

# Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010  
Consultation Responses  
Part 13**

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# Tasker R



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

	<b>Your Details</b>	<b>Agents Details</b> <i>(where relevant)</i>
Title	Mr	
Name	Richard Tasker	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address	7 Church Hill Swanage	
Postcode	BH19 1HU	
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Tel. Number		

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

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

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For further information, visit [http://www.dorsetforyou.com/purbeck\\_consultation](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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**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 checked="" type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary in the space below:

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

Signature Richard Tasker

Date 20/12/2010



**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 : Introduction	Paragraph: 1.1.3 & 1.1.14	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 <b>process</b> 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 <b>content</b> 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)

I Fortunately, I am between jobs, so, as a lay person, I have just about had the time to absorb in three weeks enough from this 'tip of the iceberg' document in a sea of protocol, to form a view and try to contribute to the process as best I can.

Unfortunately, most of the good working people of Swanage will not have had the same opportunity, some without a university level of education and without access to the internet, as Swanage library is closed for refurbishment in the run-up to Christmas. Nor may they have had the time or inclination to travel to Wareham and buy a copy of the document for £12 in order to respond with the required level of evidence and expertise before the deadline.

Also, I am not a planning professional or a lawyer so I can only state my personal opinion of the legality of the process. If it is legal, then it is following the letter and not the spirit of the law.

Likewise, I can only question the statistical evidence base from my impression of how it has been put together, as I do not have the expertise, nor have I had the time to analyse the evidence base in detail.

2b This document is a valiant and comprehensive attempt to comply with the requirements of the previous government's centralised, top-down policy, which has now been revoked. It is clear that Purbeck District Council has done its utmost to implement this policy in the best interests of Purbeck District and its inhabitants, by taking maximum advantage of the greater flexibility introduced in 2008.

However, the policy's key principle of imposing centrally derived remote targets for distribution around the country in response to broadbrush national statistics appears deeply flawed. If it did have a national purpose it should have been to encourage regeneration of already industrialised areas in need of improvement in the North, rather than slavishly following demand and encouraging southward migration.

So the imposition of numbers of dwellings by central diktat reflects national demand rather than actual local need and completely undermines the aspiration of developing locally sustainable communities of appropriate design to reduce adverse impacts on the environment. So it seems Purbeck Council is attempting to achieve the impossible.

That does not mean the baby should be thrown out with the bathwater, however.

Much of what the strategy aspires to achieve is admirable. I hope the new government, in its new Localism bill, recognises this and preserves some much needed strategic control at the level of District Councils. This applies particularly to coastal towns whose seasonal nature requires special management in achieving the goal of self-sustainability all year round. Adaptations of planning strategy to cope with these special situations must be supported by strong government legislation.

To illustrate this, compare and contrast Swanage and Milton Keynes.

Swanage is a strange, secluded town by the sea, with a special sense of community. Milton Keynes has the lowest unemployment rate in the country, slap bang in the middle of England, beside the M1. Each has its charms, and each its failings, and each could do with some of what the other has. But what they both depend on, is good planning.

I spent my adolescence in Milton Keynes Village, so I saw the houses spring up in the green fields around me. It was a shock, but I got over it. The key to Milton Keynes' success is its location and the determination of local planners to attract employers as the city grew.

The situation in Swanage is very different. The planners are proposing new residential development without the employment or transport links to attract true residents rather than second home owners or holiday landlords.

My grandfather helped protect Durlston Country Park just outside Swanage from sprawling development and now it's a precious part of a world heritage site. So now it's my turn to try and help keep Swanage special.

Good planning means counteracting the failures of the market.

In Swanage, this means rebalancing an ageing and dying demographic. Local planning must focus on enabling the provision of amenities and employment for young people and growing families. Quality of development must win over quantity of development every time.

Consequently, it must be driven by the needs of the year-round local community, not the arbitrary demands of central government, nor the narrower interests of developers and landowners feeding off the almost limitless demands of outsiders uncommitted to the local community.

Small amounts of good development must be rewarded better than large amounts of bad.

With moderate, controlled, steady development, Swanage can weather the storms of the market, and build on its unique character as a social melting pot and a magnet for creative people. If it follows this path, it can grow to its optimum size, to support the necessary amenities, in harmony with its beautiful environment.

It can be a model of coastal development.

Milton Friedman and John Maynard Keynes, can we have a coalition ... please?

**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).

Join together with other coastal towns in a similar predicament to make the strongest possible representations to central government that the new Localism Bill should include measures to help reduce second home ownership and the building of excessive numbers investment properties for seasonal use only.



**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 : 1.2.3	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 <b>process</b> 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 <b>content</b> 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)

With the new Localism Bill in the offing, the PDC is not powerless to influence upcoming planning legislation

**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).

Join with other affected councils to press for change



**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 : 6.1.1 & (8.3.3)	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 <b>process</b> 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 <b>content</b> of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>

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**Comments:**

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

2b The waiting list is not an accurate guide to local housing needs as people are entitled to put their name down from outside the area.

The policy of requiring 50% affordable housing will not change the proportion or demographic of local residents and will encourage a wide discrepancy in housing quality between market houses and 'affordable' houses.

8.3.3 2b This BHM housing model appears to have been based on the overall housing market in Poole and Bournemouth and does not necessarily apply to the housing situation specific to Swanage. So it cannot reasonably inform housing mix policy in Swanage, which is a very different kind of 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).

Reduce the cost of 'affordable' housing to make it truly affordable for local people by using prefabricated eco-houses. These could also be used for 'intermediate' housing to attract knowledge-based workers interested in reducing their carbon footprint and contributing to the local year-round local economy. If the houses are equally attractive to middle income earners, they will not necessarily need to be pepperpotted with conventional houses so that they stand out as of lower quality

**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 : 6.1.3	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 <b>process</b> of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
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*(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)

2b This policy does not consider the possibility that a lower level of growth might be preferable.

**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 PDC should consider whether upcoming legislation in the Localism Bill will give them alternative powers to control the location and extent of developments in Swanage as an integrated and sustainable community - without having to do a deal on the proportion of affordable homes which is not in the best interests of the town as a whole.



**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 : 6.6.4	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 <b>process</b> 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 <b>content</b> 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)*

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*(For explanation of terms refer to guidance notes below)*

**Comments:**

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

This will not generate enough employment in proportion to the number of dwellings proposed. The constriction of the A351 at Corfe Castle restricts the amount of goods based industry that can grow here. The highly successful local firm Chococo has had to move to Wareham, presumably, amongst other things, in order to have access to better transport arteries.

**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).

Only permit housing development in proportion to realistic expectations of employment for non-knowledge based workers.

**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 : 6.7.3.2 & (7.3.7)	Paragraph: (final)	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 <b>process</b> of preparing 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 <u>evidence</u> 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)

6.7.3.2 This is an excellent piece of planning intervention preventing the cancerous growth of high-street killing out-of-town stores.

7.3.7 This is an excellent move in the right direction. Combined Heat and Power saves huge amounts of wastage transmitting electricity down long cables.

(I have many more comments to make on other policies in the document, some in favour and some against, but I have run out of time and comment sheets.)

My main concerns are provision of appropriate employment to justify housing mix, quality and quantity within the constraints of the pinch point on the A 351 at Corfe Castle.

**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).

None
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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	R Taylor	
Job Title (where relevant)		
Organisation (where relevant)		
Address	7 Kennington Square	
Postcode	BH20 4JR	
E-mail	robert.taylor47@virgin.net	
Tel. Number		

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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:

The consultation process appeared to be slanted towards the preferred council position as regards housing and retail 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 RT

Date 14/11/10

**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 : Spatial Objective 8	Paragraph: 6.7	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 <b>process</b> 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 <b>content</b> 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 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)

(a) The RIA on which the statement in 6.7.3.1 is based was conducted by a company which promotes itself on its website with a picture of a major supermarket. This lends credence to the bias in some of the questions e.g- where do you do your major food shopping? with no secondary question such as why? (because I work there, or I do it when I also do my financial/clothes shopping) used in its surveys of public opinions as a pro-supermarket company.

**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).

As there is no quantitative requirement, only a possible qualitative need - then all reference to qualitative should be deleted. i.e all after 'However in 6.7.3.1.



**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 : Spatial Distribution of Development	Paragraph: 7.3.7 and 7.3.8	Map: 9
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

In the consultation process the results of which parts of the Core Strategy are based, a document 'Where shall we build in Wareham 2012-2016' contained a statement that Wareham Town Council supported option A. At the time of publication this was untrue, because at a subsequent open town council meeting the town council stated they had not made a decision, and when they did at this meeting it was with amendments.

**Proposed Changes:**

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Any decisions regarding building within Wareham and retail shopping contained within the Core Strategy is suspect - as the public was given incorrect information when asked for its opinions.

# Theatres Trust

**From:** Rose Freeman[SMTP:ROSE.FREEMAN@THEATRETRUST.ORG.UK]  
**Sent:** Wednesday, December 15, 2010 8:14:03 PM  
**To:** email-LDF  
**Subject:** Core Strategy Schedule of Amendments  
**Auto forwarded by a Rule**

Our Ref.: RF/3283

## **Core Strategy Schedule of Amendments**

Thank you for your email of 8 November consulting The Theatres Trust on the Schedule of Amendments for the Core Strategy.

The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that '*The Theatres Trust exists to promote the better protection of theatres.* It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include '*development involving any land on which there is a theatre.*'

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate matters relating to cultural facilities.

We have noted the amendments which mainly relate to housing matters and the list of deleted Local Plan policies but we have no comment to make and look forward to being consulted on further LDF documents especially any town centre Area Action Plans.

Rose Freeman  
Planning Policy Officer  
The Theatres Trust  
22 Charing Cross Road  
London WC2H 0QL  
Tel: 020 7836 8591  
Fax: 020 7836 3302

[planning@theatrestrust.org.uk](mailto:planning@theatrestrust.org.uk)

\*\*\*\*\*  
Learn more about theatres with our online resource '[Exploring Theatres](#)'  
Check out your local theatre on The Theatres Trust '[Theatres database](#)'  
\*\*\*\*\*



**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	Ms	
Name	Rose Freeman	
Job Title <i>(where relevant)</i>	Planning Policy Officer	
Organisation <i>(where relevant)</i>	The Theatres Trust	
Address	22 Charing Cross Road, London	
Postcode	WC2H 0QL	
E-mail	planning@theatresrust.org.uk	
Tel. Number	020 7836 8591	

Responses should be sent to:

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

- 10<sup>th</sup> November, 7pm in the District Council offices, Wareham
- 18<sup>th</sup> November, 7pm, Community Hall, The Mowlem, Swanage
- 1<sup>st</sup> 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](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 checked="" type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , 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 Rose Freeman on behalf of The Theatres Trust
--

Date 15 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"/>
--	--	---

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

Policy : CF Community Facilities and Services	Paragraph: 8.10	Map:
--	--------------------	------

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

1 Legally compliant <i>i.e. comments on the <b>process</b> 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 <b>content</b> 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 <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)

Although we find the document to be Sound, we suggest that the description of community facilities at 8.10 relating to Policy CF is amended. The list of facilities relating to Policy CF is very explicit as particular venues, buildings and services are named except for the term 'cultural facilities' which is not included in the Glossary and requires explanation in our opinion..

**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).

Cultural facilities include museums, libraries, cinemas, performance arts, art galleries, concert halls and public art and these itemised venues should be added to the list at para.8.10 rather than using the term 'cultural facilities'.

# Think Global Group



2636

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

2636
Purbeck District Council Purbeck Planning & Policy Community Planning & Policy
2010 2010 2010
ACKNOWLEDGEMENT
ACKNOWLEDGEMENT
FILE REF: ABCDE

Your Details		Agents Details (where relevant)
Title	MRS A	
Name	RACHEL PALMER	
Job Title (where relevant)	CHAIRPERSON	
Organisation (where relevant)	THINK GLOBAL GROUP	BAL
Address	CLOUDS, 141 COMONS ROAD BOUINGTON	
Postcode	WAREHAM BH206NR	
E-mail		
Tel. Number	01929 462423	

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> December 2010**

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

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

An example of a completed form is available on the Council's website.

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For further information, visit [http://www.dorsetforyou.com/purbeck\\_consultation](http://www.dorsetforyou.com/purbeck_consultation), email or call 01929 557273 to speak to a member of the Planning Policy Team.



You should cover succinctly all the information supporting information and support/justify the representation and the suggested

After this stage, further submissions will be only at the request of the Inspector appointed by the Secretary of State, based on the matters and issues 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:

INACCURACIES COULD LEAD TO  
A TOTALLY MISCONSTRUCTED VIEW  
OF THE WOOL BOWINGTON AREA  
LONG TERM ISSUES IGNORED

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 - 17th Dec 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: (SW) MS	Paragraph: 7.23 7.27	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 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:			
<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)

4.21 Good that the more rural areas will retain their functional character.

4.31 Conserve and enhance Purbeck's natural habitat.

**Policy MS.** This could be in conflict with further technical work considering being undertaken for strategic housing growth long term in view of the location of the original Area Action Plan. This was removed and all consultation dropped. It would be vastly damaging to the rural nature, ancient woodlands, river flood plain and rich habitat mosaics of this area. If this is to be resurrected then clear map location should be included in this Core Strategy for comment. **OR REMOVE MENTION**

This bears out a criticism of inconsistency and conflicting and, in some cases, erroneous views about Bovington.

7.27 The facilities at Bovington do not include a Doctors' Surgery for the civilian population. There will be only one school, not schools, as the Bovington Middle School is to close.

The high proportion of children occurs in west Bovington. East Bovington – the Cologne Road complex – has a higher proportion of elderly and over 60s for which, if development of 21 Cologne Road in line with local wishes is focussed here, will be sustainable for small resources needed by the elderly. The high level of waged population is due to MOD but will be increasingly affected by increasing affordable housing in the area reducing its sustainability not improving its role as a key service village.

Monkey World is not in the Bovington settlement and does little for its sustainability.

These statements, with the hint of an Area Action Plan, plus the statement 7.27 that there are ambitions for improved linkage with employment within the village, the word is used rarely but help encompass the Dorset Green Technology Centre – to date attracting few businesses and providing little employment in the area. All these seem to reflect a wish list and "ambitions" contrary to those expressed by local people. Is this preparing the ground for Purbeck to increase more affordable housing in Bovington as a stop gap position, an easy solution to housing allocations? It must be noted that the District Council has a vested interest in more affordable housing.

#### 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 DETAILS EVIDENCE  
AND AREA MAP OF  
"AREA ACTION PLAN"  
OR REMOVE, MENTIONS  
AND HINTS.

Note: Additional sheets can be photocopied and attached to this form



**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: S.W./L.D.	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 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)

3.1 The original RSS Draft 2006-2026 recommended 5,400 houses for the region, so why has Purbeck in the Core Strategy recommended 5,917 as they see as a main challenge protecting and enhancing the natural environment?

**CONFLICTING AND INCONSISTENT STATEMENTS**

5.62 Mentions settlement extensions at Bovington.

7.28 Mentions a new supply of military housing -- 30 for MOD needs.

7.27 Mentions this development will include more affordable housing. (At present Bovington has an unbalanced proportion of affordable housing).

REMOVE S.62      SEE PREVIOUS  
EVIDENCE  
AGAINST SETTLEMENT  
EXTENSION AT BOVINGTON

**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).

REMOVE S.62 - SEE PREVIOUS  
EVIDENCE PAGE 6.  
CLARIFY      INDICATE THE  
SITUATION AS REGARDS  
IMPLICATIONS FOR FURTHER  
GROWTH INCLUDING MORE  
AFFORDABLE HOUSING - VERY  
HIGH LEVELS ALREADY - AT  
BOVINGTON.

Note: Additional sheets can be photocopied and attached to this form

**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 : ✓ 1 A T	Paragraph: 8.22.3	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 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)*

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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)

8.22.3 Strongly oppose use of C6 as a corridor to bring through traffic south of the A35 because:

- (1) Environmentally damaging to adjoining SPA heathland – many accidents have occurred on this narrow road including one involving a fire with damage to nearby vegetation.
- (2) Tanks use this road.
- (3) Widening because of environmental and geographical constriction – narrow bridge – and drainage is fraught with problems.
- (4) It will result in bottle-necking in Wool.



[Empty rectangular box for proposed changes]

**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).

REMOVE 8.22.3  
USE OF C6 AS A  
CORRIDOR.

Note: Additional sheets can be photocopied and attached to this form

**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 :	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 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>(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)

7.23 The Wool Parish Action Plan, which includes Bovington, states clearly the desire to remain as a village – improved community facilities not high on the list, with support ranging from 14-30%, whereas 61% were concerned about speed in the Parish, 92% expressed interest in preserving rural landscapes around the Parish, 77% in favour of rural circular walks. All this adds up to a population not embracing development and more infrastructure with open arms – appreciating what they have.

[Empty box for proposed changes]

**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).

A NEW STATEMENT  
REFLECTING THE REAL  
VIEWS OF LOCAL PEOPLE  
TO REPLACE THE ERRONEOUS  
VIEW THAT FACILITIES  
ARE TOP OF THE WISH LIST.

Note: Additional sheets can be photocopied and attached to this form



**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: CO TA	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 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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<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 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)

COASTAL AREAS HAVE REACHED THEIR CARRY CAPACITY WITHOUT DAMAGING NATIONAL HERITAGE SITES FURTHER ENCOURAGEMENT FOR GREATER TOURIST INFLEX FOR BEACH HOLIDAYS SHOULD BE RESISTED

# Trees for Dorset

2635



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

Purbeck District Council Community Planning & Policy
7 DEC 2010
ACKNOWLEDGEMENT A B C D E
PLEASE RETURN TO:

Your Details	Agents Details (where relevant)
Title	MAS MR.
Name	RACHEL PALMER DAVID KING
Job Title (where relevant)	CHAIRMAN TREASURER
Organisation (where relevant)	T TREES FOR DORSET ST
Address	Cross 1st CONCHARD RD HIDE BUSHINGTON WAREHAM
Postcode	WAREHAM BH20 6NR BH20 7NT
E-mail	David.King@gbpitd.com.uk
Tel. Number	01929 462623
	M.B. DWE TO HEALTH PROBLEM OUR TREASURER MAY STAND IN.

Responses should be sent to:

Email: [ldf@purbeck-dc.gov.uk](mailto: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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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](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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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:

NO CONSIDERATION SEEMINGLY GIVEN TO THE ROLE OF TREES A CLIMATE CHANGE <del>INT</del> THE CONSEQUENCES IS MINIMAL
---

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 2 19th Dec 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 : G1	Paragraph: 8 – 11	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 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:			
<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 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)

POLICY G1, Paragraph 8-11

Green Infrastructures makes no mention of trees which will provide an increasingly important role in the present environment of climate change.

**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).

- ADD**
- (1) Aim for the retention of all mature trees on a development site with only those deemed dangerous on arboricultural inspection exempt.
  - (2) The planting of new trees on development sites with back-up care. Suggest – 2 per 10 new houses.

The above to retain and add visual amenity as well as maintain biodiversity and buffer against hard standing run-off events with increasing storm levels. Provide shade.

**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"/>
---	--	---

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

Policy :  	Paragraph:  	Map: <input checked="" type="checkbox"/>
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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:			
<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)

MAP 15

Actual areas of woodland within and around Bovington and Wool north of the Frome exceed in total acreage those shown to the south of Wool – so what is the relevance of woodland being cross-hatched in this area where, apart from small isolated mainly SSCI woods, very little exists. Wool Parish has fourteen ancient woodlands and further development of this area with, say, an Area Action Plan necessitating added infrastructure, would be environmentally damaging and increase fragmentation. Is the cross-hatched area a bid for mitigation should further extension of Wool and Bovington appear? This is inappropriate to the quality of woodland: it is not another Wareham Forest – an access could prove difficult.



**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 :	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 <b>process</b> 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 <b>content</b> 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"/>		
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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)

PROPOSED CHANGE

ENCOURAGE WIDER INTEREST  
ALL THE YEAR ROUND TOURISM  
COMPATIBLE WITH RICH &  
VARIED LANDSCAPE RESOURCES

TOURISM

Ecofriendly tourism would be compatible with varied landscape and historical and organic farmland in area.

W.S. TRITE-1  
 6377  
 0112/10



**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	COUNCILLOR	
Name	WILLIAM S. TRITE	
Job Title (where relevant)	DORSET COUNTY, PURBECK DISTRICT &	
Organisation (where relevant)	SWANAGE TOWN COUNCILLOR	
Address	134 KINGS ROAD WEST, SWANAGE,	
Postcode	DORSET BH19 1HT	
E-mail	swanbase.w@virgin.net	
Tel. Number	01929 481461	

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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.

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

- 10<sup>th</sup> November, 7pm in the District Council offices, Wareham
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For further information, visit [http://www.dorsetforyou.com/purbeck\\_consultation](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.

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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 AM CURRENTLY THE MAYOR OF SWANAGE, WITH SOME EXPECTATION TO SPEAK ON BEHALF OF ITS RESIDENTS.  
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 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"/>
--	--	---

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

Policy: <i>HS: HOUSING SUPPLY</i>	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:

*(tick all that apply)*

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)

*SEE ATTACHED PAPER (A)*

**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 CORE STRATEGY SHOULD UNDER NO CIRCUMSTANCES BE AGREED UNTIL THE PEOPLE OF SWANAGE HAVE HAD THE OPTION OF COMMENTING ON THE EXTENT, IF ANY, OF NEW HOUSING AND THEN - IF IT IS FAVOURED - WHERE IT SHOULD BE LOCATED.*

(A)

1. The process of preparing the Core Strategy was slipshod and not thorough. Many local residents report that they did not receive consultation documentation and I have been genuinely surprised at how many are only now becoming aware of the high volume of new housing which it is proposed to build in Swanage.

2. The consultation has not provided a proper range of options from which local people could choose. The headline question was a leading one - "Where shall we build in Swanage..?" rather than the open and fair question "Should we build in Swanage and, if so, where?". This has had the effect of making people assume that Swanage will have large numbers of houses foisted upon it one way or another, so that those in area X of the town have, to a large extent, opted for such housing to go in area Y and *vice versa*. Therefore statements to the effect that a high percentage of residents favour this location or that location are misleading, ill-founded and frankly hogus, which is the experience of anyone familiar on a day-to-day basis with general views in the town. So there has been insufficient scope for the expression of real opinion. The Core Strategy's 'evidence' base is seriously flawed. The consultation does not, and cannot, evince genuine opinion because options have been artificially restricted.

3. The Pre-Submission Draft places higher development levels on Swanage without any further recourse to consultation with the people of the town. This, together with 1 & 2 above, is inconsistent with Purbeck District Council's own "Statement of Community Involvement".

4. The original Regional Spatial Strategy figures (2,100 dwellings, later increased to 2,400 plus the late unlamented 'Western Extension') were determined on a highly unscientific basis with no reference to the actual needs of local people. Whereas there is almost universal agreement that a degree of affordable housing for Purbeck people is needed and fully justified, the District Council confuses 'need' with 'demand' and therefore grossly overstates the number of affordable dwellings required. This in turn leads to far more 'market' houses being proposed than either the unique character of this area can survive or its infrastructure can bear. Many people are afraid to point to these basic truths for fear of being castigated as 'NIMBYS' or worse, which begs the question: "What if you live next to an area of aesthetic or amenity value which is worth preserving for future generations, yet which it is proposed to despoil by further building?" My answer can only be that you have the right (and perhaps the duty) to seek to conserve it, whatever the condemnation you bring upon yourself or whatever the name-calling, even if you yourself benefit by living close by.

5. Swanage Town Council, which speaks for the people of Swanage quite uniquely, has declared that it would support smaller necessary developments in a variety of locations as may be appropriate after consultation with residents. However, residents have had no opportunity to make their views known in this respect. The Council does not support massive development in one or two places such as Herston Fields or the former Grammar



School site. The first-mentioned location is a very important amenity for hundreds of nearby residents and the latter is a 'green lung' extending in towards the centre of the town. It is also highly desirable for the future economic and social resilience of Swanage, and for its demographic diversity across all ages, that every opportunity should be explored to see the former Grammar School building returned to educational use as a Secondary School for the locality. The viability of such a school would not depend upon the construction of so many new dwellings in the town.

I fully concur with the position of the Town Council.

6. Whereas I am reluctant to appear to be in any way dividing the area of Purbeck against itself, it is nevertheless clear that Swanage has borne far more than its 'fair' share of past development in Purbeck. I well recall, many years ago, Swanage residents being assured by the District Council that if in-filling within the town were accepted, there would be no need to encroach on its environs. Over the last 20 years an enormous amount of in-filling has taken place, to the extent that the character of Swanage has been adversely - if not terminably - affected. Yet now the demand is to concrete outwards after all, despite such assurances. This cannot be justified on any grounds.

7. Some few years ago an Inspector remarked that no further significant development should take place along the A351 until the traffic and congestion effects of doing so had been mitigated. No effective mitigation whatsoever has taken place, whilst the alarming level of proposed new houses in Swanage will exacerbate problems with the A351 along its entire route between Swanage and Sandford. Prior to a couple of years ago I lost count of the number of times I heard District Council officers bewailing the inadequacies of the A351 to deal with the growing traffic being generated by Swanage at that time. Now, when the road has not changed whilst far more houses, people and consequent vehicles are in the offing, there comes not a murmur of concern. This is not in the local public interest.

8. The Core Strategy is entirely at odds with the principles and the spirit of the new national policy, although the latter has yet to appear in its final form via legislation. The Core Strategy as proposed is based upon 'top-down' governance with externally imposed housing figures, whereas the Coalition Government has made it clear that it seeks 'bottom-up' proposals in such important matters. For this reason alone, local residents had the right to expect the Core Strategy figures to be re-worked by the District Council so that the latter could bring forward its own, self-generated numbers based upon a much better understanding of Purbeck, its people, its needs and its aspirations. This would not have required the scrapping of five or six years of work (as has been wrongfully claimed), only the revision of relatively recent data and the undertaking of an open-ended rather than a closed consultation.

# Trustees of Sir T E Lees Estate Settlement



**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	The Trustees of Sir TE Lees' Estate Settlement
Job Title <i>(where relevant)</i>	Landowners
Organisation <i>(where relevant)</i>	Chichesters Land Agents
Address	c/o Chichesters Land Agents, 33 West Borough, Wimborne, Dorset.
Postcode	BH21 1LT
E-mail	info@chichesters.co.uk
Tel. Number	01202 882336

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> December 2010**

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- 1<sup>st</sup> December, 7pm in the 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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<input checked="" type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , 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.

<b>Signature</b> Oliver Chamberlain for and on behalf of the Landowners
---

<b>Date</b> 19th 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 : NE	Paragraph: 7.4.7	Map: 11
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <b>process</b> 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 <b>content</b> 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 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)

While we welcome the allocation of some growth to Lytchett Minster in Policy NE, para 7.4.7. We consider the Core Strategy is inflexible to meet the future housing needs of the District by excluding consideration of development in the Western Sector. It is our believe that that the Core Strategy makes insufficient provision for housing, both open market and affordable, to meet both the current and future aspirations of the local community. The Western Sector, in particular the Lytchett Minster area, affords one of the few opportunities in the District to provide a deliverable, sustainable mixed residential/employment development that will meet the future demand.

**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 propose the Core Strategy is amended to make greater provision for future development in the Lytchett Minster area (the Western Sector).



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

<b>Your Details</b>	<b>Agents Details (where relevant)</b>
Title	Mr
Name	Mrs S Omond, Mrs E Berton & Mr CJ Lees
Job Title <i>(where relevant)</i>	Land Agent
Organisation <i>(where relevant)</i>	Chichesters Land Agents
Address	c/o Chichesters Land Agents, 33 West Borough, Wimborne, Dorset.
Postcode	BH21 1LT
E-mail	info@chichesters.co.uk
Tel. Number	01202 882336

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> December 2010**

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<input checked="" type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , 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 Oliver Chamberlain for and on behalf of the Landowners

Date 19th 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"/>
--	--	---

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

Policy : NE	Paragraph: 7.4.7	Map: 11
----------------	---------------------	------------

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

1. Legally compliant <i>i.e. comments on the <b>process</b> 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 <b>content</b> 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 <u>evidence</u> 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)

We support the allocation of a settlement extension of some 70 dwellings at Policemear's Lane in Policy NE as shown on Map 11.

1. The site is well positioned and forms a natural extension to Upton.
2. The site is immediately available for development.
3. The site will help to contribute to the needs and aspirations of the community for the provision of open market family housing and affordable housing to enable local people to remain in Upton.
4. It should be noted the proposed well established local developer is very familiar with the area.
5. Both the Landowners and the Developer are able to deliver the completed 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).

n/a

# Trustees of WH Drax 1962



**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		Lee Scott
Job Title <i>(where relevant)</i>		Associate Planner
Organisation <i>(where relevant)</i>	Trustees of WH Drax 1962 Discretionary Settlement	Smiths Gore
Address	c/o Smiths Gore	Exchange House, Petworth
Postcode		GU28 0BF
E-mail		lee.scott@smithsgore.co.uk
Tel. Number		01798 345971

Responses should be sent to:

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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:

In order to ensure that the landowner's views are properly represented
--

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 17 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"/>
--	--	---

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

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 <b>process</b> 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 <b>content</b> 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 <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)

Although this policy is supported as sound insofar as it seeks to identify Bere Regis as a Key Service Village, it is considered that the unique relationship that Bere Regis has in the north-west of the District - compared for example with similarly sized settlements that may have a more co-dependant relationship with other towns - means that Bere Regis should be identified as a settlement of particular importance in terms of the facilities it provides.

**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 is suggested that the following explanatory sentence be added to Policy LD:

Due to its more remote location vis a vis other larger settlements, it is important to ensure that

Bere Regis is able to maintain and enhance its range of services and facilities - which in large part serve residents that would otherwise need to travel large distances. As such, proposals which help to ensure the long term vitality of the community will be supported.

**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: <b>6.2</b>	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 <b>process</b> 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 <b>content</b> 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 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)

Whilst it is entirely laudable that the District Council should wish to limit the land-take of meeting its housing requirements, and at the same time promote compact, walkable settlements, it is suggested that the plan as currently framed represents an over-reliance upon windfall sites.

Paragraph 59 of PPS3 states that 'allowances for windfalls should not be included in the first 10 years of land supply unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified.' No such robust evidence has been provided in this case.

Paragraph 59 goes to state that 'in these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends'

Turning to the specific approach to housing supply in the north-west of the District set out in Policy HS, it is expected that 35 dwellings can be contained within the existing built up area of



settlements, including Bere Regis, out of a total allocation of 115 dwellings. This represents about 35% of the total allocation across the plan period.

Whilst there is evidence to support such a high level of windfall sites looking backward - when for example the Griffins Yard development at Bere Regis was completed on the former builders yard - it is difficult to see how this approach can be realised moving forward. It is also considered pertinent that the Coalition Government have moved to abandon targets that promote increases to the density of development and tackle the somewhat artificial inflation of brownfield targets by the removal of private gardens from the definition of previously developed land.

**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).

Unless it can be adequately demonstrated that deliverable, achievable sites are available within the plan period, it is suggested that the windfall allowance be removed, pending an suitable evidence base.

**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 :  ELS	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 <b>process</b> 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 <b>content</b> 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)

The commitment to the allocation of around 1ha of employment land at Bere Regis is strongly welcomed and supported. This allocation will help to foster greater self sufficiency at Bere Regis and ensure the maintenance of a viable community.

**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 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 :  NW	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 <b>process</b> 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 <b>content</b> 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)

The commitment to allocate land in Bere Regis for around 50 dwellings and 1ha of employment land and as part of the Site Allocations Plan is strongly supported.

In addition the commitment to permit around 50 dwellings as part of proposals that bring forward a new primary school at Bere Regis are also welcomed. With regard to that, it is suggested that the current wording of the policy tends to assume that the school and housing would be co-located, which may tend to restrict the delivery of both.

**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 is suggested that the wording of the fifth paragraph of policy NW be altered to read:



"...proposals that also provide the 50 dwelling allocation on one or more sites as part of an overall strategy for the Village will be considered favourably..."

In addition, the wording of the fourth sentence of para 7.1.8. should be amended to read:  
"Both the landowners with interests at Bere Regis have declared their interest in providing land for a new school as part of an overall strategy for the Village that includes for an allocation, or allocations totalling 50 dwellings".

# Wadsworth J



Purbeck District Council & Local Council  
Community Planning & Policy

22 DEC 2010

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

5743

Your Details		Agents Details (where relevant)
Title	MRS	/
Name	JEAN WADSWORTH	
Job Title (where relevant)	TEACHER	
Organisation (where relevant)		
Address	5 Drummond Road, Swanage	
Postcode	BH19 2DX	
E-mail	jeanwadsworth@talk.talk.net	
Tel. Number	01929 422050	

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

- 10<sup>th</sup> November, 7pm, District Council offices, Wareham
- 18<sup>th</sup> November, 7pm, Community Hall, The Mowlem, Swanage
- 1<sup>st</sup> December, 7pm, 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](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"/>
--	--	---

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 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)

Purbeck Core Strategy Pre-Submission map on Page 50 : (ref-Map 13 Context in S. E. Purbeck): dated November 2010.  
This map tells all.  
The logic in choosing Swanage as the town for the building of 900 new homes has to be questioned because of its location and geographical context in an A.O. N.B.  
I have lived here for over 30 years. It has



experienced change, but retained its attraction to tourists. There would never be enough work to support affordable housing; the road, health, education infrastructure is adequate, but an increase of thousands in its population could never be catered for, without vast investment in services. Who would pay for this? Swanage is at the 'end of the line'. The railway link to Wareham was promised decades ago. It is unrealistic to state in the strategy document that a rail link is likely. Swanage depends on ferry links plus one road (A351) to Wareham. There are no real alternatives. To increase traffic flow by over-development of Swanage would be suicidal for current residents.

**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 my response to the Council's plan for location of development, I was asked to indicate which areas could possibly sustain development. The number of 900 new homes in Swanage was not suggested. I believe that the document is an academic treatise which threatens the beauty of the Isle of Purbeck, Swanage and surrounding areas. I strongly advise that you reduce any new development to a limit of 200 new dwellings, as before, and suggest that <sup>these</sup> 200 dwellings be distributed throughout the Isle of Purbeck, not solely in Swanage.

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

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

Signature	Signature has been blanked out
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Date	12.12.10.
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**Purbeck District Council**  
Local Development Framework (LDF)  
**'Planning Purbeck's Future'**  
**Core Strategy Pre-Submission Document**  
Representation Form (Nov/Dec 2010)

**Your Details**  
*(where relevant)*

**Agents Details** *(where relevant)*

Title	Mr	
Name	John Gladney WADSWORTH	
Job Title <i>(where relevant)</i>	Pharmacist	
Organisation <i>(where relevant)</i>		
Address	Brownroof 5 Drummond Road Swanage	
Postcode	BH19 2DX	
E-mail	gladney@talktalk.net	
Tel. Number	01929 422050	

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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



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	
--	--

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	J G Wadsworth
-----------	---------------

Date	13.12.10
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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)		
--	--	--

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

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

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

1. The Summer 2010 Consultation Survey asked residents of Swanage for their views on locations for provision of <b>400</b> new dwellings with <b>200</b> to be 'affordable' I am sure that I was not alone in inferring that this was the <b>total</b> proposed increase in homes.
2. Now, I discover that there are <b>900</b> extra homes proposed of which <b>450</b> would be 'affordable'. I

believe that we have been misled over the number, and therefore, impact of the proposals.

3. This latest proposal would **fail** to comply with the **Key Issues** in the Core Strategy objectives (2.2.1) especially in relation to 'harm to built, natural and cultural environment' and 'traffic issues', since an increase of **20%** in number of homes (and therefore, people) in Swanage would irreversibly change its character and adversely impact on the quality of life of both residents and visitors. There would be extra strain on our already congested roads both in and outside the town, causing delays and frustration to locals, visitors and the emergency services! (To suggest that the railway could have any significant contribution is wishful thinking as it will never be anything other than a desirable and enjoyable leisure experience.

4. It should be part of the LA Policy to encourage people to live near to where they work! To suggest that Swanage should be a dormitory town for Poole and Bournemouth is not logical in sustainable terms. Not only would there be an increase in traffic congestion but a huge increase in carbon emissions. Does the Council wish to be responsible and accountable for that?

5. Having lived in Swanage for over 30 years I have observed the LA's encouragement of the loss of hotels, guest houses and larger homes to create blocks of flats. This has brought about a change in the built environment in many parts of the town. Where would an additional 900 homes be built? There is simply little available space for 'in-fill' (which itself erodes the green spaces so important in our community). That some of these are 2nd Homes/Holiday homes is a good thing as the owners pay virtually the same in Council Tax as others but do not fully use the facilities which are paid for.

6. We are already facing the prospect of a wind farm just off shore!! We do not need anything else to detract from our important tourist and retirement industries.

#### **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. There appears to be a confusion about 'affordable housing **needs**'. Swanage is a very desirable place in which to live. There should be adequate provision for those who **work** in Swanage to be able to live here. We should **not** be providing housing for people who work in Poole, Bournemouth or Dorchester! I am convinced that a proper analysis would show that our **real** affordable housing needs are lower than stated!

2. **No new** homes should be built unless **local jobs** are created for the residents at the same time!

3. There are currently well in excess of 200 homes on the market in Swanage. Many have been unsold for a period of time. There is also a significant amount of 'unfinished' housing. Could not these be purchased by the Housing Association and offered as affordable housing to persons



working in Swanage?

4. **No new** homes should be built until the current Purbeck **roads** network is improved. This may be a constraint imposed by another authority, but is a reason why additional homes should not be built until a remedy is agreed.
5. Swanage is an AONB. So is most of Purbeck. But Swanage is part of a **World Heritage Site** and this must be taken into account when making decisions which will have an irreversible impact on the quality of our environment, not just for our generation, but for many generations to come.
6. **You** have important decisions to make. Thank you for the opportunity to contribute to this process. Please make the right judgements!

**End of Submission**

# Wareham St Martin Parish 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	Miss	
Name	MD Weller	
Job Title <i>(where relevant)</i>	Clerk	
Organisation <i>(where relevant)</i>	Arne Parish Council	
Address	5 Border Drive Upton Poole	
Postcode	BH16 5DU	
E-mail	debbie_weller@warehamstmartinpc.org.uk	
Tel. Number	01202 624261	

Responses should be sent to:

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

- 10<sup>th</sup> November, 7pm in the District Council offices, Wareham
- 18<sup>th</sup> November, 7pm, Community Hall, The Mowlem, Swanage
- 1<sup>st</sup> 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.

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 checked="" type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , 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 MD Weller

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

Policy : <b>CEN</b>	Paragraph: <b>7.3.6</b>	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 <b>process</b> 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 <b>content</b> 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 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)

Wareham St Martin Parish needs affordable housing for its residents, having participated in a housing survey over 2 years ago. Sandford needs to be included when considering social or affordable housing.

**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).

Some development will take place in Sandford, Stoborough and Ridge .....

**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 : <b>CEN</b>	Paragraph: <b>7.3.8</b>	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 <b>process</b> 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 <b>content</b> 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)

Wareham St Martin Parish Council strongly supports the increase from 40% to 50% affordable housing.

**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 :  DH	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 <b>process</b> 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 <b>content</b> 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)

Wareham St Martin Parish Council is concerned that there are very few areas available for affordable housing development due to the 400m buffer around protected heathland. There are brownfield sites (Coastal car sales site, Overhill Engineering site) and open sites (alongside Sandford Hotel) that could be developed but due to the buffer zone they are excluded.

**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).

Page 66 - Residential (C3) development that would involve a net increase in dwellings only after each site has been independently and individually investigated for impact on local designated land and proven through credible evidence to have adverse effect upon the integrity of the Dorset Heaths' International designations.



# Wareham Town Trust

## WAREHAM TOWN TRUST

December 19, 2010

Mr Steve MacKenzie  
Chief Executive,  
Purbeck District Council  
Westport House  
Worgret Road,  
Wareham  
Dorset

Dear Mr MacKenzie

### Planning Purbeck's Future

I refer to the current consultation on the pre-submission draft Purbeck Core Strategy and welcome the opportunity to give the views of Wareham Town Trust. The changing national context would bring into question a number of the assumptions made in developing this strategy, in particular the number of homes to be accommodated, which was based on the former Regional Spatial Strategy.

I wish to comment on three aspects of the Core Strategy: the proposed moving of the green belt boundary at the western edge of Wareham, the evidence base in respect of retailing and housing allocations in Wareham.

**1. The Green Belt**  
Wareham's green belt preserves the setting and special character of our historic town. It also protects much needed playing fields. Proposals in the current consultation propose to roll back the green belt would set a dangerous precedent for continuing to move the boundaries of our town. The current proposals are based on the housing figures set out in draft Regional Spatial Strategy (RSS) to accommodate some 2,100 new dwellings in the period to 2026. Providing this scale of development in one of the most environmentally sensitive areas of England was clearly going to be a huge challenge. As the Secretary of State announced on 6<sup>th</sup> July "Councils will now be free to protect Green Belt surrounding 30 towns across the country. The targets system forced them to redraw Green Belt boundaries and designate large areas of countryside for new development. Communities will now have the power to prevent encroachment on the Green Belt...". As you know we recently lodged a petition with over 1500 signatories objecting to the rolling back of the green belt at the western edge of Wareham. This boundary has previously been successfully defended by the district council at 3 planning appeals and I am not aware of any relevant circumstances having changed to justify moving it. I would be grateful if the petition previously submitted by Wareham Town Trust at the Council meeting on 5<sup>th</sup> October be also included as evidence to the Inspector at this pre-submission stage. The petition signed by over 1500 people objected to: 1. The out-of-town supermarket for Wareham and 2. The proposed rolling back of the green belt for new development.

### 2. Retail Evidence Base

Chair: Alan Tubbs 01929 554188  
Hon Sec: Hilary Evans 37 East Street, Wareham BH20 4NW  
01929 551828 [hilary@eaststreet.plusnet.com](mailto:hilary@eaststreet.plusnet.com)  
[www.warehamtowntrust.org.uk](http://www.warehamtowntrust.org.uk)

We welcome the decision of the district council to not include an out-of-town supermarket for Wareham in the Core Strategy. It is clear that such a proposal would have had a devastating impact on Wareham town centre. This was borne out by the Retail Impact Assessment which confirmed that the impact would be considerable and likely to result in a high proportion of town centre trade being adversely affected. Whilst recognising the significant impact such a proposal would have had the Retail Impact Assessment 2010 surprisingly concluded that "Wareham Town Centre is concluded as healthy and could sustain the introduction of a new food store without significant adverse impact, provided the sale of non-food goods is restricted to 25% and the store does not include pharmacy, post office, optician or dry cleaner." Whereas the previous study by Nathaniel Litchfield and Partners carried out in 2008 concluded that *"the Council will need to carefully consider whether the qualitative benefit to residents as a whole and the potential to reduce outflow of convenience expenditure would outweigh any potential for harm on the vitality and viability of the town centre."* Previous conclusions by planning inspectors in 1992 and 2002 similarly have advised strongly against the provision of an out-of-town supermarket at Wareham due to the disastrous impact such a proposal would have on the town centre, irrespective of "need". It is obvious to anyone with a knowledge of businesses in Wareham that many are suffering the impact of the recession, are vulnerable and as such any major supermarket development is inevitably to have a major impact on town centre trading.

As you know the Town Trust has carried out a detailed study of the Retail Impact Assessment which found it to be seriously flawed in many respects not least because the brief given to the consultants rested on the assumption that a supermarket was needed and therefore should be provided. The Updated Retail Capacity Study carried out in March 2005 by Drivas Jonas commissioned by the District Council covers the period up to 2016. Whilst an update may well have been needed to bring this up to date it is unclear why a completely fresh study was commissioned only 5 years later within the time frame for the existing capacity study.

With regard to the evidence base I would contest that the Updated Retail Capacity Study 2005 and Retail Study by Nathaniel Litchfield and Partners 2008 should be included as part of that evidence base. The flawed nature of the RIA 2010 should also be acknowledged.

### 3. Housing allocations in Wareham

With the scrapping of Regional Spatial Strategies there is not the imperative to allocate the numbers of homes previously agreed and in the context of this change there is a need to revisit the housing figures and reassess the amount of development which can be accommodated within the environmental limits of the town. I consider that the opportunities for first developing brownfield sites and other opportunities presented by the proposed change to two tier education have not been fully explored. Clearly there are a number of opportunities for development which would not involve rolling back the green belt and that these should first be fully investigated.

At the meeting of the district council the decision to allocate land at Worgret Road for the development of 200 homes was made without any clear justification. Having overturned the officer's recommendation for allocation of land for a supermarket and 100 homes within minutes a decision had been made to allocate the site for an additional 100 homes on this site without any discussion as to the basis for this. It would appear that this decision was made on an impulse and is fundamentally flawed.

Thank you for giving these points your careful consideration.

Now that the Localism Bill has been published and top down targets have been scrapped in favour of a locally driven approach I urge the district council to carefully consider whether now is the time to

December 19, 2010.

take stock and start on a new footing working closely with the local community. I understand that Weymouth and Portland has recently stopped work on its Core Strategy which had been developed to the same stage as that for Purbeck, in the light of the introduction of this new approach.

Please note that I wish to participate in the oral examination in order to object to the proposed moving of the green belt.

Sincerely,

Alan Tubbs, Chair, Wareham Town Trust.



# Warrington Mr & Mrs



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

4817  
20/12/10

Your Details	Agents Details (where relevant)
Title	Mrs + Mr
Name	WARRINGTON
Job Title (where relevant)	
Organisation (where relevant)	
Address	16 Kingswood Close
Postcode	BH19 2SP
E-mail	
Tel. Number	01929 423934

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

- 10<sup>th</sup> November, 7pm, District Council offices, Wareham
- 18<sup>th</sup> November, 7pm, Community Hall, The Mowlem, Swanage
- 1<sup>st</sup> December, 7pm, 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](http://www.dorsetforyou.com/purbeck_consultation), email or call 01929 557273 to speak to a member of the Planning Policy Team.

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 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	13 <sup>th</sup> 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 checked="" type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	---	---

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

Policy: SE	Paragraph: 4.2.1 + 7.5.9	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 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)

para 4.2.1  
There is very limited opportunity for employment in Swanage. So, this proposed increase in the size of 900 dwellings will neither retain nor enhance the town's 'unique qualities' for which visitors gravitate to. Other seaside towns such as Margate and Rhyl have suffered a similar demise through unemployment & Swanage already suffers from a lot of shop closings! Therefore, the Core Strategy is clearly not sustainable.



para 7.5.9  
consultation did not ask if people wanted  
200 houses on settlement extensions in Swanage.  
There was no chance to choose fewer houses  
nor was there a zero option.

**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).

4.2.1  
Create bulk of housing in economic growth areas,  
identified in the Core Strategy as Holt Heath + Winfrith.  
NB Where those inhabitants seeking employment would  
have better, easier access to travel to areas/towns  
such as; Poole, Bournemouth, Dorchester, Weymouth  
Wimbourne etc.

para 7.5.9  
Delete 200 houses on settlement extensions within 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 checked="" type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	---	---

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

Policy: ECS	Paragraph: 4.3.1. 4.1.2 + 4.1.4	Map: 13
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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 checked="" 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)

Map 13 - No consideration given to high level of second homes. The desirability of the area pushes up local prices and property is therefore unaffordable for many local people. A typical example locally is Worth Matravers where second home owners are only in residence on high days and holidays, leaving the village as a ghost village for most of the year.

Only 2.5% of employment land is in Swanage and 0.28% in Corfe Castle. That is less than 3% in Purbeck where it is proposed to allocate 37.5% of the housing provision. This clearly contradicts the stated aim of reducing car usage identified as a priority in the Purbeck Community Plan and a stated aim of the Core Strategy refs paras. 4.1.2; 4.1.4; + 4.3.1. High number of new homes and lack of employment opportunities is not sustainable.

**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).

Map 13 - Limit second home ownership.

6.5 2(b)

Create bulk of housing in economic growth areas identified in the Core Strategy as Holton Heath and Winfith.



**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 checked="" 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 : HS	Paragraph: 6.4.5 + 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 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)

6.4.5  
Not justified because unsound. Allocation of 900 units (37.5% of 2400) is not deliverable. The vast majority would be in Swanage. In 2002 - a Planning Inspectorate Report stated that no further building should happen in Purbeck until traffic congestion on the A351 has been resolved. At weekends and holiday periods the A351 is just one long car park emanating excessive air and noise pollution. Bussing children in and out of Swanage has compounded this too.

Habitat Regulations Assessment §. 52 states that (in respect of development in Swanage) there is a likelihood that development will have an adverse effect on protected habitats. The mitigation proposal for Sites of Alternative Natural Green Space (SANGS) is not deliverable in Swanage, which is situated within an AONB which should be protected at all costs.

**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).

6.4.5 Housing should be closer to economic growth areas, identified in the Core Strategy as Holt Heath and Wimth.

6.3.4. No more building on green field/AONB sites and limit infill to affordable housing for local people.

Note: Additional sheets can be photocopied and attached to this form



6371  
20/12/10

JANET WATTS  
*Writer and Journalist*

December 20, 2010

Planning Policy Dept, Purbeck District Council  
Westport House, Wareham, Dorset BH20 4PP



Dear Sirs,

**‘PLANNING PURBECK’S FUTURE’: CORE STRATEGY DEVELOPMENT DOCUMENT**

I write to object to the process of, and proposals within, this consultation document.

**a) Objections to the process**

- 1) I received no information leaflets from Purbeck Council at the address below.
- 2) I gather that these were sent out enfolded in a local freesheet. This is an unsuitable way to distribute an important public communication.
- 3) The first information I received of this matter was a hand-distributed note of a public meeting on the subject held by Swanage residents on 25 November 2010.
- 4) This meeting made it clear that residents should read the DPD immediately and carefully, as the deadline for public comment was 20 December. But the DPD’s price, at £12.00, is prohibitive and inappropriate for a document of public consultation.
- 5) Some 40% of Swanage residents have no personal computer to access the document online, let alone its succeeding amendments. It was unavailable for loan at the public library, at present replaced by an unheated mobile vehicle without reading facilities, which has itself been absent in recent bad weather.
- 6) The DPD itself and the prepared response forms are incomprehensible to people without experience of planning law, nomenclature and procedures.
- 7) Residents with profound, serious and valid concerns cannot express them by ticking boxes to answer formulaic and leading questions.
- 8) All these facts represent failures of legal compliance in the process.

**b) Objections to the proposals**

- 1) In its ‘Vision for South East Purbeck’ (7.5.8) the DPD states:  
*‘Swanage will retain its status as one of Dorset’s most self-contained settlements, whilst enhancing the special historic character of the town and its setting within the Area of Outstanding Natural Beauty and the Jurassic Coast.’*

This sounds reassuring. Yet the DPD lumps Swanage with Wareham (and less clearly with Upton) as necessarily ‘the focus of the majority of development [in South Eastern Purbeck] as befits their respective roles as market and coastal towns’ (5.2).

This ignores its own acknowledgement of the unique quality of this small, delightful and popular seaside resort, and of the internationally-recognised beauty and environmental and historic importance of its setting, one of a small handful of UNESCO-designated World Heritage Sites in the United Kingdom.

*(continued)*

1 GROSVENOR ROAD • SWANAGE • DORSET • BH19 2DD  
TELEPHONE • 01929 427774



2) The DPD also ignores the implications of its note in **Map 13** that Swanage is located *'at the end of a giant cul-de-sac (A351)'*. This fact led a Planning Inspectorate report to conclude in 2002 that no further building should take place in Purbeck until traffic congestion on the A351 had been resolved.

The long-promised reopening of the Wareham-Swanage railway line would be welcome. But in reality most people will still choose to make the journey by car if they have one. 'Improvement' of the 'A351 Corridor' would eat into a unique environment to introduce a wider, faster and more dangerous road that would change the nature of the landscape, atmosphere and landmarks of the Isle of Purbeck which it would traverse.

3) The DPD notes that *'900 dwellings are required to meet housing supply needs'* in the Swanage area within altered settlement boundaries by 2026 (7.5.9).

The DPD does not provide evidence of public demand for this level of housing supply or identify the sources of its calculation of this number of new dwellings. It does not specify the individuals or bodies that require such supply, or detail such public approval of the planned development as it purports to be investigating.

Who will buy these hundreds of new dwellings? The DPD notes that the average house price is 11 times higher the average national wage (£22,880) of people living in the District; 7% of its dwellings are second homes, some 7.7 times the national average. (2.4)

At a conservative estimate, the provision of 900 new houses will increase the population of Swanage (at present around 10,000) by 2,000 in 15 years. The equivalent increase took place over 80 years between 1921 and 2001.

It is widely recognised that the infrastructure and employment opportunities of Swanage are already inadequate to meet present needs. The DPD proposes to extend the existing Prospect Business Park, which is under-occupied. Changes in the local schools mean that there will soon be no secondary education provision in Swanage. The increase in houses and population is likely to exacerbate the factors now turning Swanage into a dormitory town for people working elsewhere, and a haven of second homes for the wealthy.

Swanage is a precious place, recognised as such by a spectrum of bodies ranging from Purbeck District Council to the UNESCO. Yet it is also vulnerable to destruction by traffic, car parks, pollution, and the 'ghost town' effect of the second home market. This proposed development of housing would irrecoverably damage the town's unique character within its beautiful setting, on which many of its residents' livelihoods depend.

I ask the Inspectorate of the GOSW to prevent such destruction, and thereby to safeguard the unique heritage of Swanage and the Isle of Purbeck as a whole.

Yours sincerely

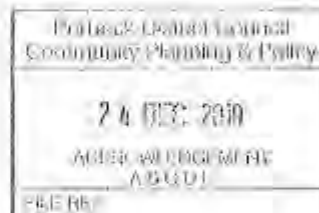
Signature has been blanked out

Janet Watts

0749



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



13 December 2010

Dear Sirs

**Core Strategy Consultation – Response by the Lulworth Estate**

We are grateful for the opportunity to comment upon the final draft 'Core Strategy' ahead of submission to the Secretary of State.

The document itself is the culmination of five year's work and undoubtedly a great deal of thought and research has gone into its drafting - we congratulate the Council on the perseverance shown throughout this lengthy process.

The Estate does not wholly agree with certain key approaches and policies incorporated into the framework, but it is recognised that the willingness to revisit or amend certain aspects of the content is now much restricted. However, we hope that the commentary provided in the attached response may yet help to shape and streamline policy.

Since the start of the Core Strategy process there has been significant changes both economically and politically and in looking ahead it is my concern, that whilst the document may be reasonably reflective of the present situation, it may soon become dated and 'out of step'. I would suggest as such that at set intervals (5 years) the Council considers if the 'Strategy' remains 'fit for purpose' and credible in relation to the pressures of the time.

I hope that the enclosed response is of interest.

Yours sincerely

Signature has been blanked out

James Weld

The Weld Estate, Lulworth Castle, East Lulworth, Wareham, Dorset BH20 5QS  
Telephone: 01929 400352 Fax: 01929 400563 www.lulworth.com  
VAT Number 186 3773 24



Purbeck District Council

Thriving communities in balance  
with the natural environment



## Core Strategy Planning Purbeck's Future Final Consultation Response, December 2010

Please send your completed form back, by **20th December 2010**, to:  
Planning Policy Team, Purbeck District Council, Westport House, Worgret Road,  
Wareham, Dorset, BH20 4PP  
E-mail: [ldf@purbeck-dc.gov.uk](mailto:ldf@purbeck-dc.gov.uk)

### Vision for Purbeck



1. Do you agree with the District Vision?

Yes

The vision for Purbeck on a district wide basis is commendable. We support the aspiration to stimulate well paid and diverse employment opportunities and welcome recognition to the fact that, agriculture, farm diversification and estate management should play a part in achieving this.

### Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes & No

**We support the visions for Swanage and Wareham, but not Wool.**

#### Central Purbeck – Wareham:

The principal of enhancing Wareham's position as an important service centre in Purbeck, is sound, and we believe essential to meeting Purbeck's wider community aspirations. The Town is of strategic importance to the area, because of its relative accessibility from all parts of the District - it is therefore logical to further develop its role in this regard.

#### South East Purbeck – Swanage:

Mention is given to the fact that Swanage is considered one of Dorset's most self contained towns. Again, this is a significant factor in assessing the role of the settlement in the context of a District Strategy. Due to geographical constraints the town is less accessible than Wareham and as is identified in its description, has developed a self sufficient character. Further provision of services, facilities and shops would benefit the town and help ensure that it retains a sense of vitality and remains well placed to compete for tourist trade, but residential expansion is out of tune with the principals of sustainable development.




### South West Purbeck – Wool:


Wool is a prominent settlement within Purbeck and its identity as such can and should be supported. The spatial vision underplays the relative importance of settlement and the role that it could fulfill in meeting community needs and compliance with sound sustainable planning (please see 4a).

In all aspects Wool's connectivity / accessibility by road and public transport networks is superior to Swanage and at least equal, if not, better than Wareham.

### Spatial Objectives

 3. Do you agree with the Spatial Objectives?  
Yes

### Policy LD – Location of Development

 4 (a) Do you agree with this policy?  
Yes

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?  
Yes subject to reservations:

We agree that Key Service villages and small towns should be the focus of development. However, there is a danger that settlement classification doesn't allow for the flexibility within the planning system that is required to work around area constraints specific to Purbeck, nor aid the meeting of district needs.

Wool is currently, listed as a 'Key Service Village' it actually holds the latent potential to be more than that. This potential is provided through the fact that the settlement enjoys:

- Superior transport links
- Employment opportunities now and into the future
- Community infrastructure (Schools, modern Doctors Surgery etc)
- Space and spreading room
- Proximity to the Jurassic Coast
- Reduced conflict with the environment, AONB, Heathland, flooding etc.
- Compliance with the principals of sustainable development

It is vital to acknowledge this scope and plan for advancement within the Core Strategy. An overly restrictive approach based on classification will not allow for full longevity planning, and might result in piecemeal development as opposed to the pursuance of a sound and sustainable master plan.

N.B According to County Council 2008 statistics, Wool had an estimated population of 4,400 living in 1,932 dwellings. In its own right, this is the fourth greatest population per settlement within Purbeck (only 1,364 less than Wareham). Insufficient recognition is given to the relative importance of Wool as a leading settlement within the document.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

No

Whilst we do support the principal of nurturing affordable housing delivery through a range of mechanisms. It is not practicable to prescribe that only affordable housing should be allowed in those villages not listed under Policy LD. The reasons being that the incentives for Landowners to sell land under Rural Exception Site circumstances are not sufficient to induce delivery. Most landowners will simply not sell land at £15,000 per acre or thereabouts, when they are likely to get taxed on gains and incur professional fees. By way of context sale prices for grass paddocks for horses are likely to be twice the value of RE sites alone.

The only practical way of achieving affordable housing through conventional means (please see comment 14) is to allow a proportionate amount of market housing alongside and in support of affordable housing. Furthermore, such stringent policy may be considered to be protectionist and not necessarily in the long term best interests of a community as it is not consistent with an open and progressive outlook.

#### Policy HS – Housing Supply



5. Do you agree with this policy?

Yes

#### Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

Yes subject to reservations detailed below:

The table clearly demonstrates how the Council has arrived at its appraisal and sets out with clarity what factors have been taken into account.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

No

50% is not a suitable, it is most unlikely that half of the total infill land will come forward. It would be more prudent to assume that only 40% of sites will come forward and be found viable for whatever reason. The document itself sites that 'windfall / infill' predictions are extremely difficult to make with any certainty.

Similarly, it is also most unlikely that 201 of the remaining 5 year supply will come forward when predicted. Landowners, will naturally, wish for sites to be considered as being part of the short term supply, but for their own reasons (macro economic pressures for instance) may not promote them within the five years. Again, this would further reduce the housing supply.

#### Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions?

No

A phased approach, would not be in step with broader planning policy, which requires that both brownfield and greenfield sites are allowed to come forward in tandem and will be considered on their own merits.

Phasing would potentially 'black patch' greenfield sites; accordingly, a phased approach, will not be capable of bringing through the required supply, further compounding problems with housing stock shortages.

#### Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes

The Winfrith Technology Centre is one of Purbeck's foremost employment opportunities. The site represents a work hub and a means of diversifying the districts economic base (as established in 6.7.1 of the draft Strategy). It is also a relative blank canvas that can be structured and styled innovatively. This fits with the Purbeck vision to sustain a culture of enterprise.

It is accepted that the site is a result of circumstance as opposed to projected planning, but the potential that it could fulfill now is of fundamental importance to the self sufficiency of Purbeck. For employment purposes only, the site meets the criteria for satisfying core principals of sustainable development. Mainly due to the existence of established transport links, proximity to Wareham, green credentials, its overall setting, but most notably the sites interconnectivity with Wool (which can be considered a main settlement with scope for expansion).

The prospect of creating an exemplar enterprise and employment site at the Winfrith site should be further reiterated and supported within the Strategy.



8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

**Yes these sites should be the focus of Purbecks employment effort**

As described above, the inherent potential of Winfrith and the other sites are such that they should remain the focus of the Districts employment effort. We would disagree with the suggestion that Winfrith is remote, it is in fact immediately adjacent to Purbeck's fourth largest conurbation and mainline railway (unlike Swanage). Moreover, Wool is not under the same conditions of constraints that restrict options for many parts of the district, including the AONB, flood risk, heathland etc. There is therefore considerable prospect for the settlement to expand in harmony with the employment site.

### Development Options



#### 10 (a) The Council has set out its philosophy for development in the District – commentary:

Whilst it is entirely sensible and logical that Swanage would have a role to play in delivering infill development, a policy geared towards a concentrated growth effort in this area would seem not to take account of the relative isolation and constraints of the town.

The geography of the area is such that there is sea entirely to the East and South, as well as Poole Harbour to the North. This effectively limits functional access to the western road network, which due to the sensitivity of the towns setting offers little potential for widening and expansion. The train facilities are also limited, being only a vintage route primarily for the benefit of tourists.

The draft strategy itself, identifies that the town has a self sufficient character, doubtless resulting from the fact that it is relatively isolated. In the context of the above it is difficult therefore to see the justification in pursuing long term growth in the area. Perhaps instead, the focus for the town should be on the consolidation of its current position and inward investment to ensure that it remains vibrant.

It would therefore be more logical to link development attention to the main transport arteries leading to and from Wareham, as well as focus on Wareham itself. A sequential approach would suggest that Wool would be more appropriately placed for providing housing need than Swanage. Not least because of the position of the settlement on the link road between the larger conurbations of Dorchester and Poole / Bournemouth and of course Wareham and Winfrith Technology park.

### Policy CO - Countryside



#### 11 (a) Do you agree with this policy?

##### Yes with reservations

We would fully support a broad minded approach to the review and granting of planning permission for rural premises. The requisite conditions, upon which permission may be given, are sufficiently wide to encompass a variety of business types – which is positive and should be welcomed.

A vibrant rural economy is depended upon this flexibility, accordingly planners should be encouraged to consider Countryside development liberally, particularly in the context of the re-use of traditional structures.

However, we do hold reservations about the sequential hierarchy for re use (please see below).

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

No on three points:

- 1) The principal of rigidly applying a sequential hierarchy for use class / type, is inflexible. We would recommend instead that a preference is noted in the policy, but each and every application should be taken on its merits and viewed in the context of the character of the property and its location rather than a great deal of dependence on its categorisation. Perhaps the Policy could be worded:

*"A successful application will need to demonstrate that the intended use class is character appropriate with the site and works in harmony with the wider setting. Preference will be given to uses that fulfil the above criteria but also bring employment prospects and contribute positively to the local economy. If a site is reasonably considered unsuitable for the employment usage whether use class types A or B, then the site should be considered potentially appropriate for tourist and general accommodation".*

- 2) The draft policy establishes that the second most desirable use of rural buildings coming forward would be affordable housing. This we feel is unrealistic and would field less community opportunity than tourist accommodation which is written as being less favored. Tourist accommodation provides some employment opportunity and would be more advantageous to the local economy.

Moreover, Landowners of all scales would be challenged to consider the disposal of existing rural buildings for affordable housing, principally due to the fact that the revenue yielded would be disproportionately low. Also in a practical sense, it is nonsensical to consider the conversion of buildings for affordable housing, as the building costs associated with the work are considerably more costly than new build (albeit renovations for affordable use are zero rated for VAT). They would also, most likely, not be compliant with building regulation sustainability thresholds for affordable units.

- 3) If this policy is not amended it will form a considerable hurdle in meeting the desired 'vision' as set out in the front of the document – how can the local council overlook tourist accommodation and related 'farm diversification' whilst removing this as a supported development preference?

11 (c) Should other uses be considered for the re-use of rural buildings?

Yes

Please see above.

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes

- 1) **Transport and Infrastructure:** It is an unfortunate fact that increasingly rural areas are dependant upon the use of cars. Notably in Purbeck, village transport / bus links have been run down so that they are no longer regular and in many cases need to be



booked in advance of use. As accessibility is a fundamental consideration in any planning matter, it is important that applications are not unreasonably held back because of a lack of transport options.

- 2) **Renewable energy and green waste treatment:** The countryside can provide the space and means to host important renewable projects of varying scale. Whilst it is recognised that the range of technologies is diverse, and not all would be appropriate for certain areas. It would be sensible for the CO Policy to touch on this matter from the planning perspective. Quite often the technologies are closely connected to rural industries (agriculture / forestry) and it is important that a holistic planning perspective is maintained in this regard.

Projects must, of course, be appropriate in scale and type!

#### Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

Neutral

We neither agree or disagree with this policy. In respect to the treatment / allocation and classification of affordable housing, we would refer the Council to the recently published 'Draft Statutory Guidance on Social Housing' as provided by the Minister of Housing.

In essence, local governments are encouraged through the revised guidance to tailor their policies for the treatment / allocation of affordable housing to their specific needs. It endorses a flexible innovative method – where the approach taken by the local authority will have been developed specifically to meet the needs of the local area in the context of the areas constraints.

Clearly there is a further need for PDC to consider and consult on the policies that it could adopt in respect to affordable housing, but it should be recognised that this is an important opportunity in planning terms.

Therefore, we would suggest that the Core Strategy only deals with the most fundamental questions on affordable housing rather than housing mix etc, as this should be subject to separate examination.

#### Policy AH – Affordable Housing



14. Do you agree with this policy?

No

##### Summary

The proposal set out by the council to impose a 40% / 50% (depending on spatial location) element of affordable housing on all developments and any scheme over 2 units or 0.05ha, is simply untenable.

This policy, if pursued will likely cause the following:

- developers avoiding Purbeck;
- landowners choosing not to release land;
- poor quality construction and design;
- cumbersome and ill informed and ineffective fiscal / market control;
- deficit in meeting key community housing needs;
- loss of construction related jobs and restriction of employment opportunities in the area.

If, such proposals were to go ahead, land resources being made available for development would 'dry up' or certainly at least be severely constricted. As a consequence the amount of affordable units coming forward would be much diminished and the issue of affordable housing only compounded. The adverse impact of these proposals should not be underestimated.

The Lulworth Estate would not be able to release land for development, regardless of its location, where the District Council is demanding 50% affordable development element.

The costs associated with development have increased dramatically over the last decade principally due to increases in burdensome contributions, levies, charges and taxes. Affordable housing is one such issue that represents a considerable construction / opportunity cost for those operating in the sector. The financial impact of increasing the affordable element to 50% will reduce profit margins to a level which is no longer a suitable incentive for the permanent surrender of land.

***An open book approach:***

An open book approach, would represent a most damaging precedent that works against some of our societies core values and principals. It is not reasonable nor fair, that individuals and companies be subjected to scrutiny on their own financial risks and prospected rewards by local councils. Ultimately, this approach will lead to the council setting a level of 'acceptable' reward which is not compliant with free market conditions.

Again, this will only prove to discourage investors / developers and Landowners from engaging in house building activity.

***Passing on of costs – land vendor pays not developer:***


A requirement to deliver 50% affordable element cannot, especially in the present economic climate be withstood commercially in the sense that almost all developments would be rendered economically unviable. In turn, developers would look to offset the increased costs of development / reduction in profit through the lowering of the price paid for development land. All 'on costs' associated with this policy including highways contributions, heathland contributions, community infrastructure etc, are discounted against the price paid for land.


In short, there is a presumption that the developer pays, this is not correct as in fact the land vendor ultimately pays through a reduction in sale proceeds. Soon costs will be so extensive it is likely that those with strategic land may be compelled to withhold resources on grounds that a suitable return cannot be achieved.


**Conclusions:**

Landownership is a long term investment and capital receipts from development form part of the capital policy of our business. In the last 15 years we have invested on average in excess of £1 million per year, increasing employment by 400% each year and now operate with a total workforce of 200.

An effective increase in 'taxation' to as much as 70% of gross development value (all levies and contributions) would render any capital investment program unsustainable with the inevitable consequence of stagnating housing, economic growth and employment. This proposed policy would undoubtedly have the opposite result to the one you are attempting to achieve, and would reduce further the supply of affordable housing.

Policy RES – Rural Exception Sites	
	<p>15. Do you agree with this policy?</p> <p>No</p> <p>Paragraph 8.5.1 makes an ill-informed statement as follows:</p> <p><i>"Rural exception sites work because land owners are willing to sell their land at substantially less than its open market value for new housing. They do this because the land coming forward will not obtain planning permission for market housing therefore exception sites offer the best value obtainable".</i></p> <p>This statement cannot be supported. I would imagine that that there are very few situations where RE sites have been shown to work effectively on the basis that the land vendor feels that that the proceeds generated through the sale truly represents best value (please see 4c).</p>

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People	
	<p>16. Do you agree with this policy?</p> <p>Neutral, subject to consideration of site location</p>

Policy WHN – Wider Housing Needs	
	<p>17 (a) Do you agree with this policy?</p> <p>Yes</p> <p>17 (b) Are you aware of any other specific housing needs that should be addressed?</p> <p>Yes</p> <p><b>Village rental accommodation:</b></p> <p>It should not be forgotten that Purbeck is a district of rural character. A significant proportion of the population live and work in the countryside. Family associations with the area (or indeed particular villages) are often strong and there is an ever present and increasing demand for village homes for people to rent.</p> <p>Due to the nature of their business and interests, Rural Estates play a key role in the provision of housing stock for the local community and their employees. However, the pressures on housing and the expansion of rural jobs requires a greater degree of consideration in order to match provision against need.</p> <p>Employee housing is often provided on concessionary rents to ensure that they are affordable, although sadly this is often over looked by authorities.</p>



The basis of letting homes on an affordable private sector basis can create problems with maintenance funding, but is never the less viewed as an important part of achieving community sustainability. As this need remains high, it would be desirable to allow more localised housing to come forward on tenanted basis.

Conventional Rural Exception Sites, do not offer a solution in this context. Instead, the Lulworth Estate has put forward proposals for a hybrid rental scheme, which in affect would increase stock for employee housing and local / village community need housing. A proportion of market rental units will also need to be constructed within any application to ensure long term viability.

**These proposals were accepted by the former Housing Minister and have been legally scrutinised and accepted by PDC. There is no reason why the Core Strategy could not support the principal that such models are of value to Purbeck and should be encouraged where appropriate.**

**Please refer to previous correspondence between the District Council and the Estate on this matter.**

#### Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes with reservations

We would welcome the continued recognition and protection of Purbeck's natural heritage and wildlife. It is of course important that this protection is in balance with the human needs of the community. This is a challenge which can be achieved, but in the context of the level of protection afforded for multiple reasons to such a breadth of Purbeck, is not a simple matter.

It should be noted that the layers of designations often overlap and navigating through the mechanics and management of the schemes can often be confusing and difficult. There is an argument for simplifying this process. For instance, SNCI's are locally administered designations, that do not hold statutory provisions (unlike SSSI's as their national counterparts), in Purbeck SNCI's fairly well overlap with SSSI designations we therefore question the need for their treatment as a separate matter.

### Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

No

As referred to above, we support the protection and enhancement of Purbeck's natural heritage. Specifically in respect to heathland, we recognise that it is type of habitat that can suffer markedly through human pressures. The need to protect the habitat is certainly required where heaths are particularly susceptible to usage pressures (for instance where they are immediately adjacent to widespread conurbations with limited access to other countryside – urban heath).

In Purbeck we are fortunate to have many small areas of heathland and for the most part they would not suffer detrimental affects through house building within 5km. There does seem to be a presumption that the problems that are apparent on urban heath are seen also to the same extent on rural heath areas. We would suggest that this is not the case at all. We feel that the current approach (further supported by the Core Strategy) is a 'one size fits all' methodology with no real understanding of the changing characteristics and problems encountered on any given heath (many heaths suffer little or no adverse human impacts). In summary, it is our feeling that this is principally an urban problem, which is being unfairly shared by rural districts.

As a side note it is ironic that the CROW act 2000 has established a public right for unrestricted public access to heathland, but yet in the same breath local governments are obliged to seek a tariff on development (up to 5km away) to mitigate human impact on heath.

We would request that the council reconsider a more flexible and discretionary policy than the one carried by the Core Strategy for house building in excess of 400m from heath.

### Policy RP – Retail Provision



20. Do you agree with this policy?

Yes

There is a very apparent need and opportunity for increased retail provision at Wool.


### Policy CF – Community Facilities and Services





21. Do you agree with this policy?


Yes


In principal, we support and agree with this policy. We would suggest though that planning for facilities and services, should be undertaken with an eye on the expected growth in places like Wool, where the settlement is likely to experience significant expansion over the long term.

<b>Policy GI – Green Infrastructure, Recreation and Sports Facilities</b>	
	22. Do you agree with this policy?
	Yes
	Provided that the contributions made would not be additional to existing 'section 106' requirements and that the value of the contributions are proportionate to the scheme.


<b>Policy FR – Flood Risk</b>	
	23. Do you agree with this policy?
	Yes


<b>Policy GP – Groundwater Protection</b>	
	24. Do you agree with this policy?
	Yes


<b>Policy CE – Coastal Erosion in Swanage</b>	
	25. Do you agree with this policy?
	Neutral

<b>Policy SD – Sustainable Design</b>	
	26. Do you agree with this policy?
	Yes
	The council is right to resist implementing more exacting standards relating to ecological design, until there is certainty as to the benefits of new technologies, longevity of design and cost effectiveness. Whilst we must be sufficiently bold in tackling carbon release, there is a danger that affordable housing will be the 'guinea pig' of the housing sector, making it vulnerable to changes in approach and technologies being found to be unsound.
	We should also be mindful that increased standards add to construction cost, making affordable housing actually less affordable.



Policy REN – Renewable Energy	
	27. Do you agree with this policy?
	Yes
	Please see Question / Answer 11(d).

Policy HLH – Historic Environment, Landscape and Heritage	
	28. Do you agree with this policy?
	Yes
	The Core Strategy does not in this policy refer to central government planning policy (PPS 15) or guidance from English Heritage – this should be corrected.
	Many 'Heritage Assets' have the potential to be adopted for the performance of modern activities, be it work / business or simply living. Whilst we fully support the principle of safeguarding and maintaining our heritage, we would suggest that there is a need to be wary not to put to apply measures of protection that are so restrictive that they block viable contemporary use. This perspective is echoed in the national policy documents and in EH's principals of 'Constructive Conservation'.
	It should be recognised, in many regards, the best way of protecting a structure is to ensure that it is given a purpose and usefulness that can justify special maintenance considerations.

Policy E – Employment	
	29. Do you agree with this policy?
	Yes
	Please see comments regarding Winfrith Technology centre.
	We would also welcome the potential for the conversion of redundant rural buildings for viable contemporary employment use.

**Policy TA – Tourist Accommodation and Attractions**

10/11

30 (a) Do you agree with the policy wording?

No

The wording in its present form is too restrictive, in that it may inadvertently curtail site improvements for existing camping and caravan sites. Many of these established sites in Purbeck have been running for many years, and provide an important and valued capacity for tourist accommodation. It is inevitable that in order to keep sites functional and sustainable, improvements in site infrastructure and facilities will be required. Provided that such improvements are in keeping with the area, they should be encouraged by policy.

We would suggest that an additional bullet point is included as a justification for site alteration, to the effect that the proposed works can be demonstrated as a site improvement fulfilling an established need, and not at the detriment of the local setting or amenity.

30 (b) Should new tourist accommodation be allowed within the AONB?

Yes

**Policy IAT – Improving Accessibility and Transport**

07/11

31. Do you agree with this policy?

Yes

**Policy AP – Implementing an Appropriate Transport Strategy for Purbeck**

07/11

32. Do you agree with this policy?

Yes

**Sustainability Appraisal**

07/11

33. Do you have any comments on the Sustainability Appraisal?

Comments:

NO

## Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	Mr	Agent Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	Mr
First Name:	James	Agent First Name:	Patrick
Last Name:	Weld	Agent Last Name:	Durnford
Job Title*:	General Manager	Agent Job Title:	Assistant to GM
Organisation*:	Lulworth Estate	Agent Organisation:	Lulworth Estate
Address:	The Estate Office East Lulworth Wareham Dorset	Address:	The Estate Office East Lulworth Wareham Dorset
Postcode:	BH20 5QS	Postcode:	BH20 5QS
Telephone:	01929 400352	Telephone:	01929 400352
E-mail:	James.weld@lulworth.com	E-mail:	Patrick.durnford@lulworth.com

\*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations?    Yes    (Delete as Appropriate)



# Welfare Dwellings



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

	<b>Your Details</b>	<b>Agents Details (where relevant)</b>
Title	Mr	Mr
Name	David Hensher	Malcolm Brown
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Welfare Dwellings Residential Care	Sibbett Gregory
Address	21 Dorset Square, London	3 Winchester Place, North Street, Poole
Postcode	NW1 6QG	BH15 1NX
E-mail		malcolm@sibbettgregory.com
Tel. Number		01202 661177

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

- 10<sup>th</sup> November, 7pm in the District Council offices, Wareham
- 18<sup>th</sup> November, 7pm, Community Hall, The Mowlem, Swanage
- 1<sup>st</sup> 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](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 Plan as drafted is not sound. The Consultation process was flawed at the last moment and the Council were influenced by a small minority against the interests of a significant stakeholder and the Respondents will demonstrate that the submitted document is unsound, because it ignores the evidence base in a significant respect.

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 16/12/10
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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 checked="" 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: Inset Map 5
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <b>process</b> 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 <b>content</b> 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 distribution of the housing development contains an imbalance and is unsound. It proposes 200 houses at Wareham in the period 2012-2016. That is unlikely to happen because the rate of construction would be too fast for a town such as Wareham. At the same time, there is no reason why Swanage cannot deliver housing, including affordable housing in the same period 2012-2016 if allocated now. It is inconsistent to identify strategic housing allocations at Wareham and Lytchett Matravers where the allocation is just 50 dwelling units and not at Swanage. The proposed housing numbers for Swanage are the same as those for Wareham and four times those for Lytchett Matravers. There is no justification in the evidence base for not treating Swanage in the same way.

Core Strategy Background Paper Volume 5: Housing Supply demonstrates a logical process towards identifying sites for housing, with the Housing Needs Survey in 2006, Strategic Housing Market Assessment in 2008. The work on the proposed Review of the Regional Spatial Strategy led to a proposal for 2,400 dwellings in Purbeck, in addition to a new allocation of 2,750 dwellings. Since the Review of the Regional Spatial Strategy is not proceeding and the Western Sector allocation had been opposed by Purbeck District Council, it has continued with a figure of 2,400 dwellings. A Residential Development Economic Viability



Assessment was carried in 2008 and updated in 2010 and housing growth scenarios were tested by the Local Planning Authority. Nine options for the Development Strategy were considered by the Local Planning Authority. As a result of consultation, shortlisted three options to be taken forward for Public Consultation in the Autumn of 2009. The Preferred Option was to distribute development around Swanage, Upton, Wareham and the Key Service Villages of Bere Regis, Lytchett Matravers and Wool. The Preferred Option received 63% support from the Consultees. Following on from that Consultation, the District Council undertook a further Consultation with the public as to where development should be built in Purbeck. Four sites were put forward for Consultation at Swanage, Site D receiving 85% support in the Responses. The Respondent's land forms a significant part of Side D.

**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).

Amend the Table showing Housing Development distribution to reduce distribution at Wareham from 200 down to 100 in the years 2012-2016, and 100 in the ensuing 5 years, to increase the settlement extension at Swanage to 100 in the years 2012-2016 and 100 in the ensuing 5 years. The settlement extension at Swanage should be noted as a Strategic Allocation in the Core Strategy rather than a non-strategic allocation through the Site Allocations Plan. Reinstate Draft Inst Map 6.

**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 checked="" type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
--	---	---

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

Policy : ELS: Employment Land 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 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 Employment Land proposals for Purbeck fail to take account of the background information, which shows that tourism makes a significant contribution to the Purbeck economy and that the main growth sectors are in service industries. Work for the Regional Spatial Strategy identified that a large area of employment growth is in non-B Class Uses.

The Employment Land Supply policy in the Core Strategy is based entirely on B Class Uses and fails to recognise the employment generated by non-B Class Uses.

Chapter 3 of the Core Strategy is headed "Issues and Challenges". It asks the question "How can we provide new employment, shops, community facilities and services that are accessible for those without a car?" One of the most important considerations is to ensure that the employment meets the needs of the locality and that the jobs created will be likely to be fulfilled by local people.

There are uses which exhibit mixed characteristics, uses which provide residential accommodation and employment, for example, such as Care Homes. The Core Strategy is inflexible in its policies and ought to

contain provision which would enable such uses to be developed in appropriate locations. Policy E: Employment should be amended to reflect this opportunity.

**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 Policy E: Employment add a new category to encourage non-B Class Uses which generate significant levels of employment in appropriate locations throughout the Plan area.



**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 checked="" 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: 14 (Draft) Inset Map 5
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <b>process</b> 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 <b>content</b> 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)

Purbeck District Council has consulted widely on the housing allocations for Purbeck and, in particular, Swanage. Specific sites were identified in Swanage and were the subject of a Public Exhibition. The Core Strategy Background Paper Volume 5: Housing Supply shows that the Grammage School site (Site D) received 85% support from the public. The Consultation Document assessed four sites - A-D, against six criteria:- ecology, flood risk, townscape, landscape, accessibility and highways and it gave an overall rating. It indicated those sites with least impact, those with some impact and those with major impact. In five out of six categories, Side D was shown to have least impact, with only some impact in respect of flood risk. That was only a question of needing to plan for surface water run-off which would have been equally applicable to any of the other sites. It was the only site which received an overall rating of least impact.

The Respondents and owners of the former Grammar School site confirmed their support for housing, including the provision of affordable housing and also proposed to include a Care Home which meets the local needs and provides local employment. In the pre-publication Draft of the Core Strategy which was considered by the full Council only days before the finalisation of the pre-submission Consultation, the Grammar School site was shown as an allocation on Map 14 and on Inset Map 6. It proposed 120 dwellings,

with a minimum of 50% affordable dwellings for local people. A contribution towards the provision of indoor sports hall or open space/recreation contributions, transport infrastructure contributions, new or improved community and education facilities, landscaping to improve the setting of the development, open space to mitigate the potential impacts on nearby heathland and the potential for an extra care facility for older people. The Plan proposed a further settlement extension of 80 dwellings to be allocated through the Site Allocations Plan.

That allocation in the Core Strategy Draft was derailed by last minute representations by a group of well meaning, non-elected people determined to take advantage of the Government's proposals for "free schools". They had, without consulting with the land owners, made a proposal to the Secretary of State, even though they had been informed that the former Grammar School building was (a) not available and (b) not suitable. At about midnight the Council considered the site allocation, representatives of Education Swanage told Council Members that they were in negotiation to purchase the former Grammar School, which was not true. Only one person was available to speak for the owners of the Grammar School, he was an architect of considerable experience who told the Council that the building was not suitable for conversion to a modern school. Nevertheless, this last minute challenge with no evidence base was allowed to derail what had otherwise been a sound proposal.

Education Swanage is a non-elected Body with an ideological aspiration to create a school free from Local Authority control. "Free" does not mean that parents/guardians of pupils would not have to pay. They are, in the main, going to be small schools of between 6 and 60 pupils and may be accommodated in premises such as shops, halls and even private houses. The Government has made an amendment to the Permitted Development Order so that that a change of use from shops and other uses will not, in some circumstances, require planning permission. The representations on behalf of Education Swanage suggest a "huge demand for a secondary school". That is not however, what "free schools" are all about. They are about the human scale approach.

Education Swanage have had no negotiation whatsoever with the land owner who has subsequently written to Education Swanage to indicate that under no circumstances would he now be prepared to negotiate with them. It seems grossly unjust that the Local Planning Authority did not, at the very least, defer this matter for further consideration, instead of amending the Draft as they have. It appears to have been a kneejerk reaction very late at night.

There is no evidence base for including the possibility of a "free school" in the policy for South East Purbeck. On the contrary, it seems to me that even the consideration of providing a new school would detract from the Education Authority's considered policy to change from the current three tier system to a two tier system in which the First Schools at Swanage are expanded to become Primary Schools and the Purbeck School at Wareham is expanded to become a Secondary School with a Sixth Form.

The Education Authority proposals have been the subject of many months consideration and consultation and have been recently confirmed. Unlike the proposals for a "free school", the Education Authority's proposals have a strong evidence base. Paragraph 7.5.10, which follows Policy SE: South East Purbeck, makes reference to Education Swanage as a "local campaign group" having "aspirations to provide a free school". The text goes on to say the former Grammar School is one potential site, requiring further negotiation with the land owner. It does not require "further" negotiation because there has been no negotiation. This campaign group have merely assumed they could acquire the site and have been told by the land owners that it is not available to them and the Purbeck District Council have also been told that there have been no discussions with Education Swanage.

I understand Education Swanage has now removed reference to the former Grammar School from their website.

The written statement goes on to talk about Dorset County Council currently considering how best to replace the recently closed James Day Care Home in Swanage, which it says may be redeveloped on the current site. That is, in my opinion, most unlikely because the site is only large enough to accommodate the Home

which currently exists, which is about a 30 bed Home. There have been discussions about re-opening the Home with a fewer number of bed spaces and more amenity facilities. Care Home operators are normally looking for a minimum 60 bed spaces, frequently more.

Looking at the evidence base, we see at paragraph 1.1.1 of Core Strategy Background Paper Volume 5: Housing Supply, there is a "critical need to deliver affordable housing in the District with 1,666 households currently on the waiting list (September 2010)". That is a need which exists now, not in 5 years time. At paragraph 1.1.2 it states that the 2006 Housing Needs Survey highlighted the District's "chronic need for affordable housing" of 409 affordable homes per annum. At paragraph 1.1.8 we see that since 2006 there has been an average completion of 50 affordable homes per annum, which is significantly less than the target recommended by the Housing Needs Survey of 409 per annum.

Paragraph 2.2 states that windfall housing accounted for 92% of housing delivery. That of course was before the Coalition Government condemned "garden grabbing". The potential supply from windfall sites will also be affected by Policy AH which seeks a 50% contribution of affordable housing on developments of two or more dwellings. In other words, for every two dwellings built, the Local Authority will expect one of those units to be an affordable dwelling. The property owner would be better off building a single dwelling than building two! The Local Authority can therefore expect that the rate of windfall development in Purbeck District will in fact decrease substantially.

Section 3 of the Background Paper talks about how the target dwelling supply of 2,400 dwellings was arrived at. This is related to household projection figures which showed a demand for 4,000 new homes in the District by 2026 and this has been tempered by environmental considerations. 2,400 dwellings equates to just 120 dwellings per annum, which is substantially below that which was being delivered in the past and is in fact only about 20% of the requirement for affordable housing alone. The section concludes by saying that the Council needs to allocate new housing sites to maintain a 5 year housing land supply and maintain control over the location and delivery of housing. It states that it is preferable that the Council provides a clear framework for the location of new development through a Plan-led approach that has been subject to Public Consultation and Examination in Public.

Consultation led to the identification of Site D (the former Grammar School site) at Swanage. It is pertinent to point out that this is a previously developed site (brownfield site) and remains within the definition in PPS3.

In Section 4 of the Background Paper it talks about testing housing growth scenarios and concludes that 2,400 dwellings proposed would be acceptable within the context of the Habitats and Regulations Assessment and the Purbeck Preliminary Transport Assessment.

Paragraph 4.5.1 sets out the approach to identifying locations for development in which nine options were assessed, with three options taken forward for Public Consultation, the Preferred Option being to distribute development around Swanage, Upton, Wareham and the Key Service Villages. Paragraph 4.6.1 confirms that the Preferred Option received 63% support from Public Consultation.

Paragraph 4.6.3 refers to Planning Inspectorate Guidance which said that changes to the Green Belt should be considered strategic and therefore, needed to be included in the Core Strategy. The settlement extensions proposed at Wareham, Upton and Lytchett Matravers would involve allocating land within the Green Belt, so the Council considered further where housing building should take place in Purbeck. Again, there was a Public Consultation relating to sites which had been identified through the Strategic Housing Land Availability Assessment process. In carrying out this Consultation, the District Council considered that it was "worthwhile" to gather responses on the other potential allocation sites, such as those at Swanage.

Paragraph 4.6.14 refers to the four sites which were put forward for Consultation with a view to delivering 200 dwellings. Paragraph 4.6.15 shows that Site D (the former Grammar School site) had clear support as it was selected by 85% of the responses. In my opinion, that is an unprecedented level of support. In my opinion, if the settlement extensions at Wareham and, in particular, Upton and Lytchett Matravers are to be



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The Core Strategy should revert to the Policy SE: South East Purbeck, set out in the Draft Core Strategy Pre-submission Document at page 52, in Map 14 on page 53, and Draft Inset Map 6.

# Wessex Water

**From:** Dave Ogborne[SMTP:DAVE.OGBORNE@WESSEXWATER.CO.UK]  
**Sent:** Monday, December 20, 2010 11:39:15 AM  
**To:** email-LDF  
**Cc:** Gillian Sanders  
**Subject:** Purbeck Infrastructure Plan and Core Strategy Submission Document  
**Auto forwarded by a Rule**

FAO -Steve Dring (Planning Policy Manager)

Many thanks for your notification of the proposed amendments to the Core Strategy document.

These revisions are noted, however it is unlikely that any previous comments submitted on behalf of Wessex Water require updating.

I look forward to participating in future consultations and if there are any matters that require my attention please contact me to discuss.

regards

**David Ogborne**  
**Planning Liaison Manager**  
Wessex Water  
Claverton Down Road  
Claverton Down  
Bath BA2 7WW  
Direct Dial 01225 526169

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This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please contact the Wessex Water Support Centre

email -> [support@wessexwater.co.uk](mailto:support@wessexwater.co.uk)

This footnote also confirms that this email message has been swept by

MIMEsweeper for the presence of computer viruses.

[www.mimesweeper.com](http://www.mimesweeper.com)  
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## Winterbottom J & J

**From:** John Winterbottom[SMTP:JVBOTTOM@TALKTALK.NET]

**Sent:** Sunday, November 07, 2010 1:47:30 PM

**To:** email-LDF

**Subject:** Purbeck planning

**Auto forwarded by a Rule**

Our views on the full development of the old Grammar School site have been tabled. Dorset, Purbeck, Swanage cannot afford the full development hoped for by the School Owners. The overall costs and traffic/movement consequences make the wider scheme unrealistic. The case for very late rescue of the old school is to be welcomed, but the costs again, make this very uncertain even if the case for a new school can be presented (we like and support the idea). We need a realistic and ambitious scheme to re-centre the medical centre. Geographically in terms of access to the ferry and Poole as well as Helicopter access all makes sense. The town would require a minibus link to make access a reality. We need affordable housing but this site is not really the ideal. In-filling and selected local sites could allow low cost/rental housing. May common sense prevail.  
John & Joy Winterbottom 46D' Urberville Drive, Swanage (residents for over 10 years)



# Wm Morrison Supermarkets Plc



**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		
Job Title (where relevant)		
Organisation (where relevant)	Wm Morrison Supermarkets Plc	Peacock and Smith
Address	C/O Agent	Suite 9C, Josephs Well, Hanover Walk, Leeds
Postcode		LS3 1AB
E-mail		Mark@peacockandsmith.co.uk
Tel. Number		0113 2431919

Responses should be sent to:

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

- 10<sup>th</sup> November, 7pm in the District Council offices, Wareham
- 18<sup>th</sup> November, 7pm, Community Hall, The Mowlem, Swanage
- 1<sup>st</sup> 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](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:

To allow for a robust examination of the issues raised.

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** Mark England for Peacock and Smith on behalf of Wm Morrison Supermarkets Plc

**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	Paragraph: 6.7.3.1 to 6.7.3.2	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 <b>process</b> 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 <b>content</b> 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"/>		
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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)

Wm Morrison Supermarkets Plc (Morrison's) notes that whilst Policy RFS seeks to allocate comparison floorspace to meet identified needs over the Plan period, no provision is made to address the requirement for convenience floorspace in the District.

As advised within PPS4, the Council has commissioned an assessment of the need for convenience floorspace in the District, which was completed by Nathaniel Lichfield & Partners (NLP) in September 2010. This indicates that:

1. there is a significant amount of convenience expenditure leakage from Sawanage and Wareham to food shopping locations outside the District, particularly in Poole.
2. there is substantial scope to increase the retention of convenience expenditure in the District.
3. a new foodstore would improve consumer choice and competition in the convenience retail sector in the District.



4. both Wareham and Swanage are vital and viable town centres.

5. the overlap in the offer of a new foodstore with that of Swanage and Wareham town centres could be minimised by planning restrictions, particularly in respect of the proportion of floorspace dedicated to the sale of comparison goods.

6. a new foodstore would not cause significant adverse impact on Swanage and Wareham town centres in the context of Policies EC10 and EC16 of PPS4.

Paragraphs 6.7.3.1 to 6.7.3.2 of the Core Strategy explain that the Council has decided not to propose a new foodstore in the Core Strategy, as it is concerned that an out of town site would have a negative impact on the character and setting of Wareham, and the potential to impact on the economy of the town centre cannot be ruled out.

Morrisons considers that this approach is unsound for the following reasons:

1. The proposed Vision for Purbeck seeks to ensure that Swanage, Wareham and Upton deliver good access to facilities to meet everyday needs. Spatial Objective 4 seeks to support local communities, and Spatial Objective 9 aims to ensure better accessibility to services for everyday needs. In this context, the current approach of the Core Strategy will not ensure that the District has good access to shopping facilities geared to the weekly bulk food shopping trip. It will perpetuate the high level of predominantly car-borne trips to main food shopping facilities outside the District.

2. PPS4 seeks to deliver more sustainable patterns of development, and provide for a distribution of shopping facilities to allow genuine choice to meet the needs of the whole community. Policy EC5 indicates that Local Planning Authorities should identify sites to meet the identified need, and an apparent lack of sites of the right size should not be a reason to avoid planning to meet the identified need for development. The current approach of the Core Strategy fails to provide for a choice of main food shopping facilities, and does not address the need for a large foodstore in the District that is identified by the NLP study. No evidence has been provided within the Core Strategy that a new foodstore would result in a significant adverse impact on the town centre of Wareham and Swanage. The approach of the Core Strategy will not deliver more sustainable patterns of development.

Having regard to the above, Morrisons considers that the Core Strategy should seek to facilitate the provision of a main foodstore in Wareham or Swanage, but restrictions should be imposed on the proportion of floorspace dedicated to the sale of comparison goods to limit the scope for competition with the non-food shopping function of the centres of these two towns. Morrisons would be well placed to deliver such a facility, as the Company is not currently represented in the District, and remains a predominantly grocery retailer that does not sell clothing or white goods.

If the Council is unable to identify a site suitable, available and viable for a new foodstore at the present time, then the Core Strategy should make a high level commitment to the delivery of a foodstore, and leave the location of this facility to be determined by the Site Allocations DPD, or a future planning application.

#### **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).

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'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 <b>process</b> 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 <b>content</b> 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:

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- 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:**

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

1. Legally compliant <i>i.e. comments on the <b>process</b> 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 <b>content</b> 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.



**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		Doug Cramond
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	Wyatt Homes	DC Planning Ltd
Address	c/o Agent	39 Twamlow Ave Poole
Postcode		BH14 8AL
E-mail		dcramond@depltd.co.uk
Tel. Number		01202 773080

Responses should be sent to:

**Email:** [ldf@purbeck-dc.gov.uk](mailto: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 20<sup>th</sup> 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:

- 10<sup>th</sup> November, 7pm in the District Council offices, Wareham
- 18<sup>th</sup> November, 7pm, Community Hall, The Mowlem, Swanage
- 1<sup>st</sup> 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](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:

The respondent has legal control over the whole allocation area and land beyond. It is essential that the Inspector hears from Wyatts on its development aspirations for, and commitment to, the site and the company will be able to assist directly on any technical or environmental questions as well as housing type, size and phasing queries. Preliminary planning work is in hand on this site and Wyatts will be able to update the Inspector on this front. The Wyatt project team through generations of local building and preferred use of local consultants has in depth knowledge of Upton and surrounds which may be of assistance to the hearing. It will be important that the session has a range of views present from those immediate neighbours who object to those who strongly believe that in the greater interest the settlement needs this modest and logical expansion

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 Doug Cramond

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 : Policy NE	Paragraph: 	Map: 11
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <b>process</b> 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 <b>content</b> 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 <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)

Support for Policy NE in respect of allocation for approx 70 dwellings at Policeman's Lane:

The 'scene setting' by the Core Strategy (CS) for the specific policy of interest to Wyatts is appropriate. The Spatial Objectives (para 4.3) come together to form a suitably aspiration and achievable vision. The General Location of Development Policy (Policy LD) carries this through in terms of a settlement hierarchy and it is entirely sound that Upton should be in the highest category, 'Towns'. The facts available as the evidence base bear this out. Places in the highest category need to be the first port of call for any housing provision of any significant scale to ensure local and wider sustainability and comply with national policy set out within, for example, PPS1, PPS3 & PPS7.

The affordable housing research related to the CS is thorough and compelling – the housing need in Purbeck generally and Upton in particular must be addressed through emerging policy. And this needs to be done urgently. The Council is right therefore to press on with this Core Strategy rather than delay the process further to assess major strategic growth proposals put forward by others. It is important that development on medium sized sites can proceed in as short a time frame as possible and not be held up by unrelated issues

such as the complexity of dealing with Habitat Regulations in respect of large sites at Lytchett Minster, Wool and West of Wareham. The CS rightly notes that at the other end of the scale the windfall rates are dropping, and will continue to do so and that affordable housing and community benefits are never fully provided by the smallest schemes.

The site at Upton plays a crucial role in the Housing Trajectory which must be deliverable and it is right that such necessary housing provision lies fully within the early (1-5 years) part of the Housing Supply (Policy HS).

Upton lies conveniently for Holton Heath Industrial Estate which is a key employment site in SE Dorset and in turn lies alongside Admiralty Park which for the first time is formally allocated in the CS for refurbishment and redevelopment. Clearly there are also local employment opportunities in Upton and the Plan touches on the adjoining settlement's focus to 2026 – with Poole aiming to create 15,435 new jobs to add to its existing very large supply. 'Looking across the boundary' to Poole also applies to important regional scale shopping facilities and primary facilities of other types including social and educational. Complementary to this, it is right that Upton has Local District Centre status in shopping terms (Policy RFS) with encouragement for any reasonable retail and service growth that may arise. Being the second largest town in Purbeck it almost goes without saying that there are primary school, doctors, library, community hall, sports and pub facilities. The Policeman's Lane site is well positioned to take advantage of these.

The land lies in the North East Purbeck part of the CS, in the only town in that sector: Lytchett Matravers being a key service village. Policy NE includes the allocation for approx 70 dwellings on this Policeman's Lane land. The 8 development requirements set out under this are reasonable, achievable and have stemmed from local input in setting out the aspirations for the town. The respondent is able and willing to deliver these either through the site and wider land holding or proportionate financial contribution. The highway works listed for both motor and other means of movement can be achieved and it is highly pertinent that the Highway Authority (Dorset County Council) fully support the allocation.

The approach set out of preparing a development brief is a good one and will enable yet more local participation in a process which has seen much local discussion over the site and clear Parish Council support for it. As the District Council states in the CS it is right that there are no hindrances to bringing the site forward, phasing would be inappropriate and 40% affordable housing should be deliverable subject to other planning obligation costs. Unlike great swathes of Purbeck heathland mitigation is not an issue of difficulty for this landholding.

The developer, Wyatt, has an established reputation for well designed good quality homes and it is an added advantage that local labour will be used on this site. The developer is committed to making rapid progress and delivering the much needed affordable (and reasonable cost level, market) homes. There are no other credible alternatives for growth around Upton which is virtually completely contained by harbour, heathland, major roads and administrative boundaries. The Council's evidence base is compelling on this matter.

The question of Green Belt has also been thoroughly examined. Because of the nature of the site, its immediate and wider context, the lack of local historic assets, and the A35 containment and the gap to Lytchett beyond this, there is no conflict whatsoever with the five purposes of including land in Green Belts set out in PPG2 (para 1.5). Change to openness and visual amenity, two further principal considerations of Green Belt, would not be materially harmed by this readily deliverable development which will sit most comfortably as a 'rounding off' scheme for Upton.

#### Map 11

It should also be noted that Wyatts support Map 11 in the CS which defines the development area. The map so graphically demonstrates that a) this is a rounding off b) there is clearly no conflict with the 5 purposes of Green Belt and c) that in terms of scale this is proportional, indeed very modest, in the context of Upton as a principal settlement in Purbeck. This, in all senses, is a sound allocation.

**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).

n/a



# WYG Planning & Design

WYG Planning & Design

part of the WYG group



Ref: A011389/SH/RR/rr  
Date: 20 December 2010

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

Dear Sir/Madam

## **PURBECK DISTRICT COUNCIL CORE STRATEGY PRE-SUBMISSION CONSULTATION**

Having reviewed the recently published Purbeck Core Strategy Pre-submission draft we are pleased to make the following representations.

### **Retail Floorspace Supply (Policy RFS)**

Policy RFS states that provision will only be made for 2,000 sq m of comparison floorspace across the plan period to 2026. This is contrary to the evidence base which concludes that there is also an additional need for at least 2,000 sq m of convenience floorspace in the plan period.

This policy is not consistent with national planning policy as set out in Planning Policy Statement 12: Local Spatial Planning (PPS12). PPS12 identifies that Core Strategies must be *'founded on a robust and credible evidence base'*. Paragraph 4.37 (PPS12) notes that Core Strategies have major effects in terms of their social, environmental and economic impacts and as such it is essential that they are based on thorough evidence. PPS12 states that research and fact finding should be undertaken to provide evidence that the choices made by the plan are backed up by the background facts.

It is important that retail land uses are allocated in the LDF on the same basis as other uses, such as employment and residential land uses. Policy EC.4 of PPS4 states that local planning authorities should proactively plan for a strong retail mix in order to ensure that the range and quality of the comparison and convenience retail offer meets the requirements of the local catchment area.

We would suggest that Policy RFS is amended so that it is in accordance with the evidence base and guidance as set out in PPS4.

Cont'd...



creative minds safe hands

Ropemaker Court, 12 Lower Park Row, Bristol, BS1 5BN

Tel: +44 (0)117 925 4393 Fax: +44 (0)117 925 4239 Email: [info@wyg.com](mailto:info@wyg.com) [www.wyg.com](http://www.wyg.com)

WYG Environment Planning Transport Ltd Registered in England Number: 3050297

Registered office: Ardale Court, Citley Road, Headingley, Leeds, LS6 2JJ

WYG 00001011

### **Retail Provision (Policy RP)**

It is noted that Policy RP states that 'development outside the defined town centres of Swanage, Wareham and the Local Centre of Upton that adversely affects their vitality or viability will not be permitted'.

This approach is contrary to guidance contained in PPS4, which notes that, where it is not possible to locate main town centre uses (including retail development) within an existing centre, the relevant tests as set out in PPS4 should be adhered to. Such tests include the requirement for a sequential assessment (Policy EC.15) and an impact assessment (Policy EC.16) and the requirements as set out in Policy EC.17. We would therefore suggest that Policy RP should be amended to reflect this key guidance as set out in PPS4.

### **Sustainable Design (Policy SD)**

Policy SD requires all commercial development of 1,000 sq m or above to achieve a BREEAM rating of 'Excellent'. We consider that this requirement would be prohibitive in terms of bringing new development forward. To ensure sustainable economic growth we would suggest that this threshold should be lowered to achieve a BREEAM rating of 'Very Good' for commercial development of 1,000 sq m or above.

We trust these representations are of assistance and look forward to receiving confirmation of your receipt and response in due course. In the meantime should you have any queries please do not hesitate to contact us.

Yours faithfully

Signature has been blanked out

**Rachel Robinson**  
**Senior Planner**  
For and on behalf of WYG Planning & Design



Ref: A011389/SH/RR/rr  
Date: 20 December 2010

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We would suggest that Policy RFS is amended so that it is in accordance with the evidence base and guidance as set out in PPS4.

Cont'd...



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Registered office: Arndale Court, Otley Road, Headingley, Leeds, LS6 2UJ

WYG 000008 01



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**Senior Planner**  
For and on behalf of WYG Planning & Design