be no readily available evidence base for the numbers of houses that are proposed for the district.

Calculations based on the desire to build more affordable homes for local people do not have to be in the format as presented. 100% affordable houses seems not to be considered even as an option. If PDC really wants to build more affordable houses for local people it should examine a wider range of less damaging options than supplied by the Core Strategy.

Finally, in view of the special protections afforded to the area, it is surprising why there has been no mention of the creation of a National Park for Purbeck. This would clearly address many of the concerns arising from the current failure to fully protect the area as required.
Please give due consideration to the above matters.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).



Purbeck District Council
 Local Development Framework (LDF)
 'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
 Representation Form (Nov/Dec 2010)

Your Details	Agents Details <i>(where relevant)</i>
Title	
Name	Jessica Sutcliffe
Job Title <i>(where relevant)</i>	
Organisation <i>(where relevant)</i>	
Address	Cliff Cottage, Shore Road, Swanage
Postcode	BH19 1LD
E-mail	jessicasutcliffe@iscali.co.uk
Tel. Number	01929 423108

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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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. 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 type="checkbox"/> Yes , I wish to participate at the oral examination
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Signature

Date

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : CEN	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because: <i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>	<input type="checkbox"/>		
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>	<input type="checkbox"/>		
It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

I understand that there was no public consultation on the need for ANY new houses in Swanage

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Public consultation on the need for new housing in Swanage

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : CEN	Paragraph:	Map:
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2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The Core Strategy assumes a need for 200 more houses in Swanage. Whilst not wishing to be "Nimbyist", there are some reasons for re-consideration in view of the unique special nature of Swanage:

1. **Setting:** Swanage lies surrounded by Areas of Outstanding Natural Beauty. Encroachment onto greenfield sites would be highly damaging. This particularly applies to development at Herston Fields which present a lovely and unique entry to the town and epitomises its setting.
2. **Traffic:** Purbeck is a cul-de-sac. Additional development will increase traffic on a road which is already stretched, especially in the holiday season, causing additional pressure in Wareham and Corfe Castle.
3. **Employment:** If new housing is proposed, consideration must be given to providing additional employment. This is being provided in other parts of the district where communication and access is easier and it is in those places where the bulk of housing should be provided.
4. **Affordable homes:** I applaud the councils intention to ensure that at least 50% of new homes are

affordable. These are needed and it is desirable to encourage families to live in Swanage and contribute to the schools, life and amenities of the town. However Swanage has a particular problem for we know that a large number of new houses will become second homes, contributing little to the life and economy of the area. How can this be avoided?

5. Settlement extensions: Although currently not included in the Core Strategy I understand that these are still being actively considered. I believe that the Grammar School site presents by far the least offensive option for new housing. It would certainly be the least damaging to the setting of the town. Even if the Free School idea is followed up there would still be room for some housing and roads could be improved to direct traffic away from the sea front.

6. Development Packages: I am concerned that some proposals are being prepared with additional "carrots" from other parties with vested interests. This muddies the waters. In particular I am concerned about the Health Authority's proposals to re-locate an improved health centre at Herston Fields. I do not accept that the existing site cannot be expanded and the advantages of a location in the town centre are immeasurable.

7. National Policy: We still do not know what this is and how it will effect our area but "Localism" should lead to more and improved consultation.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

1. Further consultation: Re-examine the number of houses: Re-consider options for settlement extension: Tackle the second homes issue:

2. Work on improving consultation. Much of the material sent out by the council has been informative and helpful but filling in this form is impossible! We needed a public meeting to describe the dos and don'ts and I probably still have not got it right. Many people have strong views about their environment but are put off by such obstacles. They need to be reached. This document is an exercise in how to discourage participation

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input checked="" type="checkbox"/>
---	--	--

Please state the part of that document you are commenting on:

Policy : CEN	Paragraph:	Map:
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(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

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(i.e. the Core Strategy 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 Core Strategy 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)

Development on greenfield sites will have a serious impact on the biodiversity of the area

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Limit development to infill sites or those very close to existing housing.

Swanage & Isle of Purbeck Liberal Democrats

4961
20/12/10



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

I filled in this form online but could not find a way to send it. Sorry.
Your Details

Agents Details (where relevant)

Title	MR	
Name	P.B. CLARK	
Job Title (where relevant)		
Organisation (where relevant)	Swanage and Isle of Purbeck Liberal Democrats	
Address	11, Steeple Road, Swanage.	
Postcode	BH17 1NF	
E-mail	P.B. c @ bt-internet.com	
Tel. Number	01929 452118	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	--	---

Please state the part of that document you are commenting on:

Policy : 7.5.9.	Paragraph: Housing.	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
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<i>(Tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>	<input type="checkbox"/>		
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It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

Swanage and the villages need affordable housing. It is essential that these are built. People do not realise that of the 830 new houses in Swanage, 210 are already built, and a further 160 have planning permission. Of the remaining 460, only 200 will be edge of settlement and that is where most of the affordable houses will come from. People think that Swanage will be swamped with edge of settlement development. In addition, they do not realise that these proposals will take a further 15 years to implement.

People also worry that the proposed affordable homes will be bought by tenants and then sold on the open market under the 'Right to Buy' legislation. They do not realise that there is NO Right to Buy if the tenant is going to live in an Affordable Home for the first time, [see Communities and Local Government leaflet 'Your Right to Buy your Home – a guide for tenants'],

11/11/10

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

There is no need to change the Housing Policy as written for South East Purbeck. It is just that some vocal people wish to 'water down' what is in the Core Strategy. However, plenty of others, including my organisation, support it.

Swanage Railway Co Ltd



6375
20/12/10

Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details		Agents Details (where relevant)
Title	Mr	Mr
Name	M. Whitwam	B C Eden
Job Title (where relevant)	Director	
Organisation (where relevant)	Swanage Railway Co. Ltd.	
Address	Station House Swanage	
Postcode	BH19 1HB	
E-mail	mike.whitwam@corfestation.f2s.com	bce6430@yahoo.co.uk
Tel. Number	01929 481438	07870 591187

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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--

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Signature	Signature has been blanked out	Date 14/12/2010
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy)	Sustainability Appraisal	Habitats Regulations Assessment
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Please state the part of that document you are commenting on:

Policy: CO	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant Yes No No Comment
*i.e. comments on the **process** of preparing Planning Purbeck's Future*

2. (a) Sound Yes No No Comment
*i.e. comments on the **content** of Planning Purbeck's Future*

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The reference to development being permitted in a countryside location where it is deemed essential is an all embracing statement. It leaves open to interpretation the status of uses that, whilst a countryside location is not essential, would be the only logical alternative due to other constraints. A more flexible statement would be helpful.

Countryside policy is too restrictive & does not recognise the existence of brownfield sites. The inclusion of positive policies focusing on the regeneration of such sites could contribute to an enhanced environment and rural economy, and an improved tourism & the transport infrastructure. In particular, reference is made to Furzebrook sidings, an area of brownfield land, with definable, enclosed boundaries, good access & adjoining existing employment area. The existing use of this

site in connection with the movement of traffic by rail could advantageously be brought back into use to include maintenance & storage facilities for the Swanage Railway.
The proposed policy does not address the fact that a railway company may only be able to develop essential facilities in the countryside, due to the fact that the track represents a fixed infrastructure & the greater part of adjacent land is constrained in urban areas by existing development patterns. Thus, there should be a recognition that, in exceptional circumstances, appropriate development would be permitted on greenfield sites.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Development in the countryside will be permitted where:

A countryside location is essential, or in exceptional circumstances, it can be demonstrated that no other alternative to an appropriate development is available.

It comprises of a brownfield site that can be brought back into use for appropriate activities or use without compromising other policies within the core strategy

In exceptional circumstances, It comprises of a use that can only be located in a rural area due to constraints relating to the existing infrastructure of that use

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy)	Sustainability Appraisal	Habitats Regulations Assessment
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Please state the part of that document you are commenting on:

Policy : ATS	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes	No	<u>No Comment</u>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes	<u>No</u>	No Comment
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
<ul style="list-style-type: none"> • It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i> 			
<ul style="list-style-type: none"> • It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i> 			
<ul style="list-style-type: none"> • 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)

The approved Local Plan recognised, by a clear policy, a requirement to protect sites and routes that were considered to be of importance in the future movement of traffic by rail. The Core Strategy does not include explicit policies that adequately address the protection of land used for rail purposes. Nor does it seek to protect land adjacent to existing railway stations where inappropriate development could prejudice the implementation of essential facilities, pursuant to strategic transport objectives. It fails to recognise that in order to meet these objectives, additional maintenance & storage buildings & sidings will be essential. In respect of the Swanage Railway, these sites will invariably be located within areas subject to constraining factors. A policy is required that recognises this situation, and is sufficiently flexible to permit development in such

areas in exceptional circumstances.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Development that would prejudice the existing and potential use of land for railway infrastructure and transport interchanges will not be permitted.
Development relating to the provision of railway infrastructure considered essential to the achievement of the objectives of this strategy will be permitted, subject to the all relevant planning considerations.

Swanage Town & Community Partnership

SSHS
20/10/10



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details

Agents Details (where relevant)

Title		
Name	Kim and Brendan Gallagher	
Job Title (where relevant)	Vice Chair	
Organisation (where relevant)	Swanage Town and Community Partnership	
Address	214, High Street, Swanage	
Postcode	BH19 2PQ	
E-mail	kim.gallagher2@yahoo.com	
Tel. Number	01929 427 828	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

Briefings on how to complete these forms and the process involved will be held on:

- 10th November, 7pm in the District Council offices, Wareham
- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm in the District Council offices, Wareham

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 or call 01929 557273 to speak to a member of the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

After this stage, further submissions will be only at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination.

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. 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:

<p>I believe that through my role as Vice Chair of the Swanage and Town Community Partnership and campaigning against unnecessary development in Swanage I have a good understanding of the strategic and operational issues for Swanage and how the Core Strategy impacts.</p> <p>I would also like to request that consideration be given to the timing and location of any meeting to ensure best representations.</p>

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

Signature	Signature has been blanked out
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Date 19/12/10.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : Housing Supply SE	Paragraph: 6.4.5 page 51	Map: 4
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>		<input checked="" type="checkbox"/>	
It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>		<input checked="" type="checkbox"/>	
It is not 'consistent with national policy'		<input checked="" type="checkbox"/>	

(For explanation of terms refer to guidance notes below)

Comments:

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

The target of 900 new dwellings, including settlement extensions of 200 (potentially greenfield AONB sites), for SE Purbeck, primarily Swanage, is not justified, effective or consistent with national policy for the following reasons:

1. This is 37.5% of all new dwellings in Purbeck while employment land is under 3% of the Purbeck total. Table 3 page 20. In contrast Economic growth has been identified for Winfrith (16.3 miles each way, taking 31 mins via A351 A352) and Holton Heath (13.7 miles each way, taking 28 minutes via the A351, courtesy of Google Maps). Wareham (9.6 miles, 19 minutes via A351) has also been identified as the main Hub for Purbeck. 6.6.4 states that only 1.2 hectares (included in 3% above) of employment land available in Swanage. In addition operators at a small business area in Kings Road East, Swanage have been given notice to quit (perhaps to make room for more dwellings?) This number of new dwellings with no equivalent increase in employment opportunities would not meet -Sustainable Development

S39 of the Planning & Compulsory Purchase Act 2004, the UK Strategy for Sustainable Development 2005 or Spatial Strategy: Balancing Homes, Jobs and Access to Services a fundamental sustainable development principle which runs through national planning policy including e.g. PPS1 (para. 5 and 16), PPS3 (para 10 and 38), PPS 7 (para 3), and PPG13 (para 14) or

"Planning for Sustainable Travel", a guide by the Commission for Integrated Travel

2. Congestion of the A351 effecting not only Swanage residents and tourists, but also those of Corfe, Wareham and Sandford. There is little evidence of a detailed impact assessment of this particular route bearing in mind the decision not to approve traffic management schemes for A35 and C6 or the impact of the closure of the Middle Schools and more school transport on the road. There is not an adequate Transport plan nor P.I.s in place, with measurable success criteria, to mitigate any impacts. Note Map 13 that states "Swanage is the largest town but at the end of a giant cul de sac."

3. Policy LD, p.12, states that new development should be concentrated within the settlement boundary of the Towns, where development will be permitted only in exceptional circumstances as set out in Policy CO Countryside Policy 8.2.1 which states that "the Council seeks to protect countryside from inappropriate development. However ... some are essential.... e.g. Development for the use of land for agriculture, forestry or horticulture, including dwellings for agricultural workers." No mention of second homes or health facilities. Indeed one of the P.I.s, page 93, is that 0% of planning applications for non essential development in countryside. It is also noted that a P.I. for accessibility, page 100, is that 75% of all planning approvals for residential development should be within 800m walking distance of a GP surgery, which will not be achievable if an extension settlement site is used.

4. It is unclear how specifically the Strategic Housing Market Assessment (2008), 8.3 page 56, on need applies to SE Purbeck and what is the actual level of real need, compared to the desire to live in SE Purbeck.

5. Green Infrastructure and SANGs 8.11 look to provide adequate spaces to improve health and protect the habitat. Any proposal to grant planning permission on green field AONB sites, currently used for recreational purposes will negate this policy. It is also understood that no SANGs have been identified, making the policy undeliverable.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The numbers of new dwellings should be substantially reduced in SE Purbeck with a focus on affordable homes and no extension settlements on greenfield/countryside sites. Most of the new dwellings should meet Sustainable Development guidelines by being sited closer to Economic growth areas with greater accessibility, and Wareham, identified as the service hub for Purbeck.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>		<input type="checkbox"/>	
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>		<input type="checkbox"/>	
• It is not 'consistent with national policy'		<input type="checkbox"/>	

(For explanation of terms refer to guidance notes below)

Comments:

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

The consultation process was flawed in that consultees in SE Purbeck were told that settlement extensions to accommodate 200 new dwellings were required in their area.

A) They were not given any options about having no or fewer settlement extension dwellings.

B) Four options were given, two of which were not actually available and the consultation pointed people towards the councils preferred options

C) They were not advised that a total of 900 new dwellings were being proposed nor were they given any choices about the number of dwellings

D) They were not advised that some sites had already some outline plans that included additional buildings e.g. an integrated health facility at the Herston Fields site.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Because of the change in government and policy direction PDC should reconsider their whole approach to the Core Strategy and consultation process.

Swanage Town Council



Purbeck District Council
 Local Development Framework (LDF)
 'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
 Representation Form (Nov/Dec 2010)

Your Details		Agents Details <i>(where relevant)</i>
Title	Dr	
Name	Martin Ayres	
Job Title <i>(where relevant)</i>	Town Clerk	
Organisation <i>(where relevant)</i>	Swanage Town Council	
Address	Town Hall, High Street, Swanage, Dorset	
Postcode	BH19 2NZ	
E-mail	m.ayres@swanage.gov.uk	
Tel. Number	01929 423636	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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For further information, visit http://www.dorsetforyou.com/purbeck_consultation, email or call 01929 557273 to speak to a member of the Planning Policy Team.

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<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:

Swanage Town Council is the only elected body with the ability to make representations solely on behalf of the residents of Purbeck's largest town and it is vitally important that their views are represented at the public examination. The important role of parish and town councils in speaking on behalf of local communities is widely recognised and the presence of representatives from such democratically elected bodies will help to ensure that the process of examination is seen by local residents to be open, transparent and well-informed. The recently published Localism Bill provides parish and town councils with an enhanced role, especially in shaping plans for neighbourhood development.

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

Signature Martin Ayres

Date 17th December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SE: South East Purbeck.	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>).</i>			<input checked="" type="checkbox"/>
It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The level of additional housing proposed for South East Purbeck is neither deliverable nor the most appropriate strategy because it cannot be supported by the local transport infrastructure. Map 13 on page 50 of the Core Strategy describes Swanage as the 'largest town but at the end of a giant cul de sac (A351)'. Providing an additional 900 dwellings at the end of this cul-de-sac is clearly impractical. Although policy SE lists a number of transport improvements, many of which are supported by Swanage Town Council, there is insufficient evidence to support the fact that these measures are adequate to deal with a 20 per cent increase in population in South East Purbeck. Any case for arguing that the Purbeck Transportation Strategy will effectively address the issue of congestion in Purbeck is weakened by the fact that major road schemes have been removed from that document, as acknowledged in paragraph 8.22 of the Core Strategy. During the consultation exercise carried out in autumn 2009, the Highways Agency objected to option B, which concentrated development in Swanage, because of the lack of employment opportunities and the necessity for out-commuting. The pre-submission Core Strategy projects 900 new dwellings in South East Purbeck, not dis-similar to the 1,000 contained in option B of the 2009 consultation draft. Given such concerns, the Town Council contends that there is insufficient evidence that the existing transport network

can support the proposed increase in new residents, few of whom are likely to be employed in the town. Whilst the Town Council fully supports the re-introduction of mainline train services to Swanage, it is yet to be proven whether this and other sustainable transport projects can provide transport links for commuters that will ease the congestion on Purbeck's roads.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The number of new dwellings allocated to South East Purbeck should be reduced significantly from the 900 contained in the Core Strategy. The Town Council favours a much smaller level of development in this area, closer in size to the number of new dwellings proposed in Option A of the consultation exercise held by the District Council on an earlier draft of the Core Strategy in autumn 2009. This allocated approximately 600 dwellings to Swanage and neighbouring villages, with only 251 new dwellings required for Swanage itself in addition to those that had already been completed or received planning permission. Although this level of development will still add to the congestion on Purbeck's roads in the short-term it is more likely that the proposed improvements to the transport network will mitigate its impact, at least in part. By limiting development until 2026/7, this will enable more time for improvements such as the re-connected railway link to take effect.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : HS: Housing Supply	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The Core Strategy is not deliverable because of the inconsistency of policy HS: Housing Supply with other policies and paragraphs within the document.

The allocation of 900 dwellings to South-East Purbeck will not protect and enhance the natural environment and is inconsistent with Policies CO: Countryside and LHH: Landscape, Historic Environment and Heritage.

The building of 200 new dwellings as settlement extensions is wholly inconsistent with policy CO: Countryside which limits developments outside of settlement boundaries to small-scale measures which are essential for the survival of rural communities and the local economy.

The planned settlement extensions also conflict with paragraph 8.17.1 which states that "The unique identity, beauty and appeal of Purbeck to residents, visitors and investors alike owes much to the distinctive character and quality of the landscape and historic environment". Swanage lies within the Dorset Area of Outstanding Natural Beauty and the continued expansion of the town will be detrimental to the appearance of the local landscape. This will in turn threaten the local economy which is heavily dependent on visitors attracted by its beautiful setting.

The significant number of dwellings allocated to 'character area potential' within settlement boundaries in Swanage and south-east Purbeck will also threaten the historic appearance of these settlements. Swanage

Town Council has long lamented the demolition of family-occupied dwellings and their replacement with blocks of flats, many of which are occupied for only part of the year. This concern is heightened as a result of the scrapping of policy QL 30 in the Purbeck District Local Plan (Final Edition) which protected Houses in Large Gardens in south Swanage. This policy was easily understood and widely cited by local residents when objecting to development proposals. The cumulative effect of an additional 260 dwellings within settlement boundaries, following a decade of such infilling, is highly likely to be detrimental to the character and appearance of the district, especially in those areas outside of town-centre conservation areas.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The total number of new dwellings allocated to Purbeck is too high, and the proportion of that total is too heavily weighted to Swanage and South-East Purbeck. Not only should these numbers be reduced, but the Houses in Large Gardens policy should be retained, and possibly extended to areas in the north of Swanage.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SE: South East Purbeck.	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

Policy SE: South East Purbeck is undeliverable because the number of new dwellings allocated to this area cannot be constructed without a detrimental impact on highly sensitive natural habitats, including Dorset's internationally designated heathlands and coastal sites. Policy SE refers to heathland mitigation, but there is insufficient evidence to suggest that such measures will be adequate to meet the additional pressures placed on the local environment from the significant increase in population arising from 900 additional dwellings (estimated at 20 per cent if assuming an average occupancy of 2.36 per household - see page 73 of D. Liley and D. Tyldesley (eds) Habitat Regulations Assessment of the Purbeck Core Strategy).

The Habitat Regulations Assessment highlights the need for a significant area of Suitable Alternative Natural Greenspace (SANG) to attract people away from protected habitats for recreational purposes. This is both to protect heathland and prevent grassland areas suffering from increased levels of dog-walking that will arise from the growth in households in South East Purbeck. However, although the Core Strategy states that SANGs will be required north of Swanage, paragraph 5.52 of the Habitats Assessment highlights that there is 'no specific detail' relating to such a requirement. The consultation leaflet 'Where shall we build in Swanage and Corfe Castle 2012-2026?' drew attention to an area of 'opportunities for improved public access to countryside' to the west of the town, north of the railway line extending between Washpond Lane

and Prospect Farm. The ability of this area to be seen as a SANG of sufficient size, character and quality, as highlighted in paragraph 5.50 of the Habitats Assessment, is questionable, given that large parts of this location are already in use as a caravan and camping site, flood alleviation scheme, waterworks and cemetery.

Furthermore, paragraph 5.48 of the Habitats Assessment notes that the policy of providing SANGs is as yet 'largely untested' and therefore even if suitable sites were to be identified it is entirely possible that they would not sufficiently alleviate the pressure on nearby heathland and coastal sites.

Paragraph 11.25 of the Habitats Assessment also considers the impact of additional traffic flow on the natural environment and states that it is 'not possible to conclude that the increased traffic levels both regionally and locally will not have a significant adverse effect on the integrity of the Dorset Heaths SACs'.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The number of new dwellings allocated to South East Purbeck should be reduced significantly from the 900 contained in the Core Strategy. Paragraph 7.29 of the Habitats Assessment highlights the fact that development in Swanage is likely to have the greatest impact on the natural environment in Purbeck. The Town Council favours a much smaller level of development in this area, closer in size to the number of new dwellings proposed in Option A of the consultation exercise held by the District Council on an earlier draft of the Core Strategy in autumn 2009. This allocated approximately 600 dwellings to Swanage and neighbouring villages, with only 251 new dwellings required for Swanage itself, in addition to those that had already been completed or received planning permission.

The combination of a smaller increase in population as a result of fewer new dwellings and the inclusion of smaller but more deliverable mitigation measures to ensure the protection of the highly sensitive and internationally important local environment will help to ensure that the Core Strategy itself is both deliverable and sound.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : AH: Affordable Housing	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

Swanage Town Council is fully supportive of the provision of additional affordable housing for local residents. However, it is concerned that Policy AH does not provide the most effective method of delivering increased levels of affordable housing, because it sees its delivery as dependent on large-scale development of market housing. Thus, in the leaflet 'Where shall we build in Corfe Castle and Swanage 2012-2026?' two substantial settlement extensions to Swanage were proposed of 200 dwellings and promoted on the basis that this would deliver 100 affordable dwellings.

It is a matter of concern that this policy is likely to have unintended consequences that may in fact restrict the further provision of affordable housing. For example, if private developers have to provide 50 per cent affordable housing this is likely to put up the cost of private market housing to help fund it. This will in turn place the market housing further out of the reach of local working families. The identification of specific sites for settlement extensions also drives up land prices, again reducing affordability.

Swanage Town Council contends that in parishes where local authorities have significant land holdings these should be taken into consideration and the owners encouraged to develop them for the provision of 80-100 per cent affordable housing. This would help ease the pressure for additional market housing as a means of delivering affordable housing, and prevent the increased pressure on the local transport infrastructure and

damage to sensitive habitats that the proposal for 2,400 houses in the District will bring to bear.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Policy AH should be amended to include a statement that local authorities will be encouraged to bring forward land in their ownership for development as affordable housing. Reference should be made to the recently completed Purbeck Locality Review which brought together all three tiers of local government, together with the health, fire and police services to identify their property assets and consider alternative uses. This document should form part of the evidence base for the Core Strategy. In identifying sites in Purbeck's main centres of population this sits comfortably with policy LD which seeks to focus future development in Swanage, Upton, Wareham and key service villages. Without remedying this important omission the Core Strategy cannot be seen to provide the most appropriate, efficient and effective strategy for the delivery of additional affordable housing in Purbeck.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : E: Employment and IAT: Improving Accessibility and Transport	Paragraph: §.18.1 and 8.22.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>(i.e. comments on the process of preparing Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>(i.e. comments on the content of Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The policies set out in the Core Strategy to promote a prosperous economy and improve accessibility to services omit any reference to the fundamental importance of improving the broadband internet connection in Purbeck. A 2009 report from the Commission for Rural Communities, Mind the Gap: Digital England - A Rural Perspective, sets out the very real dangers for rural communities, such as those in Purbeck, that miss out on the economic benefits that can be realised through high speed internet connections. Currently, broadband speeds in Swanage are very slow and intermittent, often preventing the completion of important business. Upload speeds in Swanage are as low as 0.34 megabytes per second, compared to a national average of 0.623 (see www.ispreview.co.uk/story/2010/12/06/uk-government-reveals-national-broadband-strategy-and-new-rural-digital-hubs.html).

The benefits of a superfast broadband connection are extremely relevant to the delivery of policies contained in the Core Strategy, and include:

- the reduction of traffic congestion as a result of enabling more people to work from home;
- improved local service delivery, possibly including online tuition for Swanage-based pupils or online health clinics;

the facilitation of rural entrepreneurship;
ensuring the survival of existing businesses which will increasingly rely on on-line payment methods as the use of cheques is phased out by 2018.
The failure of the Core Strategy to set out a clear policy to deliver such an important improvement to Purbeck's infrastructure means that its policies cannot be seen as either deliverable or establishing the most appropriate strategy for development.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Sections 8.18 and 8.22 should include paragraphs setting out the importance of the introduction of superfast broadband to the local economy, the improvement of service delivery and reduction of traffic congestion. These paragraphs should set out a preferred method for the delivery of superfast broadband in Swanage and Purbeck, commenting on the role of local authorities, businesses and local communities.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : 	Paragraph: 8.11.4	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The Core Strategy sets out a policy for Green Infrastructure, Recreation and Sports Facilities, which gives insufficient prominence to the need to identify additional allotment sites in the District. Swanage Town Council has an allotment waiting list in excess of 70 households and other towns and parishes, including Lytchett Minster and Upton, are in a similar position. This demand is likely to grow in the period covered by the Core Strategy as a result of the additional housing that is planned. The problem of demand outstripping supply has been recognised nationally and is set out in a report carried out by the National Association of Allotment and Leisure Gardeners for West Kirby Transition Town in June 2009 (www.transitiontownwestkirby.org.uk/files/ttwk_nsalg_survey_09.pdf).

This report also highlights the benefits of allotments to the wider community, not only providing an open space, but also a sustainable food supply, an educational opportunity, a healthy activity for all age groups, and fostering community development and cohesiveness. These issues have been recognised more locally by the Ageing Well in Dorset programme, bringing together representatives from local authorities, the NHS, and the third sector. Ageing Well in Dorset sees allotments as an important part of helping older people to lead a healthy and active life. In failing to recognise the importance of this issue for communities across Purbeck, the deliverability of many of the aims of the Core Strategy is weakened and it cannot be seen as

providing the most appropriate strategy for development.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Section 8.11 should contain a paragraph highlighting the importance of increasing the number of allotments for local communities across Purbeck, as described above. Giving this issue greater prominence in the Core Strategy will inform developers that this issue is a priority for both local authorities and local residents.

Note: Additional sheets can be downloaded from the website and submitted alongside this form.



Purbeck District Council
Local Development Framework (LDF)
'Planning Purbeck's Future'
Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

Your Details	Agents Details (where relevant)	
Title	Dr	
Name	Martin Ayres	
Job Title (where relevant)	Town Clerk	
Organisation (where relevant)	Swanage Town Council	
Address	Town Hall, High Street, Swanage, Dorset	
Postcode	BH19 2NZ	
E-mail	m.ayres@swanage.gov.uk	
Tel. Number	01929 423636	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

Return to Purbeck District Council by 4pm, Monday 20th December 2010

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

If you choose to type a response it would be appreciated if you could email the Microsoft Word version, making it easier to copy the responses into an examination database.

Briefings on how to complete these forms and the process involved will be held on:

- 10th November, 7pm in the District Council offices, Wareham
- 18th November, 7pm, Community Hall, The Mowlem, Swanage
- 1st December, 7pm in the District Council offices, Wareham

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 or call 01929 557273 to speak to a member of the Planning Policy Team.

As your representation will be passed to an Inspector you should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

After this stage, further submissions will be only at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination.

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. 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
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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:

Swanage Town Council is the only elected body with the ability to make representations solely on behalf of the residents of Purbeck's largest town and it is vitally important that their views are represented at the public examination. The important role of parish and town councils in speaking on behalf of local communities is widely recognised and the presence of representatives from such democratically elected bodies will help to ensure that the process of examination is seen by local residents to be open, transparent and well-informed. The recently published Localism Bill provides parish and town councils with an enhanced role, especially in shaping plans for neighbourhood development.

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

Signature Martin Ayres

Date 17th December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : HS: Housing Supply	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>	<input type="checkbox"/>		
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>).</i>	<input type="checkbox"/>		
It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

The consultation on the distribution of new housing across Purbeck was flawed, and not in line with the District Council's Statement of Community Involvement (SCI). The SCI stresses the importance of community involvement in policy and plan making and states that the public would be consulted on 'policy/strategy options rather than a single solution'.

Despite these assurances the Town Council has significant concerns over the manner in which the consultation was conducted. Firstly, the distribution of development across the District has changed between the public consultation in autumn 2009, which found that 62.7% of the respondents supported the then preferred option. That option was described in the consultation document as distributing development around Swanage, Wareham, Upton and the key service villages. Taking into account 774 new dwellings in Swanage, 17 in Corfe Castle and Langton and approximately 40 dwellings in the countryside of SE Purbeck, this preferred option allocated 34.6 per cent of new dwellings to Swanage and surrounding villages. Option B, which gained the support of only 8.9 per cent of respondents was described as focussing growth at Swanage and allocated approximately 1,000 new dwellings to SE Purbeck. In response to this consultation Swanage Town Council supported the general principal of distributing development across the district, but argued that the total number of new dwellings allocated to Purbeck should be reduced, and that the number

allocated specifically to Swanage should also be reduced to a total closer to that contained in Option A, of approximately 550-600 new dwellings.

The 2010 pre-submission draft Core Strategy has shifted the balance of development in Purbeck towards Swanage, without any further public consultation on this issue. The number of new dwellings now allocated to SE Purbeck has increased from approximately 830 to 900. As a result of this 37.5 per cent of new development in Purbeck will be in the vicinity of Swanage (up 2.9 per cent since autumn 2009). This option now more closely resembles the unpopular option B of the 2009 consultation which allocated 43 per cent of new dwellings to SE Purbeck. Officers at Purbeck District Council have argued that this is the result of increased completions/commitments in the period 2006-10. Nevertheless, in all other areas of the District increased completions/commitments have been matched by a reduced remaining requirement for new dwellings. For example, in South West Purbeck the number of completions/commitments has increased by 68 dwellings since 2009, and the remaining requirement reduced by 84. In Swanage and South East Purbeck, however, completions/commitments have increased by 113 dwellings, but the remaining requirement has remained almost unchanged at 460, a decrease of 4 on 2009.

It may be argued that an increased allocation of between 70-100 dwellings in South-East Purbeck is not significant. However, given the concerns of the Town Council and many local residents, that the number of dwellings allocated to this area in the preferred option of 2009 was too high, it is questionable whether an even higher total should have been included in the pre-submission document, without there having been further discussion with local councillors and residents. Indeed, the District Council had an opportunity to consult the public on this issue in summer 2010 in the series of 'Where shall we build in Purbeck?' leaflets. However, this consultation focused solely on the location of settlement extensions. It did not set out a range of options on the size of those settlement extensions, or even raise the possibility for individuals to object to the principal of settlement extensions. Swanage Town Council, nevertheless, argued that smaller settlement extensions should be considered. The District Council have never given the public the opportunity to discuss this option, despite their stated aim to consult on policy/strategy options rather than a single solution. Given concern over Swanage's location at the end of the A351 'cul de sac' and the impact of settlement extensions on the local landscape and environment, a yet further increase in dwellings is a matter requiring greater public involvement than has hitherto been the case. Only then could policy HS be seen as having been compiled in line with the high standards of public engagement established in the District Council's Statement of Community Involvement.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Prior to approval of the Core Strategy, the residents of South East Purbeck should be given the opportunity to comment on the allocation of dwellings in and around Swanage. A range of options should be included, at least providing the opportunity to consider smaller or no settlement extensions to Swanage as well as the District Council's most recent 'preferred option'. Greater information on the impact of increased housing numbers on locations within the settlement boundaries of SE Purbeck should also be included, which was ignored in the summer 2010 consultation process. This level of community involvement is essential given the importance attached to the role of local residents and parish and town councils in planning neighbourhood development in the Coalition Government's newly published Localism Bill.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : FR: Flood Risk	Paragraph: 8.12.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because: <i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>	<input checked="" type="checkbox"/>		
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>	<input checked="" type="checkbox"/>		
• It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

Section 8.12 and Policy FR do not set out a comprehensive strategy for addressing flooding in Purbeck because they ignore the very real issue of tidal flooding. The Core Strategy has been informed by the District Strategic Flood Risk Assessment, which refers to the potential for tidal flooding at Swanage, but the Strategy does not set out a requirement to consider investment in infrastructure to prevent flooding from a tidal surge. Indeed, tidal surge flooding of a large part of the commercial centre of the town has not been subjected to an objective risk assessment. In 2010 there were 24 tides with a tidal coefficient of 110 or higher. It only needs a depression to track up the English Channel and its associated easterly gale to coincide with one of the large spring tides for there to be extensive flooding and damage in the commercial centre. Calculations made for Swanage Pier show that a pressure of 980mb will cause the tide to rise 0.33m above prediction. The worst case scenario could result in a 1.4m rise above tidal prediction. Climate change will exacerbate the situation.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

In order to be sound, the Core Strategy should contain a paragraph in section 8.12, setting out the problems of tidal flooding in Purbeck and the steps required to mitigate the risk. The evidence base should include a rigorous risk assessment of tidal surge flooding in seaside locations.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SE: South East Purbeck and CE: Coastal Erosion	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

Policies SE and CE fail to recognise the need to protect local beaches which, as paragraph 7.5.2 acknowledges, form a key part of Purbeck's attractions to visitors and therefore the local economy. The Shoreline Management Plan (SMP) classifies the shoreline along the main beach as 'hold the line', but rising sea levels will compress the inter tidal zone so the beach will grow smaller, thereby destroying a major amenity of the town and the wider district. Paragraph 7.5.1 assumes that Swanage is, and will remain, 'a vibrant seaside town', but this cannot be taken for granted if steps are not taken to address the erosion of its main beach.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

In order to provide an effective strategy to protect the local economy, the Core Strategy should present

options to counter the problem of the erosion of the District's beaches. This issue should be set out through the inclusion of additional paragraphs in section 7.5 and section 8.14, and amendments to policies SE and CE.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SE: South East Purbeck	Paragraph: 7.5.10	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

The short section on Employment in South East Purbeck within paragraph 7.5.10 is wholly inadequate and, in focusing solely on the development of Prospect Business Park, cannot be considered to be a deliverable and effective strategy for the generation of future employment opportunities. If Swanage is to remain a thriving seaside town then steps are required to improve the quality of the town centre, including locations such as Commercial Lane, which contains a number of small retail units ideal for niche businesses. Section SS24 of the Purbeck District Local Plan (Final Edition) set out a policy for the improvement of this area, but this is to be deleted upon adoption of the Core Strategy.

No reference is made to the need to introduce superfast broadband which has the potential to both increase employment opportunities and reduce commuting by enabling greater home working.

There is also no reference to enhancing the all-important maritime economy, including facilities/infrastructure for fishing, diving and visitors arriving by sea.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Paragraph 7.5.10 should be expanded to incorporate a wider range of approved options for the growth of employment opportunities in Swanage and South East Purbeck. Reference should be made to the need to enhance parts of Swanage's town centre, introduce superfast broadband, protect the beach and encourage the growth of the maritime economy. The need to ensure that Swanage's key market segments continue to thrive, including tourism, retail, and heritage attractions should also be included. If these omissions are not rectified Policy SE cannot be considered sound.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy : SE: South East Purbeck	Paragraph: 7.5.10	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)</i>			<input type="checkbox"/>
• It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The Core Strategy fails to recognise the need for a wet weather facility in Swanage, incorporating improved sporting facilities for the town and neighbouring villages. The need for such a facility is highlighted in section C1 of the Market and Coastal Towns Initiative Swanage Strategic Plan 2007-2027 which sets out a policy 'to encourage opportunities to participate in sporting, leisure and entertainment activities for both residents and visitors'. In providing facilities for visitors to the town such an attraction is also key to the local economy.

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

The need for a new wet-weather attraction, including sporting facilities, in South East Purbeck should be recognised, either in Policy SE or paragraph 7.5.10.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

'Planning Purbeck's Future' (Core Strategy) <input type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>

(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy 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 Core Strategy 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)

Proposed Changes:

Please use the space below to give details of what change(s) you consider necessary to make the Core Strategy policies legally compliant or sound and why. It would be helpful if you are able to put forward your suggested revised wording of any policy or text (expand box as necessary).

Note: Additional sheets can be downloaded from the website and submitted alongside this form.