

# Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010  
Consultation Responses  
Part 14**

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# Young A



**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	Andrew Young	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
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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

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
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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:

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

Signature
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Date 26/11/10
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**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy :	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:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>	<input checked="" type="checkbox"/>		
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>	<input checked="" type="checkbox"/>		
It is not 'consistent with national policy'	<input checked="" type="checkbox"/>		

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

**Comments:**

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

The whole strategy is based on predicted growth in an area which may be totally unjustified. Currently larger companies are moving away so the demand for housing should reduce rather than increase. Many homes currently are second homes and more buildings will just end up becoming more of the same. In addition some of this build is on green belt which seems to conflict with previous legal opinion (historically people couldn't build on it). Other areas throughout the country push back against ruining the area so I am at a loss to see why our councillors want to destroy such a beautiful part of the world.

**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).

All development into greenbelt should be removed from the plan. Building should only be encouraged where a real need (from additional jobs) can be demonstrated.

# ZBV (Winfrith Ltd)



**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		Jon Roshier
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	ZBV (Winfrith) Ltd	Rolfe Judd Planning
Address	C/O Agent	Old Church Court Claylands Road The Oval London
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Tel. Number		020 7556 1500

**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.

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- 10<sup>th</sup> November, 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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**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:

Our client is actively progressing the regeneration of the Dorset Green Technology Park (a substantial business park located close to Wool and East Burton) and has developed a Masterplan to drive forward new development at the site. Hence, our client is very keen to input into the future policy approach towards new development at the DGTP site and within the District as a whole.

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 Jon Roshier

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 :	Paragraph: 3.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

**Comments:**

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

We broadly agree with the Council's interpretation of the main challenges facing Purbeck within the plan period.

In our view, the Council should assess all future planning applications (particularly in relation to large scale regeneration projects) against the contribution new development will make to addressing each of these challenges.

Furthermore, we believe that the regeneration of the DGTP (as outlined in the proposed Masterplan for the site) provides the opportunity to respond to these challenges by:

- providing significant new employment opportunities (including new local employment opportunities) by providing/attracting new businesses and education facilities to the DGTP site;
- providing low cost/affordable housing specifically tailored towards meeting local needs/requirements as part of a comprehensive regeneration proposal;
- providing opportunities to protect and enhance the local environment (particularly the nearby protected



Heathland) via the introduction of a SANGS;

- relieving traffic congestion by focusing new development close to Wool main-line train station (with its links to Dorchester, Wareham, Poole, Southampton and London) and introducing new sustainable transport modes as part of a comprehensive development solution;
- providing new and enhanced community facilities (including shops) within the existing settlements (including Wool), alongside new community/social infrastructure designed to complement and strengthen existing communities.

**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 :	Paragraph: 4.2.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <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 checked="" type="checkbox"/>		

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

**Comments:**

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

We broadly support the 'Vision for Purbeck'. However, promoting sustainability and delivering sustainable development (and communities) should be at the heart of the future vision for Purbeck.

With this in mind, greater recognition should be given to the need to deliver new growth (via new development) throughout the Borough. In particular, the Council should commit to exploring opportunities to improve the function/role of the existing towns and key villages (particularly Wool - which is already well served by public transport and is in close proximity to existing employment opportunities). This should include policy support for the strengthening the range of services/facilities provided; encouraging economic development and providing new housing (where needed). This approach would be consistent with national policy objectives.

Recognition should also be given to the opportunity to achieve a more sustainable pattern of development – in particular, locating new housing next to existing business/employment locations (such as at the Dorset Green Technology Park), which will offer the opportunity to reduce inward commuting, and improve access to jobs, services, retail facilities and homes.

**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 view of our comments above, in our view the 'Vision for Purbeck' should be revised as follows:

Purbeck will be a place which retains and enhances the unique qualities of Swanage, Wareham, Upton, the villages, countryside and coast, whilst improving the quality of life for the whole community. The Council will plan for managed growth to meet future housing and employment needs and prioritise the location of new development in –line with the principles of sustainable development.

To achieve this Purbeck will provide a mix of housing types, sizes and tenures which are affordable and suitable in meeting local needs first and those of the wider housing market. Such new development will have high standards of sustainable design and will respond positively to Purbeck's rich diversity of local architectural traditions, thereby helping sustain the special character of the District and the distinctiveness of places within it.

Purbeck will have a wider access to well-paid and diverse local employment opportunities. The regeneration of the District's existing employment sites will be strongly supported. Agriculture, farm diversification, estate management and Purbeck stone quarrying will play a role in retaining small rural communities, the wider rural landscape and the function of the countryside.

Purbeck will continue to value its unique and internationally important habitats in the face of modern pressures, including the effects of climate change. At the same time, its excellent tourist facilities will serve its world-famous visitor sites and will continue to draw visitors to its coast, beaches, historic towns and villages.

While acknowledging and planning for the importance of the links between Purbeck and the Poole/Bournemouth conurbation, the need to travel will be reduced by increased selfcontainment and the concentration of employment, housing, shops, services, and community facilities. These will be accessible to communities through the provision of a wider range of transport methods and a shift in travel choices and patterns. Connectivity between settlements will have been enhanced through improvements to existing public footpaths, cycle ways, the District's road network, and a greater provision of public transport, including support for the reconnection of the Wareham to Swanage branch line to the national rail network.

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

1. Legally compliant <i>i.e. comments on the <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 type="checkbox"/>	No Comment <input checked="" type="checkbox"/>

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

*(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)

We broadly support the identified spatial objectives. However, as per our comments to the 'Vision for Purbeck', promoting sustainability and delivering sustainable development (and communities) should be at the heart of the future vision for Purbeck.

With this in mind, greater recognition should be given to the need to deliver new growth (via new development) throughout the Borough. In particular, the Council should commit to exploring opportunities to improve the function/role of the existing towns and key villages (particularly Wool - which is already well served by public transport and is in close proximity to existing employment opportunities). This should include policy support for the strengthening the range of services/facilities provided; encouraging economic development and providing new housing (where needed). This approach would be consistent with national policy objectives.

Recognition should also be given to the opportunity to achieve a more sustainable pattern of development – in particular, locating new housing next to existing business/employment locations (such as at the Dorset Green Technology Park), which will offer the opportunity to reduce inward commuting, and improve access

to jobs, services, retail facilities and homes.

**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).

On this basis, the Spatial Objectives should be amended to include the following new objective:

"10. To plan for managed growth to meet future housing and employment needs and prioritise the location of new development in-line with the principles of sustainable development".

We also recommend that Objective 8 be amended as follows:

"8. Promote and support a prosperous local economy and direct new business development towards the sub-regional employment locations."

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

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

1. Legally compliant <i>i.e. comments on the <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 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 we are aware that the Regional Spatial Strategies (RSSs) are likely to be abolished, it is noted that the proposed changes to the South West Regional Plan (published in July 2008) increased the housing target for Purbeck to 5,150. This figure included 2,750 dwellings at Area of Search 7B (near Lytchett Minster) and 2,400 dwellings within the remainder of the District. However, due to the potential for the scale of development proposed at Lytchett Minster to adversely impact upon the integrity of European Protected Sites, the Core Strategy was progressed on the basis of 2,400 dwellings only.

However, as per our previous representations to the Core Strategy, it continues to be our view that a higher level of housing growth (over and above 2,400 new homes) is not only achievable, but necessary within Purbeck. Achieving increased levels of housing growth will provide the opportunity to increase the supply of homes locally; assist in tackling affordability within the region (a key challenge for Purbeck); and support the planned employment growth.

The adoption of the proposed lower housing target (with limited growth and extension to the existing settlements) appears to only be a 'stop gap' and will not be sufficient to address the long-term challenges

facing Purbeck (namely - ensuring new housing is affordable - particularly to first time buyers and those who already live in the District; retaining workers/employees - particularly college leavers; addressing the ageing population; reducing the proportion of second homes).

We are also aware that the Government Office for the South West (GOSW) has queried the appropriateness of the 2,400 new homes target within Core Strategy. GOSW has indicated that some of the needs of the Poole/Bournemouth Housing Market Area should still be sought in Purbeck - and hence has advocated an increased housing target for the District.

On this basis, we strongly encourage the Council to consider/assess options for accommodating increased housing growth within the District (over and above the 2,400 target) to meet long-term housing need. In our view, the level of housing growth to be accommodated should closer reflect the original housing target set out in the July 2008 proposed changes to the RSS (i.e. 5,150 new homes). Furthermore, we would urge the Council (within the current Core Strategy) to consider options for locating this additional housing growth.

We also continue to be of the view that there is potential to accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) within Wool/East Burton. In many ways, Wool/East Burton is unique (within the District), in that it benefits from direct main-line train access to London and nearby towns/settlements; being directly adjacent to Dorset Green Technology Park (a strategic employment site with potential for significant employment growth over the next 20 years); extremely good road linkages to Dorchester and Wareham/Poole; the availability of potential development land (and developer interest); and the opportunity to accommodate new growth without detrimentally impacting upon the European Protected Sites.

**Proposed Changes:**

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We strongly encourage the Council to consider/assess options for accommodating increased housing growth within the District (over and above the 2,400 target) to meet long-term housing need. Furthermore, we would urge the Council (within the current Core Strategy) to consider options for locating this additional housing growth.

We also continue to be of the view that there is potential to accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) within Wool/East Burton.

**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 : LD: General Location of Development	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:

*(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)

We broadly support the Settlement Hierarchy outlined in Policy LD. However, given Wool's location, the good transport links (provided by Wool Station); the potential to accommodate significant new housing growth (as set out in our representations above); and the potential for an improved relationship with the DGTP site, it is our view that Wool should aspire to become a 'Town' – offering a variety of facilities/services, a range of housing choice (including affordable housing), new employment opportunities (at DGTP), improved accessibility (via public transport) and improved community infrastructure. Again, this should be recognised within emerging planning policy.

Furthermore, we believe that there is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. Indeed, as part of the Masterplan process (being undertaken by ZBV and the HCA in relation to the DGTP site) consideration is being given to options both for strengthening the links between the DGTP site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce.



The above is supported by the SWRDA – Workspace Strategy (Oct 2008) which identifies the DGTP site as having the potential to accommodate 20ha of employment/business growth and development and urges the Council to demonstrate “backing for support services” in terms of “facilities for the employees and Wool / Winfrith, these could include enhanced conference facilities, catering, hotel, gym and leisure”.

**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 our view, Wool should be identified as having potential to accommodate new housing and employment growth - and on this basis, be recognised as having the potential to grow to become a 'Town'.

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy :	Paragraph: 6.1.1 to 6.1.5	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 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)

We welcome the Council's recognition that there is a critical need to deliver more affordable housing within the District. We also agree that it will not be possible to provide the requisite number of new homes (both market and affordable) within the existing settlement boundaries.

However, we continue to have concerns over the Council's intention to adopt a target of just 2,400 new homes (up to 2026) within the Core Strategy. Not only is this target significantly below the housing target included within the RSS (for 5,150 new homes to be delivered), it is also below Government Household Projections (2009) for housing demand in Purbeck (identified at 4,000 new homes up to 2026).

Furthermore, we are also aware that the Government Office for the South West (GOSW) has queried the appropriateness of the 2,400 new homes target within Core Strategy. GOSW has indicated that some of the needs of the Poole/Bournemouth Housing Market Area should still be sought in Purbeck - and hence has advocated an increased housing target for the District (beyond the current Core Strategy target).

As noted above, it continues to be our view that a higher level of housing growth (over and above 2,400 new

homes) is not only achievable, but necessary within Purbeck. Achieving increased levels of housing growth will provide the opportunity to increase the supply of homes locally; assist in tackling affordability within the region (a key challenge for Purbeck); and support the planned employment growth.

The adoption of the proposed lower housing target (with limited growth and extension to the existing settlements) appears to only be a 'stop gap' and will not be sufficient to address the long-term challenges facing Purbeck (namely - ensuring new housing is affordable - particularly to first time buyers and those who already live in the District; retaining workers/employees - particularly college leavers; addressing the ageing population; reducing the proportion of second homes).

Furthermore, the Council's stated intention to increase the proportion of affordable housing and family homes by lowering of thresholds (on developments of 2 or more units) is likely to significantly impact upon the viability of small-scale infill development, thus reducing the likelihood of such schemes coming forward. Similarly, given the extremely limited availability of grant, the requirement to provide 90% of all affordable housing as 'social rented' accommodation is also likely to impact upon the viability and deliverability of new residential development within the District. This is likely to further reduce housing supply in the District.

On this basis, it is vital that the Council to consider/assess options for accommodating increased housing growth within the District (over and above the 2,400 target) to meet long-term housing need. In our view, the level of housing growth to be accommodated should closer reflect the original housing target set out in the July 2008 proposed changes to the RSS (i.e. 5,150 new homes). Similarly, in order to deliver greater affordability, it is also vital that the Council consider the designation/allocation of some large scale development sites which are capable of providing a viable range/mix of housing types and tenures.

Whilst we note that further work has been commissioned by the Council to investigate the options for accommodating a higher level of growth, in view of the pressing housing need within the District it is vital that the Council consider options for locating this additional housing growth within the current Core Strategy.

We also continue to be of the view that there is potential to accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) within Wool/East Burton. In many ways, Wool/East Burton is unique (within the District), in that it benefits from direct main-line train access to London and nearby towns/settlements; being directly adjacent to Dorset Green Technology Park (a strategic employment site with potential for significant employment growth over the next 20 years); extremely good road linkages to Dorchester and Wareham/Poole; the availability of potential development land (and developer interest); and the opportunity to accommodate new growth without detrimentally impacting upon the European Protected Sites.

#### **Proposed Changes:**

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

We strongly encourage the Council to consider/assess options for accommodating increased housing growth within the District (over and above the 2,400 target) to meet long-term housing need. Furthermore, we would urge the Council (within the current Core Strategy) to consider options for locating this additional housing growth.

We also continue to be of the view that there is potential to accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) within Wool/East Burton.



**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		Jon Roshier
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	ZBV (Winfrith) Ltd	Rolfe Judd Planning
Address	C/O Agent	Old Church Court Claylands Road The Oval London
Postcode		SW18 1NZ
E-mail		<a href="mailto:jonr@rolfe-judd.co.uk">jonr@rolfe-judd.co.uk</a>
Tel. Number		020 7556 1500

**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 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:

Our client is actively progressing the regeneration of the Dorset Green Technology Park (a substantial business park located close to Wool and East Burton) and has developed a Masterplan to drive forward new development at the site. Hence, our client is very keen to input into the future policy approach towards new development at the DGTP site and within the District as a whole.

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 Jon Roshier

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

1. Legally compliant <i>i.e. comments on the <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)

We welcome the Council's recognition that there is a critical need to deliver more affordable housing within the District. We also agree that it will not be possible to provide the requisite number of new homes (both market and affordable) within the existing settlement boundaries.

However, we continue to have concerns over the Council's intention to adopt a target of just 2,400 new homes (up to 2026) within Policy HS. Not only is this target significantly below the housing target included within the RSS (for 5,150 new homes to be delivered), it is also below Government Household Projections (2009) for housing demand in Purbeck (identified at 4,000 new homes up to 2026).

Furthermore, we are also aware that the Government Office for the South West (GOSW) has queried the appropriateness of the 2,400 new homes target within Core Strategy. GOSW has indicated that some of the needs of the Poole/Bournemouth Housing Market Area should still be sought in Purbeck - and hence has advocated an increased housing target for the District (beyond the current Core Strategy target).

As noted above, it continues to be our view that a higher level of housing growth (over and above 2,400 new

homes) is not only achievable, but necessary within Purbeck. Achieving increased levels of housing growth will provide the opportunity to increase the supply of homes locally; assist in tackling affordability within the region (a key challenge for Purbeck); and support the planned employment growth.

The adoption of the proposed lower housing target (with limited growth and extension to the existing settlements) appears to only be a 'stop gap' and will not be sufficient to address the long-term challenges facing Purbeck (namely - ensuring new housing is affordable - particularly to first time buyers and those who already live in the District; retaining workers/employees - particularly college leavers; addressing the ageing population; reducing the proportion of second homes).

Furthermore, the Council's stated intention to increase the proportion of affordable housing and family homes by lowering of thresholds (on developments of 2 or more units) is likely to significantly impact upon the viability of small-scale infill development, thus reducing the likelihood of such schemes coming forward. Similarly, given the extremely limited availability of grant, the requirement to provide 90% of all affordable housing as 'social rented' accommodation is also likely to impact upon the viability and deliverability of new residential development within the District. This is likely to further reduce housing supply in the District.

On this basis, it is vital that the Council to consider/assess options for accommodating increased housing growth within the District (over and above the 2,400 target) to meet long-term housing need. In our view, the level of housing growth to be accommodated should closer reflect the original housing target set out in the July 2008 proposed changes to the RSS (i.e. 5,150 new homes). Similarly, in order to deliver greater affordability, it is also vital that the Council consider the designation/allocation of some large scale development sites which are capable of providing a viable range/mix of housing types and tenures.

Whilst we note that further work has been commissioned by the Council to investigate the options for accommodating a higher level of growth, in view of the pressing housing need within the District it is vital that the Council consider options for locating this additional housing growth within the current Core Strategy.

We also continue to be of the view that there is potential to accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) within Wool/East Burton. In many ways, Wool/East Burton is unique (within the District), in that it benefits from direct main-line train access to London and nearby towns/settlements; being directly adjacent to Dorset Green Technology Park (a strategic employment site with potential for significant employment growth over the next 20 years); extremely good road linkages to Dorchester and Wareham/Poole; the availability of potential development land (and developer interest); and the opportunity to accommodate new growth without detrimentally impacting upon the European Protected Sites.

#### **Proposed Changes:**

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

We strongly encourage the Council to consider/assess options for accommodating increased housing growth within the District (over and above the 2,400 target) to meet long-term housing need. Furthermore, we would urge the Council (within the current Core Strategy) to consider options for locating this additional housing growth.

We also continue to be of the view that there is potential to accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) within Wool/East Burton.

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy :	Paragraph: 6.5.4 Dorset Green Technology Park	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 type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>	<input type="checkbox"/>		
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>	<input type="checkbox"/>		
• It is not 'consistent with national policy'	<input type="checkbox"/>		

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

**Comments:**

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

ZBV and the HCA strongly support the recognition within the Core Strategy of the potential to deliver 20 hectares of new employment land/development at the Dorset Green Technology Park (DGTP). This is consistent with the recommendations of the SWRDA Workspace Strategy (2008) which recognise that the site has capacity (and existing infrastructure) to accommodate significant levels of new business development (meeting an identified local demand, but also providing the opportunity to secure new inward investment into the region).

However, it is vital that the Core Strategy (and future Planning Policy) recognise that the site is now at an important transition point. Major new investment is now critically required to regenerate the site, to improve the quality of the on-site business accommodation, to re-brand the site as a low carbon (green) business location, to upgrade existing infrastructure, to encourage existing firms to remain at the site, and to attract new firms and businesses to locate at DGTP in the future.

As the Council will be aware, the majority of the existing buildings and infrastructure were originally constructed to serve the previous UKAEA use. Whilst a number of these buildings have been refurbished,



sub-divided into smaller units and re-let, the quality of the accommodation is generally poor and lacks modern services and amenities. As a result, the existing buildings are not well suited to catering for modern business requirements and it is becoming increasingly hard to let the accommodation despite the flexible terms offered.

For instance, rents achieved for business accommodation at the site are on average around £4-5 per sq.ft, which is well below the rents achieved for business accommodation in other parts of Dorset (i.e. approximately £11 per sq.ft) and is reflective of the quality of the existing stock on-site.

Furthermore, a number of the existing firms/businesses located at the DGTP site have a direct association/business connection with the nuclear industry and the former UKAEA use. As the UKAEA operation continues to downsize, there is less incentive/reason for these firms to continue to locate at the DGTP site. Additionally, it is anticipated that there will be increased competition from other sites within the UK as the Government pursues their programme of developing new nuclear power stations elsewhere in Country. As a result of the above factors, the site is now experiencing ever increasing levels of vacancy and approximately 8,000q.m (or 25%) of existing floorspace on-site is vacant.

It is also relevant to note that the current rental agreements with a number of existing tenants are due for renewal within the next couple of years. Whilst ZBV (and their managing agents) are hopeful that the majority will enter into new lease arrangements, it is expected that a range of incentives (including significantly reduced rents to c.£3-4 per sq.ft, rent free periods, reduced management/utility costs, reduced period between break clauses etc) will need to be included within any new terms agreed.

In addition, many firms on site are reducing the amount of floorspace occupied within their lease/rental agreements (primarily as a result of the current economic climate). This again is reducing the level of income being generated by occupied floorspace at the site - particularly when firms are able to negotiate more favourable rental terms for the occupation of a smaller floor area. As a result, the overall income generated by occupied floorspace is continuing to reduce year on year (and is expected to continue to decline if new floorspace/accommodation is not provided at the site).

ZBV (Winfrith) Ltd and the Homes & Communities Agency (HCA) are therefore committed to progressing the regeneration of the DGTP site - and the formulation of the DGTP Masterplan will be a key tool in ensuring that the site retains and strengthens its role as a strategic employment site. However, it is vital that future planning policy also provides strong support for new development and investment at the DGTP - without clear support there is a genuine risk that the park will stagnate and continue to decline. We therefore urge the Council to work closely with ZBV and the HCA to develop the Masterplan proposals for the site and integrate the Masterplan into future planning policy.

We note that reference is made in paragraph 6.5.4.4 to potential constraints to new development arising from the proximity of the protected heathland, flood risk and traffic congestion. However, we would advise the Council that assessment work is currently being completed to investigate the extent of any constraints to development at the DGTP site. This work will also identify suitable mitigation measures required to minimise any impact from new development. The findings of these assessments will be shared with the Council at an early stage.

We therefore urge the Council to continue to work with the Masterplanning Team to develop the proposals for the site. We would also encourage the Council to commence work on developing an Area Action Plan (for the Wool, East Burton and DGTP site) at the earliest opportunity to ensure that the wider regeneration benefits can be delivered.

**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 text should be amended to recognise the current commercial challenges associated with the site today (as outlined above) and the urgent need for regeneration. Furthermore, the text should also acknowledge that ZBV and the HCA are formulating a Masterplan for the regeneration of the DGTP site - and that the Council will be working closely with the Masterplanning team to develop those proposals.

**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: 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 <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 type="checkbox"/>	No Comment <input checked="" type="checkbox"/>

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

*(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)

We broadly support and agree with general approach of Policy ELS – in terms of directing new economic development towards the sub-regional employment sites.

As noted within the SWRDA Workspace Strategy (2009) – the DGTP site has capacity (and existing infrastructure) to accommodate significant levels of new business development (20ha). Indeed the SWRDA strategy recommends that the DGTP site should have 5 hectares of land made available to accommodate local employment growth/demand and a further 15 hectares for inward investment opportunities.

In our view, this provides a reasonable estimate of the scale of business development which may be achievable at the site – albeit, we believe that it may be possible to achieve a greater level of business development in the future (note: the future Masterplan will identify the potential scale of achievable development at the site).

We would also urge the Council to take on-board the other key recommendations included within the SWRDA report in relation to the DGTP site - which include:

- the Council should ensure that planning applications (promoting new development at the site) can be determined through the existing local plan and Core Strategy prior to the adoption of an AAP (for the area);
- once the Masterplan is available for the site the Council “will need to show a level of commitment, for an initial phase of employment development at least”;
- the Council should also demonstrate “backing for support services” in terms of “facilities for the employees and Wool / Winfrith, these could include enhanced conference facilities, catering, hotel, gym and leisure”;
- there is recognition of the HCA’s (and ZBV’s) aspiration to provide residential development in and around the DGTP site;
- that requiring significant contributions towards transport infrastructure may be prohibitive to bringing forward new development at the DGTP site – and may put the site at a disadvantage when being considered (by future tenants/occupants) against other potential business locations outside the District;
- support for future development (and the Masterplan) to be supported by an ‘open-book’ viability appraisal – in order to understand the costs associated with delivering new development;
- the benefits of promoting a ‘green’ or low carbon form of development – which could be key in attracting new businesses to the site.

As noted above, ZBV and the HCA are committed to securing the sustainable and viable regeneration of DGTP site to secure its position as the prestige employment site for high-tech firms within the Borough (and wider region).

In the short-term (the next 1-3 years), this will involve re-launching the site as the Dorset Green Technology Park (DGTP) and consolidating its role as a sub-regional ‘prestige’ business location via small-scale business development and improvements to the wider units/facility. This will also involve providing the infrastructure and branding the site as a ‘green/low carbon’ business accommodation.

In the medium to long-term (the next 20 years and beyond), the intention is to significantly improve the accommodation, services and facilities at the site through substantive new development – with the aspiration that the site becomes a regionally important employment centre (focused on high tech and specialist industries and business sectors). We are not aware of any alternative site (with investor support/backing) where a similar scale and quality of business development as per that envisaged at the DGTP site could be delivered.

As per our representations above, we would urge the Council to continue to work with the DGTP Masterplanning Team to develop the proposals for the sustainable (and long-term) regeneration of the site. We would also encourage the Council to commence work on developing an Area Action Plan (for the Wool, East Burton and DGTP site) at the earliest opportunity to ensure that the wider regeneration benefits can be delivered.

**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 per our comments above.

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy : RFS: Retail Floorspace 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 <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)

As noted above, it is our view that there is currently an under provision of key services and retail facilities within Wool (particularly given the size of settlement and proximity to the DGTP site). Furthermore, the existing facilities (particularly the retail offer) are dispersed and there is little to define the 'centre' of Wool. This is currently resulting in poor levels of self-containment with the majority of existing residents and workers (at the DGTP site) commuting outside Wool to make every-day purchases.

There is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. Furthermore, options both for strengthening the links between the DGTP site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce should also be explored.

**Proposed Changes:**

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

Policy should support the provision of new retail facilities at Wool in order to improve self-containment and to support existing and future residents/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 : SW: South West Purbeck	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <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)

As noted above, ZBV support the recognition within Policy SW of the potential to deliver 20 hectares of new employment land/development at the Dorset Green Technology Park (DGTP). This is consistent with the recommendations of the SWRDA Workspace Strategy (2008) which recognise that the site has capacity (and existing infrastructure) to accommodate significant levels of new business development (meeting an identified local demand, but also providing the opportunity to secure new inward investment into the region).

However, we would make the following comments in relation to Policy SW:

- it is vital that Policy SW recognises that the DGTP site is at an important transition point. Major new investment is now critically required to regenerate the site, to improve the quality of the on-site business accommodation, to re-brand the site as a low carbon (green) business location, to upgrade existing infrastructure, to encourage existing firms to remain at the site, and to attract new firms and businesses to locate at DGTP in the future;

- Policy SW should recognise that ZBV and the HCA are committed to progressing the regeneration of the DGTP site - and that the formulation of the DGTP Masterplan will be a key tool in ensuring that the site retains and strengthens its role as a strategic employment site;

- the proposals to regenerate DGTP will seek to both improve local employment opportunities (for those already living in the District) and attract new businesses (from elsewhere in the country) which will add to the diversity and vibrancy of the economy within Purbeck;

- as per our representations to Policy HS, we continue to have concerns over the Council's intention to adopt a target of just 2,400 new homes (up to 2026) for the District. It continues to be our view that a higher level of housing growth (over and above 2,400 new homes) is not only achievable, but necessary within Purbeck to tackle longer term challenges (such as affordability - particularly to first time buyers and those who already live in the District; retaining workers/employees - particularly college leavers; addressing the ageing population; reducing the proportion of second homes);

- based on this reduced housing target for Purbeck, it is noted that Policy SW advocates no planned housing growth within Wool during the plan period (over and above the existing Purbeck Gate development). Again, it is apparent that the failure to provide new housing within Wool will not be sufficient to re-address the affordability gap and provide local homes. Similarly, limited or no housing growth in Wool will fail to improve the self containment of the settlements (meaning existing residents will continue to travel outside Wool to access everyday services/facilities.

- furthermore, the current policy preference for 'no housing growth' in Wool will not support/service the regeneration of the DGTP site - and may put off potential firms from locating in the area (due to the lack of affordable homes locally);

- we continue to be of the view that there is potential to accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) within Wool/East Burton. In many ways, Wool/East Burton is unique (within the District), in that it benefits from direct main-line train access to London and nearby towns/settlements; being directly adjacent to DGTP (which has potential for significant employment growth over the next 20 years); extremely good road linkages to Dorchester and Wareham/Poole; the availability of potential development land (and developer interest); and the opportunity to accommodate new growth without detrimentally impacting upon the European Protected Sites.

It is therefore our view that Policy SW should not only support further employment growth at the DGTP site but should also support significant new housing growth within the Wool/East Burton/DGTP area - which has the potential to deliver the following benefits:

- new residential development will improve access for the existing and future business workforce (on the DGTP site) to new homes in the area;
- it will provide the opportunity to provide new affordable homes tailored towards meeting the needs of the local community and those working at the DGTP site;
- the provision of new residential development and other support uses/facilities (i.e. leisure, community and retail) will be a major attraction to businesses/firms looking to relocate their business function and workforce to DGTP from other parts of the UK;
- providing new homes in close proximity to the DGTP site will reduce inward commuting and will allow people the opportunity to leave near their place of work;
- focusing new growth in and around Wool/East Burton/DGTP will take full advantage of the main-line rail links and achieve a critical mass of development which will support wider improvements to the public transport network (and support the function of Wool as a transport hub);



- the provision of new housing within the Wool/East Burton/DGTP will reduce pressure on the Council to release other greenfield sites for housing within more sensitive parts of the District;
- the provision of new housing on 'non-sensitive' greenfield sites (around the DGTP site) will allow maximum development viability – which will enable the delivery of a mix of housing sizes, types and tenures;
- the provision of new housing will assist Purbeck in meeting long-term housing need;
- focusing new growth in the area will significantly increase the self sufficiency of Wool – with new housing development supporting retail, community facilities and the employment opportunities (at DGTP);
- new growth (particularly residential development) will reinforce the viability of existing shops and services within Wool – as well as supporting new provision (to serve the expanding residential and business communities);
- focusing new growth in the area provides the opportunity to take advantage of the new renewable energy facilities/infrastructure to be provided at the DGTP site. In particular, there will be the opportunity for new homes to be powered and heated via renewable energy technologies – thereby reducing climate change;
- new development will underpin and support the role/functioning of the DGTP site and significantly enhance the sustainability of the overall development.

**Proposed Changes:**

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

ZBV support the recognition within Policy SW of the potential to deliver 20 hectares of new employment land/development at the Dorset Green Technology Park (DGTP). However, (for the reasons above), it is firm view that Policy SW should also support significant new housing growth within Wool (including at the DGTP site).

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy :	Paragraph: 7.2.8	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <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:

*(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)

As noted within our earlier representations, ZBV and the HCA are committed to regenerating the business functioning of the DGTP site and have already implemented a comprehensive marketing strategy to promote the DGTP site as a 'prestige employment location'. As a first step, this has involved the re-branding of the site as the Dorset Green Technology Park – and the promotion of the site based on its 'green' vision. In addition, the Council has resolved to grant planning permission for 5,028sq.m of new business space/accommodation at the site (referred to as Phase 1a).

There is no doubt that the DGTP site presents a unique opportunity to deliver significant economic/employment development over the next 20 years for the local area and Purbeck as a whole. However, there is a clear risk that this opportunity will not be realised unless there is major new investment in significantly improving the DGTP site as a prestige business location. Indeed, given the continuing decline in rental income from the existing business accommodation, ZBV is concerned that without early investment in 2011/2012 the site may come commercially unsustainable.

The overarching objective for the DGTP Masterplan has therefore been to investigate options for bringing

forward the viable and sustainable regeneration of the DGTP site and to secure its future as a business location in the long-term. In tandem with this, ZBV and the HCA also aspire to create a highly sustainable and low carbon business location at DGTP.

To achieve this aspiration, investment is also required to provide the on-site renewable energy facilities (including the recently permitted Low Carbon Biomass Energy Facility), improving existing infrastructure/services, improving public transport accessibility, implementation of sustainable travel plan initiatives, use of sustainable construction methods and introduction of sustainable drainage measures etc.

The core objectives for the regeneration of the DGTP site are therefore:

- to promote the regeneration the existing DGTP campus and to deliver significant new 'business' development to enable the site to function as a 'prestige' business/employment location within the Borough and wider region;
- to promote the DGTP site as a 'green' or low carbon business location through investment in providing on-site renewable energy facilities, improving existing infrastructure/services, improving public transport accessibility, implementation of sustainable travel plan initiatives, use of sustainable construction methods and introduction of sustainable drainage measures etc.
- adopt a sustainable communities approach towards new development by delivering a mix of uses to improve access to jobs, homes, leisure, shops, community facilities and social infrastructure;
- progress a viable regeneration strategy where the mix of uses (particularly the new residential development) will can assist in cross-subsidising the wider regeneration of the business campus;
- develop a high quality urban design and architectural approach towards the redevelopment of the site – including the formulation of a design code and landscape strategy;
- improve connectivity and links with the neighbouring settlements thereby better integrating the WTC site (and future development) with the existing communities;
- take a phased approach towards the delivery of new development – to meet demand and to balance future development with the provision of improved housing, leisure, community and social facilities;
- promote a sustainable transport strategy which reduces reliance on the use of the car, promotes sustainable transport modes and improves access to public transport;
- ensure the development is well integrated and improves the environment – particularly the neighbouring Dorset Heathlands, the on-site ecology and wildlife habitats;
- improve existing infrastructure and services – including the implementation of infrastructure and drainage strategies (which will include SUDs) and the mitigation of any potential flood risk;
- incorporate measures targeted at reducing carbon emissions and tackling climate change – including the potential introduction of on-site energy generation (via renewable energy sources), sustainable construction techniques, promoting energy efficiency, encouraging sustainable travel patterns etc.

As noted by Policy SW, the SWRDA Workspace Strategy identifies the DGTP site as an important sub-regional employment site with the opportunity to deliver 20ha of new employment/business development. ZBV and the HCA believe that this represents a reasonable estimate of the land available to provide new business space in the long-term (i.e. next 20 years). However, in view of the constraints associated with the DGTP site (particularly the age/quality of the existing building stock and isolated location), the regeneration of the DGTP site must be based on the provision of new business floorspace – alongside the provision of a range of support facilities which will both service the future business community and encourage new firms

locate to the site.

The Masterplanning work completed on behalf of ZBV has identified the opportunity to provide new residential development as part of a comprehensive sustainable regeneration scheme at the DGTP site. The provision of new residential accommodation in tandem with the regeneration of the DGTP site will fulfil a number of objectives:

- it will improve access to housing (for the existing and future workforce);
- it will improve affordability – and provide the opportunity to deliver new affordable/low cost housing tailored towards meeting local housing needs/requirements;
- it will support existing local facilities and shops and provide the opportunity to provide new facilities/services to cater for the existing/future resident and working population;
- it will reduce inward commuting distances and provide the opportunity for people to live close to where they work;
- it will assist in attracting new firms into the DGTP site on the basis that there will be new homes available (close to the site) which can accommodate their workforce;
- it will improve the sustainability of new development within the area – by providing a mixed and integrated business and resident community.

In addition to the above, given the relatively low market rents generated by business space (both existing and new) in this location, the provision of new residential accommodation (and/or other higher value uses) will provide the opportunity to act as an enabling development and cross-subsidise the regeneration of the DGTP site, and more specifically the provision of any new business accommodation.

Agents (acting on behalf of ZBV and the HCA) have advised that it is unlikely that new tenants will be attracted to the DGTP site unless new business development/accommodation is provided. However, it is not viable (or realistic) to deliver any new floorspace on-site on a speculative basis without some form of enabling development or alternative funding arrangement. Accordingly, the Masterplan proposes the phased delivery of new business space at the site in conjunction with new residential development (and other uses) which would cross-subsidise the delivery/construction of new floorspace.

With the above in mind, the initial work on the Masterplan has identified the opportunity to achieve substantial new development at the site (and on land owned by ZBV and the HCA). An updated version of the Masterplan strategy is included within the Dorset Green Masterplan Vision and Proposal report (prepared by Rummey Design and as previously submitted to the Council) which identifies the opportunity to deliver:

- approximately 20ha of new employment development – including a mix of Class B1, B2 and B8 uses;
- new residential development – predominately on land to the south of the main access road (including new low cost and affordable housing);
- new sports/leisure facilities – including a gym, leisure centre, sports pitches;
- a renewable and low carbon energy facility – a planning application for the facility is currently under consideration by Dorset County Council;
- new hotel and conferencing facilities;
- new community facilities/services – potentially including a crèche, new educational and health uses;
- new retail and other complimentary services/uses;
- a new wildlife visitor centre and SANGs wetlands (located to the south of the main DGTP site).

Additionally, ZBV and the HCA have appointed the Bespoke Property Group (BPG) to formulate the strategy for the delivery of new housing in conjunction with the regeneration of the DGTP site. The draft Strategy is set out in BPG's report (entitled: The proposed Housing Strategy for Residential Development at Dorset Green Technology Park – again previously submitted to the Council) and considers:

- options for creating a sustainable community at the site;
- options for reducing the carbon footprint of those living and working on the development;

- options for delivering between 40-50% of new housing as affordable housing (including the provision of discounted market housing – for both purchase and rent);
- the provision of a mix of units to ensure a stable and growing community;
- the provision of a mix of tenures that allow for a range of life-style choices;

BPG are also assessing the feasibility of introducing a 'local lettings plan' initiative. The intention is that this initiative will apply to the affordable accommodation to be provided within the development and would prioritise the availability of new housing to those who are/will be working on the DGTP site, followed by those living and working in the neighbouring villages. This approach is very much in accordance with the overriding aspiration improve the sustainability of DGTP – and in particular reduce the level of outward commuting.

In view of the above, it is vital that the Council to continue to work with the DGTP Masterplanning Team to develop the proposals for the sustainable (and long-term) regeneration of the site. We would also encourage the Council to commence work on developing an Area Action Plan (for the Wool, East Burton and DGTP site) at the earliest opportunity to ensure that the wider regeneration benefits can be delivered.

**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 per our comments above.

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		Jon Roshier
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	ZBV (Winfrith) Ltd	Rolfe Judd Planning
Address	C/O Agent	Old Church Court Claylands Road The Oval London
Postcode		SW8 1NZ
E-mail		<a href="mailto:jonr@rolfe-judd.co.uk">jonr@rolfe-judd.co.uk</a>
Tel. Number		0207 556 1500

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 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:

Our client is actively progressing the regeneration of the Dorset Green Technology Park (a substantial business park located close to Wool and East Burton) and has developed a Masterplan to drive forward new development at the site. Hence, our client is very keen to input into the future policy approach towards new development at the DGTP site and within the District as a whole

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 Jon Roshier

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

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

It is vital that all future policy concerning the delivery of affordable housing within future development has regard to the need to encourage rather than restrain residential development. In particular, targets should be applied flexibly, taking into account individual site costs, the circumstances of the site (i.e. the presence of contamination and other constraints), overall scheme viability, the availability of public subsidy and other scheme requirements (including other potential infrastructure improvements and wider community benefits to be brought about by a development).

We would therefore urge the Council to utilise 'open book' viability assessments to establish the appropriate (and reasonable) level of affordable housing, tenure, and mix of units to be provided on individual sites.

We would also encourage the Council to consider and support other forms/tenures of housing. In particular, low cost (or discounted) market housing for sale and discounted market rent. These tenures currently fall outside the strict definition of affordable housing, but can help widen life-style choices and allow people (particularly first-time buyers) the opportunity to enter onto the property ladder. For instance, a person who has a small deposit but not enough to purchase in the open market could use the discounted sales product to



satisfy their needs. This would be in the knowledge that they could only re-sell the property with the discount still in place (note: the discount would still be stipulated by a charge on the property held with the freeholder/developer). Similarly, discounted market rented accommodation can also provide a valuable source of housing which can support those not currently able to afford to purchase their own property (note: discounted market rent properties can also be provided on a 'opportunity to purchase' basis).

Finally, given the high levels of holiday/second homes within the Borough, the Council may also consider giving support to new housing schemes which commit to making/marketing new residential accommodation to those living or working in the Borough in advance of making the properties available on the general market. Such an approach will prioritise housing for the local population.

**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 per our comments above.

**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:	
AH: Affordable Housing			
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"/>
<i>(For explanation of terms refer to guidance notes below)</i>			

**Comments:**

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

As noted above, it is vital that all future policy concerning the delivery of affordable housing within future development has regard to the need to encourage rather than restrain residential development. In particular, targets should be applied flexibly, taking into account individual site costs, the circumstances of the site (i.e. the presence of contamination), overall scheme viability, the availability of public subsidy and other scheme requirements (including other potential infrastructure improvements and wider community benefits to be brought about by a development).

We therefore support the Council's recognition of the benefit of completing 'open book' viability assessments to establish the appropriate (and reasonable) level of affordable housing and tenure mix to be provided on individual sites.

We would caution that the Council's stated intention to increase the proportion of affordable housing and family homes by lowering of thresholds (on developments of 2 or more units) is likely to significantly impact upon the viability of small-scale infill development, thus reducing the likelihood of such schemes coming forward. Similarly, given the extremely limited availability of grant, the requirement to provide 90%

of all affordable housing as 'social rented' accommodation is also likely to impact upon the viability and deliverability of new residential development within the District. This is likely to further reduce housing supply in the District.

Furthermore, (and again as per our comments above) we would also actively encourage the Council to support other potential sources of affordable housing – such as discounted or low cost housing. This can be particularly important source of new housing for first-time buyers.

Finally, given the high levels of holiday/second homes within the Borough, the Council may also consider giving support to new housing schemes which commit to making/marketing new residential accommodation to those living or working in the Borough in advance of making the properties available on the general market. Such an approach will prioritise housing for the local population.

**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 per our comments above.

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy :	Paragraph: 8.8.6.2	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

*(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)

We would draw the Council's attention to the opportunity to provide a SANGS to the south west of Wool in conjunction with the regeneration of the DGTP site.

Detailed proposals for the SANGS are currently being prepared by Rummey Design Associates and will be forwarded to the Council for comment. However, the SANGS is entirely located on land owned by ZBV and is therefore deliverable.

The provision of a SANGS to the south west of Wool will support the regeneration of the DGTP site and has the potential to provide for the recreation requirements associated with substantial new housing growth within Wool and at the DGTP 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).

**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: Dorset Heaths International Designation	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 type="checkbox"/>	No Comment <input checked="" type="checkbox"/>

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

*(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'  
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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)

We broadly support the approach outlined within the policy. In view of the location of the DGTP site close to the Dorset Heaths, the proposed Masterplan will include a comprehensive strategy for ensuring that new development respects and maintains the Dorset Heaths (including the provision of a SANGS to the south of the DGTP 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).

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

1. Legally compliant <i>i.e. comments on the <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:

*(tick all that apply)*

- It is not 'justified'  
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- 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)

As noted above, it is our view that there is currently an under provision of key services/facilities within the Wool (particularly given the size of settlement and proximity to the DGTP site). Furthermore, the existing facilities (particularly the retail offer) are dispersed and there is little to define the 'centre' of Wool.

There is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. Furthermore, options both for strengthening the links between the DGTP site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce should also be explored.

**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 per our comments above.

**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 : CF: Community Facilities and Services	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(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)

We broadly support the proposed policy approach towards the retention of community facilities and services. However, it is vital that when considering the need for new facilities (or retention of existing facilities) full consideration is given the potential for new development to come forward.

Furthermore, future policy should seek to promote greater self containment amongst the District's towns and villages. Hence, opportunities to improve and enhance community facilities and services within these settlements should be positively encouraged.

**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 per our comments above.



**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		Jon Roshier
Job Title <i>(where relevant)</i>		Director
Organisation <i>(where relevant)</i>	ZBV (Winfrith) Ltd	Rolfe Judd Planning
Address	C/O Agent	Old Church Court Claylands Road The Oval London
Postcode		SW8 1NZ
E-mail		<a href="mailto:jonr@rolfe-judd.co.uk">jonr@rolfe-judd.co.uk</a>
Tel. Number		0207 556 1500

**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
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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
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Our client is actively progressing the regeneration of the Dorset Green Technology Park (a substantial business park located close to Wool and East Burton) and has developed a Masterplan to drive forward new development at the site. Hence, our client is very keen to input into the future policy approach towards new development at the DGTP site and within the District as a whole

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 Jon Roshier

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 : GI: Green Infrastructure, Recreation and Sports Facilities	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 <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)

We broadly support the Council's proposed approach towards the retention and enhancement of Green Infrastructure, recreation and sports facilities.

However, whilst we recognise the preference to safeguard existing facilities, Policy GI should also acknowledge the opportunity to provide replacement facilities through new development (where new development involves the loss/replacement of an existing facility).

**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 recommend that the 3rd paragraph of Policy GI be amended as follows:

All designated open space, sport and recreation areas will be protected. Any loss of these uses will only be permitted where there is a proven excess of such provision and the proposed loss will not result in a current or future short-fall in the plan period; or where suitable alternative provision can be made to off-set any facilities lost.

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

1. Legally compliant <i>i.e. comments on the <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 type="checkbox"/>	No Comment <input checked="" type="checkbox"/>

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

*(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)*
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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)

We support the Council's approach towards achieving high quality sustainable design within new development. We are also pleased to note that Policy SD places significant weight on this important issue.

As noted above, the Masterplan for the DGTP site aspires to deliver a truly sustainable development incorporating:

- the production and use of energy and heat from renewable energy sources (including from the recently permitted Low Carbon (Biomass) Energy Facility);
- the potential to install a district heat loop to service current and future development at the site;
- the use of sustainable building materials for new development and inclusion of a high level of insulation;
- the use of passive ventilation on new commercial/business development (such as wind cowls) to reduce the need for air conditioning;
- the implementation of a site wide Travel Plan targeted at reducing car dependency;
- the provision of new public transport modes on-site (potentially including an electric bus service) which will link into the existing transport network and Wool Station;

- the provision (within future development) of a mix of uses to cater for the existing/future workforce and existing/future residents, thereby improving the self-containment of the DGTP site and Wool.

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

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

**Comments:**

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

We welcome the Council's policy support for the generation of energy (particularly renewable energy) - as set out in Policy REN.

As the Council will be aware, Dorset County Council has resolved to grant planning permission (DCC ref: 6/2010/0172) for a renewable and low carbon energy facility at the DGTP site. The facility will utilise advanced thermal conversion pyrolysis technology to thermally degrade a solid recovered fuel (including both municipal waste and biomass), to produce a combustible gas. Energy recovery would occur through the combustion of the gas in a gas engine capable of delivering combined heat and power to local users, in particular new development at DGTP site. ZBV is currently working closely with the New Earth Energy (NEE) to bring this important project forward.

However, it is important that the Council is flexible in its approach towards new renewable energy projects within the District. In particular, when considering new biomass/waste to energy facilities, it is vital that the Council recognise that it is often not possible to secure/guarantee a fuel supply chain prior to the granting of planning permission (note: potential fuel suppliers will often be reluctant to enter into a contract prior to the

grant of planning permission and/or certainty of project delivery). Accordingly, we urge the Council not to seek to impose onerous restrictions upon the receipt/proximity of fuel. The imposition of such restrictions may prevent these important projects from coming forward.

Finally, it is also our client's view that there may be the opportunity to deliver other renewable energy projects at the DGTP site (in tandem with the wider regeneration objectives). Initial feasibility and assessment work has indicated the potential to provide new solar energy and/or wind energy facilities. We would urge the Council to support such projects at the site - which could offer the opportunity for the DGTP site to become a leading location for renewable energy technologies and firms.

**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 recommend that future planning policy recognise the opportunity to deliver new renewable energy projects at the DGTP site.

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy : E: Employment	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:

*(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)*
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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)

Whilst we acknowledge the policy approach towards new employment development outlined within Policy E is intended as a 'catch-all', we are not convinced that it is appropriate in terms of promoting the regeneration and new development at the DGTP site. In particular:

- Policy E should also support and direct new employment provision for B class uses to the strategic employment sites (including DGTP) alongside Swanage, Upton and Wareham;
- in line with PPS4, Policy E should also support employment growth across all sectors - including retail, leisure, tourism etc – rather than just the more traditional Class B uses/sectors;
- whilst we recognise the Council's intention to safeguard/protect viable employment land. Policy should also recognise that there may be clear benefits in bringing forward non Class B development – either on or close to existing employment land. For instance, where existing employment land is either redundant/under-used, the inclusion of non B Class uses may support (or potentially fund) wider regeneration projects. Future policy should therefore be sufficiently flexible to enable such schemes to come forward.



As noted within our earlier representations, ZBV and the HCA are committed to delivering the sustainable (and viable) regeneration of the DGTP site, which will ensure its future as a business location in the long-term.

Initially (i.e. through the next 1-3 years), this will involve re-launching the site as the Dorset Green Technology Park (DGTP) and consolidating its role as a sub-regional 'prestige' business location via small-scale business development and improvements to the wider units/facility. In the medium to long-term (the next 20 years and beyond), the intention is to significantly improve the accommodation, services and facilities at the site through substantive new development – with the aspiration that the site becomes a regionally important employment centre (focused on high tech and specialist industries and business sectors).

Furthermore, a key aspiration for both ZBV and the HCA is to adopt a 'sustainable communities' approach (based on a mixed-use development – incorporating residential), to achieve new development which not only meets the needs of the future business community but also builds on and improves linkages with the wider area (particularly Wool) – offering a genuinely inclusive and sustainable development solution. As noted above, to drive forward the regeneration of the DGTP site ZBV and the HCA have been developing a Masterplan to identify and guide new development at the site.

The core vision for the DGTP Masterplan is based on promoting the regeneration of the site by securing new investment and delivering of significant new business development (ensuring the status of the site as a 'sub-regional' - and eventually regional – employment location). This will be achieved through the provision of a mix of uses which will provide support facilities (to serve the existing business and residential communities) and deliver a more sustainable development solution and pattern of growth, but will also (in part) help subsidise the new business development at the DGTP site.

In our view, the adoption of a mixed-use approach (as advocated by the draft Masterplan) will offer the opportunity to respond (and overcome) a number of the current deficiencies within the South Purbeck Spatial Area, particularly in terms of:

- improving access to new jobs and stimulating economic activity within the region;
- improving the range of services/facilities available for use by existing/future residents and the DGTP workforce;
- providing the opportunity to deliver local employment opportunities for those already living within the District;
- providing the opportunity to deliver new affordable housing tailored towards meeting local needs and demands (with a focus on providing low cost/discounted housing for purchase and rent);
- strengthening linkages between DGTP and Wool, and out to the surrounding area;
- improving access to sustainable transport choices;
- improving the self containment of DGTP and Wool to reduce outward/inward commuting;
- providing new social and community infrastructure (i.e. education and health services) to service both existing/future residents and the DGTP workforce.

Overall, the proposed Masterplan has the potential to deliver 140,000 – 150,000sq.m of prestige business/industrial/storage accommodation (within the renamed Dorset Green Technology Centre), business support facilities (including retail, hotel, leisure facilities), between 500-700 residential units, community uses, new infrastructure, improved transport connections, significant environmental improvements. Furthermore, all new development will be designed to achieve sustainability objectives – including use of on-site renewable energy generation, energy efficiency measures, sustainable transport modes and waste mitigation proposals.

### **Proposed Changes:**

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

Policy should be amended as follows:

- Policy E should also support and direct new employment provision for B class uses to the strategic employment sites (including DGTP) alongside Swanage, Upton and Wareham;
- in line with PPS4, Policy E should also support employment growth across all sectors - including retail, leisure, tourism etc – rather than just the more traditional Class B uses/sectors;
- Policy E should also recognise that there may be clear benefits in bringing forward non Class B development – either on or close to existing employment land. For instance, where existing employment land is either redundant/under-used, the inclusion of non B Class uses may support (or potentially fund) wider regeneration projects. Future policy should therefore be sufficiently flexible to enable such schemes to come forward.

**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 : TA: Tourist Accommodation and Attractions	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 <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)

Recognition should also be given to the benefits of locating new hotel development close to or within existing business/employment areas – where such a facility can operate as a support facility and cater for the business tourism market.

There is considered to be the opportunity to locate a new hotel at DGTP - in conjunction with the wider regeneration of the site. A new hotel would support the business functioning of the site and provide new accommodation to cater for those visiting/working with existing/future firms located at the site.

**Proposed Changes:**

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As per our comments above.

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

Policy : IAT: Improving Accessibility and Transport	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"/>

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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)

We broadly support the objectives of Policy IAT. As noted above, a core objective of the Masterplan for the DGTP site is to develop a comprehensive sustainable transport strategy which will reduce reliance on the use of the private car, promote sustainable transport modes and improves access to public transport – all of which has the potential to reduce congestion on the A352 (and car borne commuting).

It is also recommended that the policy encourage other sustainable transport modes – such as the use of car clubs – which can reduce car ownership levels.

**Proposed Changes:**

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As per our comments above.



**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	Jon Roshier
Job Title <i>(where relevant)</i>	Director
Organisation <i>(where relevant)</i>	ZBV (Winfrith) Ltd
Address	Rolfe Judd Planning Old Church Court Claylands Road The Oval London
Postcode	SW8 1NZ
E-mail	<a href="mailto:jonr@rolfe-judd.co.uk">jonr@rolfe-judd.co.uk</a>
Tel. Number	0207 556 1500

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

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

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Our client is actively progressing the regeneration of the Dorset Green Technology Park (a substantial business park located close to Wool and East Burton) and has developed a Masterplan to drive forward new development at the site. Hence, our client is very keen to input into the future policy approach towards new development at the DGTP site and within the District as a whole

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 Jon Roshier

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 : ATS: Implementing an Appropriate Transport Strategy	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the <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)

It is vital that all future policy concerning the making of financial contributions towards the implementation of the Purbeck Transportation Strategy have regard to the need to encourage rather than restrain new development development. In particular, overall levels of contributions should take into account the net additional trips generated by development, support the introduction of a 'traffic credit' system (to take into account under used or vacant space).

Furthermore, as noted within the SWRDA Strategy (2009) there may be situations where requiring contributions towards transport infrastructure (under the Purbeck Transportation Strategy) may be prohibitive to bringing forward new development (such as at the DGTP site). In particular, high costs are likely to put certain sites at a disadvantage when being considered (by future tenants/occupants) against other potential business locations outside the District.

**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 per our comments above.



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

1. Legally compliant <i>i.e. comments on the <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 type="checkbox"/>	No Comment <input checked="" type="checkbox"/>

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

*(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)

It is vital that all future policy concerning the making of financial contributions to provide associated infrastructure (as set out in Policy DEV) have regard to the need to encourage rather than restrain new development development.

We therefore welcome the Council's commitment to assess the level of contributions (to be paid) on a site-by-site basis and via an open book viability assessment. This approach will ensure that the maximum level of contribution can be made - whilst ensuring that new development remains viable (and therefore deliverable).

**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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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 : FR: Flood Risk	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"/>

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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)

Whilst we recognise the importance of ensuring new development proposals reduce the overall and local risk of flooding, it is vital that future policy recognises that there may be significant benefits associated with bringing forward new development in areas that currently experience flooding.

In particular, we would urge the Council to utilise the 'Exceptions Test' (in accordance with PPS25) - which recognises that there may be situations where development is necessary within areas which experience a greater probability of flooding – for instance, where some continuing development is necessary for wider sustainable development/regeneration objectives to be met. In such cases, the proposed development must meet the Exception Test.

For the Exception Test to be met:

1. it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.

2. the development should be on developable previously developed land, such as sites appropriate for housing in accordance with PPS3 e.g. sustainable brownfield sites.

3. a Flood Risk Assessment must demonstrate that the development will be safe without increasing flood risk elsewhere, and where possible reduce flood risk overall.

Future policy should therefore recognise the opportunity to apply the 'Exceptions Test' (as set out in PPS25) to bring forward necessary/important development within the District.

**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 per our comments above.

3680  
16/12/10

11 Dolphin Court  
Northbrook Road  
Swanage  
Dorset  
BH19 1QJ  
December 14, 2010

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

Purbeck District Council Community Planning & Policy
16 DEC 2010
ACKNOWLEDGEMENT A B C D E
FILE REF:

Dear Steve Dring

Please find enclosed some of my comments regarding Purbeck District Council's Core Strategy.

Unfortunately, yesterday I sent your organisation a number of forms - six or seven - for which I had not provided a signature.

Please, use the signatures that I am now providing to validate those previously-sent forms and comments.

I spoke with Margaret Cheetham, who I always find very helpful and professional, and she said it would be possible for this to be done.

I have also asked that I receive a telephone call or calls - on 07866 706883 - as soon as your organisation receives my forms through the post. Hopefully, you will receive this package and the one I sent yesterday by Friday, December 17 at the latest. Otherwise, I shall have to re-write the forms and hand-deliver them to your offices over the weekend so that I do not miss the December 20 deadline.

Thank you for all your help.

Sincerely yours

Signature has been blanked out

Saran Zyga



**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  
18 DEC 2010  
FILE REF:

Your Details	Agents Details (where relevant)
Title	MS
Name	SARAH ZYGA
Job Title (where relevant)	
Organisation (where relevant)	
Address	11 DOLPHIN COURT NORTHBROOK RD, SWANAGE
Postcode	BH19 1QJ
E-mail	snegdeg3@hotmail.co.uk
Tel. Number	07866 706883

**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 checked="" type="checkbox"/> Yes, I wish to participate at the oral examination
---	--

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary in the space below:

*To further my "argument"*

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

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

Date <i>14.12.2010</i>
------------------------

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

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

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

1. Legally compliant <i>(i.e. comments on the <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)

Section 5 of the Habitat Regulations Assessment shows the devastating effect housing development will have on internationally recognised heathland sites and the protected habitats of endangered species such as the Dartford warbler, nightjar and rare sand lizards and smooth snakes and rare flora.

Using the figures in the report - sections 5.30; 5.31,5.32 - shows that building 900 new homes in Swanage would result in, at the very least, an extra 149,400 visits to outdoor space each year and an extra 34,362 visits to heathland.

Much of Swanage, particularly north Swanage, is within less than 5 minutes drive of heathland. The report points out that the heath at Studland, a European site just north of Swanage, would see the largest increase in visitor numbers.

The report states: " It is clear that, in the absence of mitigation, there will be an adverse effect on the integrity of the relevant Dorset heathland sites as a result of increased development. " - section 5.40.

However, mitigation measures for the Swanage/Studland area are not achievable. One such measure, controlling parking along Ferry Road ( between Studland ferry and Studland village ) would be, the report admits, difficult if not impossible to implement - 5.44; 5.45; 5.46. " Such locations are likely to be popular with Swanage residents, " the report states.

Another measure, providing alternative sites to deter people away from heaths ( Suitable Alternative Natural Greenspace - SANGs ) is " as yet largely untested. "

However, providing such a SANG between Swanage and Studland, the report points out, would be vital.

Yet Purbeck District Council's Core Strategy has not identified any such site for this vital SANG.

" the timely delivery of these alternative greenspaces cannot be relied upon at this stage with the level of certainty required to enable the Council to determine that they would avoid the likelihood of a significant effect on the heathland sites. " - 5.62.

Purbeck District Council's proposals take no account of the devastation that will result to our internationally renowned flora and fauna. Purbeck District Council treats our assets - which are the envy of the world - as if they were worthless.

**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 size of Swanage must not be increased through any settlement extension or the provision of 900 homes and its AONB must be fully protected.



**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>Particularity SE South East Purbeck</i>	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

 Yes 
 No 
 No Comment

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

 Yes 
 No 
 No Comment

(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)

*Please see attached  
4 pages.  
Please, do not change  
any of my comments/words.  
Thank you.*

**Comments on ' Planning Purbeck's Future ' Core Strategy  
( Particularly regarding Policy South East Purbeck**

**Flawed and Biased ' Public Consultation '**

The so-called 'public consultation' carried out by Purbeck District Council was not representational or scientific, nor was it widely publicised. Therefore, its results were inaccurate and biased and did not reflect the true views of Swanage people in totality.

\* A large number of Swanage residents did not receive ' consultation ' forms/questionnaire leaflets through their letterboxes and so did not comment on the proposals. They did not even know the 'consultation' was taking place.

\* Individuals or representatives of organisations could pick up bundles of the questionnaires at local libraries and Council offices. They could complete them anonymously, without providing their own names or addresses, and thereby greatly influence the result.

\* The respondents were self-selected - they themselves decided whether they wanted to or had the time and opportunity to complete and post the questionnaire and so take part in the 'consultation.' Furthermore, in order to complete the questionnaire they had to be able to read it and understand it.

Independent representational and scientific 'market' research should have been commissioned to ensure the results accurately reflected the views of Swanage people.

**Misinterpretation of and Misinformation about ' Public Consultation ' Questionnaire Responses**

The results of the 'public consultation' questionnaire responses have been totally misinterpreted by Purbeck District Council officers.

The officer's report to Councillors at the Special Council meetings on October 5 and 12, 2010 - at which the final version of the Core Strategy was decided - wrongly stated: " Site D ( the former grammar school site ) has clear support as it is selected by 85% of responses..... This shows clear individual support for site D....."

In fact, in just 52 of the total 1002 questionnaires returned within the consultation period was the former grammar school site solely chosen.

In all other cases when the site was selected, it was chosen merely as part of a combination of the four sites up for consideration - sites ABC and D, which are in different parts of the town.

This means that only 52 people - just 5.85 % of the responses - wanted the housing development to take place only on the former grammar school site.

By the same method, officers wrongly stated site B, Herston, had the support of 62% of the responses.

In fact, more than 90 % of the respondents wanted any housing development to take place on a combination of the proposed sites.

Also, the overall response of 1002 questionnaires meant just 10% of the questionnaires claimed to have been distributed were completed and returned. In other words, less than 10% of Swanage's population took part.

#### **Misinformation about Views of Societies**

Furthermore, the views and comments of the various organisations and societies that were consulted by Purbeck District Council were not accurately reported in the officer's report to Councillors. Some negative comments were even omitted. Many of the bodies also wanted any housing development to take place on a number of sites and not just one.

The officer's report stated: " Swanage Town Council, The Purbeck Society and Dorset AONB support development of site D " ( the former grammar school site ).

However, in fact -

The Purbeck Society did not, as the report stated, support building on the former grammar school site. It merely thought the site was the least bad option.

Dorset AONB Partnership said major development should not take place in an AONB except in exceptional circumstances.

And Swanage Town Council said any development should be spread over a number of smaller sites.

Meanwhile, for example:

Dorset Wildlife Trust is opposed to developing the former grammar school site.

Corfe Castle Parish Council is opposed to any more houses in Swanage

Isle of Purbeck Liberal Democrats want any housing to be spread over a number of sites.

Natural England pointed out that all the proposed sites are within the AONB.

#### **Poor and Inadequate Communications, Publicity and Information**

The representation form that members of the public have to complete to give their comments on the Pre-Submission version of the Core Strategy should have been simple to fill in rather than being confusing and obstructive. Special public meetings held especially to guide the public on how to complete the forms should have been totally unnecessary.

Indeed, only about 20 members of the public attended what Purbeck District Council described as the " briefing on how to complete these forms " held in Swanage on the cold evening of November 18, 2010. With such a title, it was hardly surprising that so few people bothered to turn up. Furthermore,

because the event was not publicised/ given adequate publicity few people actually even knew the event was taking place or thought it was worth turning up for.

Yet at this meeting, local residents learned for the first time that these forms presented the first and main opportunity to complain about the amount of housing being proposed for Swanage.

It was not until this 'briefing' that a Purbeck District Council officer explained that the representation forms could be used to object - for the very first time - to the amount of development, the 200 dwellings on the edge of Swanage.

As a result, local people mistakenly thought there was absolutely no point in turning up to a 'briefing' meeting that purely dealt with 'form filling.'

Swanage residents were not told that Purbeck District Council had agreed to the provision of 200 homes through settlement extensions. So they were not aware that they should be filling in complicated and confusing forms in order to object to this major decision made by Purbeck District Council.

Furthermore, the forms had to be returned by December 20, 2010. At this time of year Royal Mail is overloaded with post, some of which might not be delivered on time, and people are normally distracted by Christmas being just five days away.

#### **Crucial Information Not Provided**

Most people are totally unaware that Purbeck District Council has agreed to settlement extension/s of 200 dwellings on the outskirts of Swanage.

Purbeck District Council's press releases issued after the Special Council meetings in October 2010, held to finalise the Core Strategy, certainly did not make this clear. Indeed, crucial public information was not provided.

The press release issued to the local media after the first meeting on October 5 merely stated: " At the meeting, Councillors chose not to allocate the former grammar school site in Swanage, to allow further investigation into the potential of re-using the premises for a free school under new government education proposals. "

That issued after the October 12 meeting said: " Sites for additional homes will be found through further public consultation in Swanage ( 200 homes with 100 affordable ).....

And Purbeck District Council's own publication " About Purbeck " - which is totally paid for by local Council Tax payers and residents - only devoted less than half a page of its 16-page November issue to the Core Strategy. The only reference to Swanage in this article is in the last paragraph which states: " Sites for housing in Swanage, Bere Regis and Bovington will be up for further public consultation in 2011. "

Thus, Swanage residents read that the various and alternative sites on which

development could take place were to be considered at a later date, as part of the Site Allocations Plan in 2011. They assumed that at that time the number of homes to be built would also be decided upon. They were led to believe that the number of homes and the sites would not be part of this final Core Strategy document.

**Inaccessible Core Strategy Document**

The Core Strategy document was incomplete when it was put out for public consultation. Also, in order to understand it, numerous other documents needed to be read.

The document was not readily accessible - it was only available to view at libraries, Council offices and on the internet. If a person wanted their own copy, it cost £12 to buy. No précis was available.

Furthermore, it was exceptionally difficult to print off from the site. Frequently, the words "file damaged" would appear when the writer of these notes tried to access it.

Swanage has a large percentage of elderly people who do not own or use computers. Many, also, are unable to get to the library or Council offices.

3680  
15/12/10



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

	Your Details	Agents Details (where relevant)
Title	MS	
Name	SARAH ZYGA	
Job Title (where relevant)		
Organisation (where relevant)		
Address	11 DOLPHIN COURT NORTHBROOK RD, SWANAGE	
Postcode	BH19 1QJ	
E-mail		
Tel. Number	07866 706883	

**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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## Comments on ' Planning Purbeck's Future ' Core Strategy

### **Flawed and Biased ' Public Consultation '**

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in fact, more than 90 % of the respondents wanted any housing development to take place on a combination of the proposed sites.

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However, in fact -

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The press release issued to the local media after the first meeting on October 5 merely stated: " At the meeting, Councillors chose not to allocate the former grammar school site in Swanage, to allow further investigation into the potential of re-using the premises for a free school under new government education proposals. "

That issued after the October 12 meeting said: " Sites for additional homes will be found through further public consultation in Swanage ( 200 homes with 100 affordable )....."

And Purbeck District Council's own publication " About Purbeck " - which is totally paid for by local Council Tax payers and residents - only devoted less than half a page of its 16-page November issue to the Core Strategy. The only reference to Swanage in this article is in the last paragraph which states: " Sites for housing in Swanage, Bere Regis and Bovington will be up for further public consultation in 2011. "

Thus, Swanage residents read that the various and alternative sites on which development could take place were to be considered at a later date, as part of

the Site Allocations Plan in 2011. They assumed that at that time the number of homes to be built would also be decided upon. They were led to believe that the number of homes and the sites would not be part of this final Core Strategy document.

**Inaccessible Core Strategy Document**

The Core Strategy document was incomplete when it was put out for public consultation. Also, in order to understand it, numerous other documents needed to be read.

The document was not readily accessible - it was only available to view at libraries, Council offices and on the internet. If a person wanted their own copy, it cost £12 to buy. No precis was available.

Furthermore, it was exceptionally difficult to print off from the site. Frequently, the words "file damaged" would appear when the writer of these notes tried to access it.

Swanage has a large percentage of elderly people who do not own or use computers. Many, also, are unable to get to the library or Council offices.



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

3680  
15/12/10

District Council  
Planning & Policy  
15 DEC 2010  
ACKNOWLEDGEMENT  
DATE RECEIVED

Your Details	Agents Details (where relevant)
Title	MS
Name	SARAH ZYGA
Job Title (where relevant)	
Organisation (where relevant)	
Address	11 DOLPHIN COURT NORTHBROOK RD SWANAGE
Postcode	BH19 1AJ
E-mail	
Tel. Number	07866 706893

**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"/> <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 hear those who have indicated that they wish to participate at the oral part of the examination.

Signature

Date

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

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

Policy : SE South East Purbeck	Paragraph: 7.5.9	Map:
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Also Core Strategy Paragraph 4.2.1  
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)

The proposed extra 900 homes for Swanage will destroy the town's " unique qualities. " For the past 15 years, Swanage has had to suffer much of Purbeck's development. Indeed, about 34 per cent of Purbeck's new builds have been in the town.

The Core Strategy proposes to carry on with this destruction - despite the fact that there are very few jobs and employment chances in Swanage.

**Proposed Changes:**

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

The majority of the housing should be built in economic growth areas where there are job opportunities. The Core Strategy says these areas are at Holton Heath and Winfrith.

**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>SE South East Purbeck</i>	Paragraph: <i>7.5-9</i>	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

 Yes     No     No Comment

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

 Yes     No     No Comment

(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)

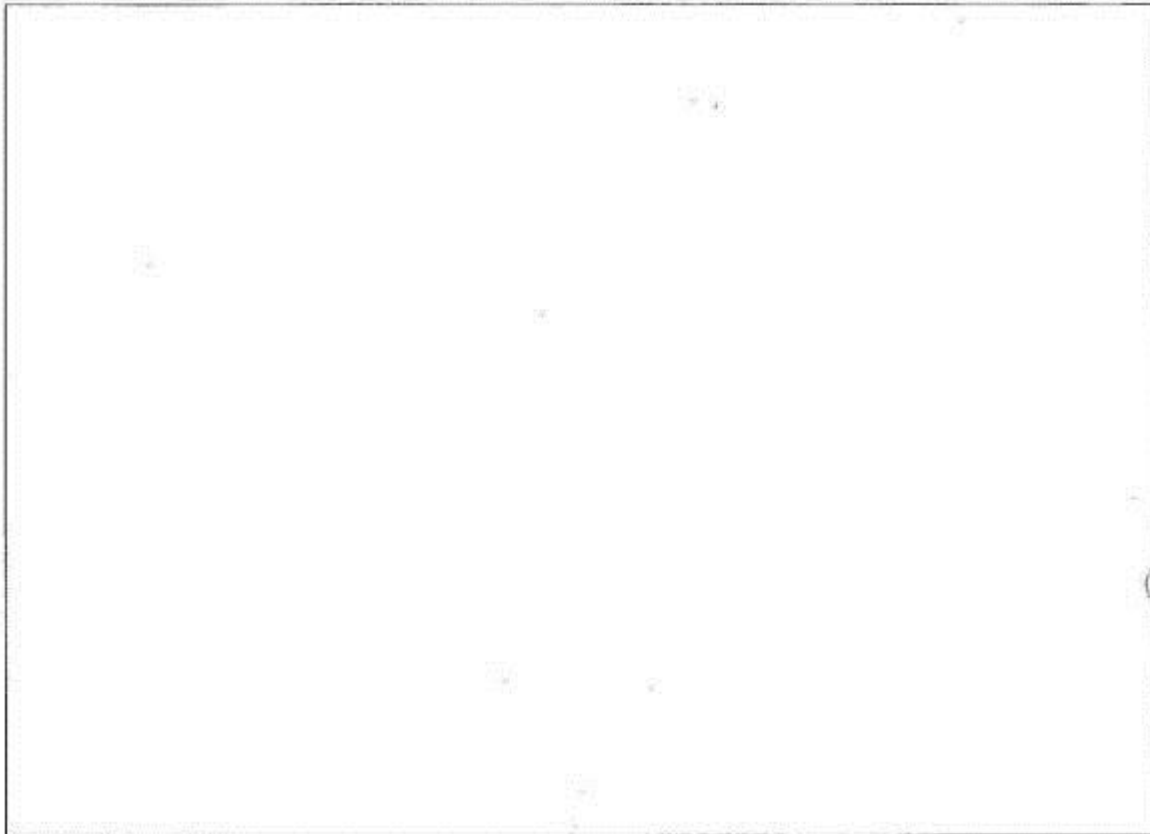
At no point in the " public consultation " were Swanage people given the option of less than 200 homes being built. Local people were never asked if they actually wanted 200 homes or whether they wanted less than that amount - such as none, 20 or even 50.

Nor were they asked if they wanted settlement extensions.

The need for 200 homes to be built by extending Swanage has not been made clear nor has there been an explanation of why this 200 figure has been chosen.

Furthermore, why do the settlement boundaries need to be extended? Is it not possible to build new homes within the current boundaries through in-fill etc?

If there were an increase in in-filling in Swanage, settlement extensions would be totally unnecessary.



**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 proposal to build 200 new homes in settlement extension(s) should not be put forward.

Delete : " Provision of a settlement extension(s) of 200 dwellings"



**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:

ELS Policy : <i>Employment Land Supply</i>	Paragraph: 6.5	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

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

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

(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)

Less than 3 per cent of employment land is in SE Purbeck - 2.5 per cent is in Swanage and 0.28 per cent is in Corfe Castle.

Yet the Core Strategy proposes to put a massive 37.5 per cent of the new housing into SE Purbeck.

This goes totally against the aim of cutting car use which is supposed to be a Core Strategy priority - see paragraphs 4.1.2, 4.1.4 and 4.3.1.

The lack of jobs and employment in Swanage and Corfe Castle and the large number of new homes being proposed for SE Purbeck ( 900 out of 2,400 ) means the Strategy is just 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).

Put the majority of the new housing and development nearer to conurbations which have a better link to employment and are in the economic growth areas. The Core Strategy says these are at Winfrith and Holton Heath.

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

Policy : <i>It's Housing Supply</i>	Paragraph: <i>6.3.4</i>	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<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"/>		

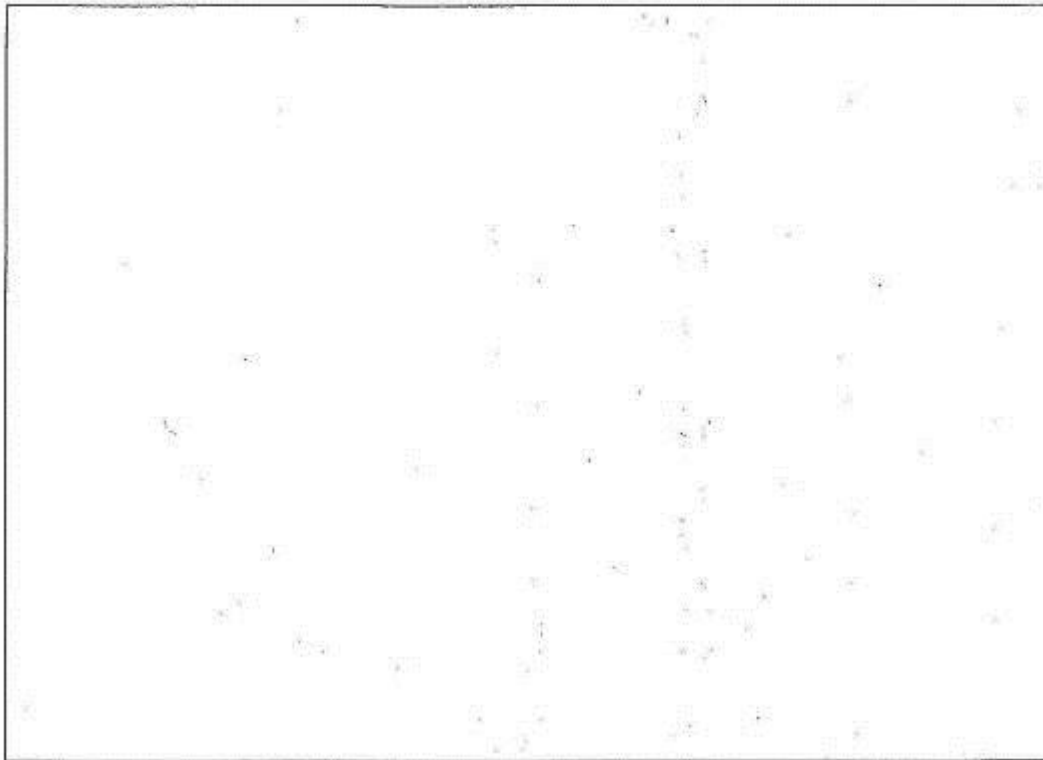
*(For explanation of terms refer to guidance notes below)*

**Comments:**

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

Regarding Swanage, the Habitat Regulations Assessment 5.52 says it is likely 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 an AONB and should be protected.



**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 mitigation proposals are not deliverable. *No more building on this AONB.*

|

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

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

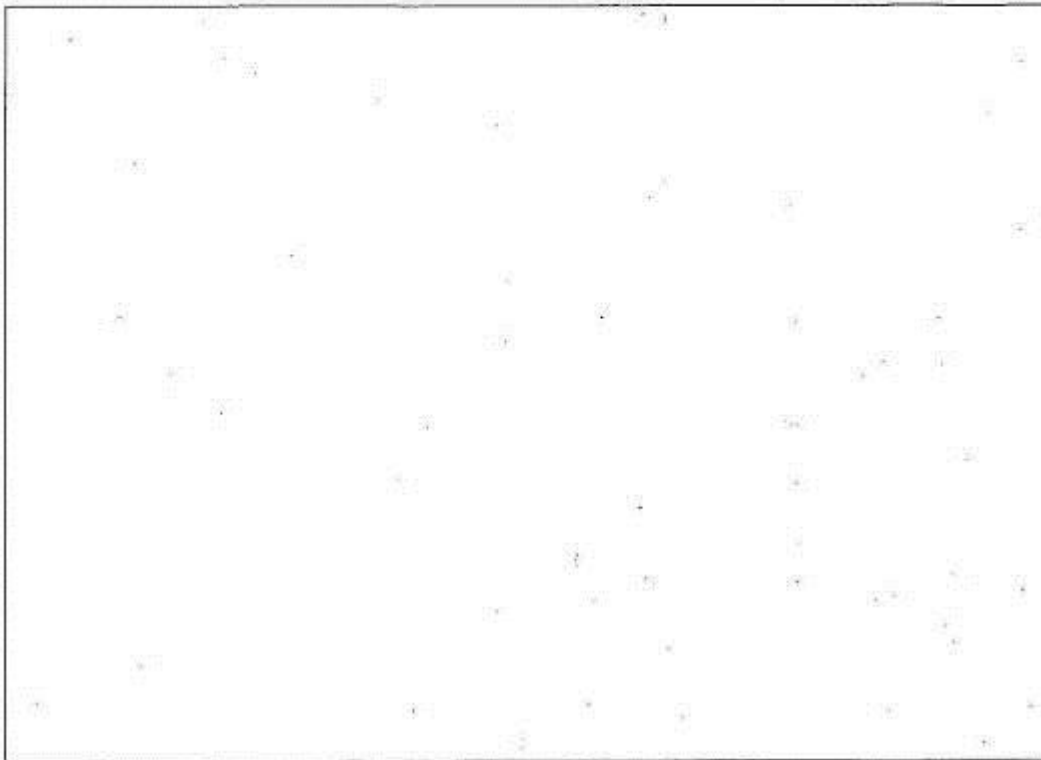
1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>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

Swanage is an internationally-renowned Area of Outstanding Natural Beauty and it is totally unique. The Core Strategy flies in the face of national legislation which says such areas should be conserved and enhanced. The laws were devised to protect such areas from the destruction that is being proposed by the Core Strategy.



**Proposed Changes:**

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

There should be no more building on this Area of Outstanding Natural Beauty .

**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy : <i>Housing</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 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)

2,100 new homes were originally allocated for Purbeck in the regional spatial strategy.

The Council increased this number to 2,400 without justification and without asking local people.

At the very least, the figure should be reduced to the original number of 2,100.

**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 box contains a handwritten response in black ink. The text reads: "The proposal to build 2,400 homes should not be put forward." The handwriting is somewhat casual and includes some stray marks around the text.

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