

Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010
Consultation Responses
Part 3**



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

Sent by email
20 December 2010

Reference 151047/AJII

Dear Sir / Madam

**Purbeck Core Strategy Pre-Submission Document
Response on behalf of JS Bloor (Newbury) Ltd in relation to
strategic land interest at Lytchett Minster**

I attach a response to the core strategy on behalf of JS Bloor (Newbury) Ltd in relation to its strategic land interest at Lytchett Minster.

Comment is made on the following

- The characteristics of Purbeck as set out on page 6 of the core strategy
- Policy LD (general location of development)
- Policy HS (housing supply) and paragraphs 6.1.2 – 6.1.4
- Reports by Footprint Ecology for Purbeck District Council (habitats regulations assessment and 'implications of additional strategic growth scenarios')

I confirm that JS Bloor (Newbury) Ltd would wish to participate at the oral part of the examination in relation to its Lytchett Minster land interest on all of the above matters.

Yours faithfully

Signature has been blanked out

Andrew Elliott
Technical Director

cc: Ron Hatchett, JS Bloor (Newbury) Ltd
Oliver Chamberlain, Chichesters

Planning
Design
Environment

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

Your Details		Agents Details <i>(where relevant)</i>
Title		Mr
Name		Andrew Elliott
Job Title <i>(where relevant)</i>		Technical Director
Organisation <i>(where relevant)</i>	JS Bloor (Newbury) Ltd	Terence O'Rourke Ltd
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Tel. Number		01202 421142

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments. Do you consider it necessary to participate at the oral part of the examination?

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

To amplify the objections made in each of the enclosed representations

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: A J Elliott

Date 20 December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy	Paragraph: 21 - 28	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 <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>			<input type="checkbox"/>
It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

It is considered that an understanding of transport patterns is a critical starting point for a strategy for Purbeck. Whilst paragraph 2.1 recognises links to the conurbation there is no reference to patterns of travel in 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).

An additional paragraph is required that summarises (1) the established out commuting patterns in Purbeck, emphasising the economic influence of the conurbation and the importance of the spatial relationship with it for working, shopping, higher order services etc, and (2) the principal patterns of movements into the district given the attractiveness of its many natural and cultural assets of the for tourism and recreation activities.

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	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"/>
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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)

It should be made clear that Policy LD applies only in a lower overall growth scenario for Purbeck, and that revision would be required in the event that a higher growth strategy is pursued.

The policy requires reference to the role and process of green belt review to accommodate development. Similarly the approach is incomplete without recognising the spatial relationship of development proposals to accessible strategic greenspace (SANGs) to help mitigate its impacts on European-protected habitats.

As part of a higher growth scenario the strategic location at Lytchett Minster close to the conurbation (referenced in paragraph 6.1.3) has the potential to perform very well in sustainability terms, notably in offering access to higher order services and facilities, supporting the economic growth and status of the conurbation, and in meeting the housing needs of the associated housing market area. In addition, a well located strategic SANG at Lytchett Minster could specifically help to divert some of the recreational impacts associated with existing and future residents the wider conurbation by intercepting leisure trips.

Proposed Changes:

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

It should be made clear that Policy LD applies only in a lower overall growth scenario for Purbeck, and that revision would be required in the event that one or more of the strategic locations identified in paragraph 6.1.3 are pursued.

JS Bloor (Newbury) Ltd proposes land at Lytchett Minister as offering the most potential for successfully accommodating strategic scale development in the District given the performance of this location against sustainability criteria

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

Policy HS	Paragraph: 6.1.2 - 6.1.4	Map
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

JS Bloor (Newbury) Ltd considers that the most suitable higher growth housing growth option is at Lytchett Minster close to the conurbation which has the potential to perform very well in sustainability terms, notably in offering access to higher order services and facilities, supporting the economic growth and status of the conurbation, and in meeting the housing needs of its associated housing market area.

JS Bloor (Newbury) Ltd does not consider that Purbeck DC's Habitats Regulations Assessment work is definitive in determining the minimum or maximum dwellings achievable within the District, for example it does not clearly identify suitable mitigation for the core strategy proposals.

It is considered that the evidence base is insufficiently robust and lacks credibility for the purposes of strategic planning in the district. For example it fails to identify the opportunity for the delivery of strategic greenspace mitigation provision as part of a large scale housing proposal at Lytchett Minster, the benefits of which could include diverting recreational pressures on protected habitats arising from trips to Purbeck from an origin within the conurbation.

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 HS should set out a clear process and timetable for considering the potential for higher levels of housing growth in Purbeck District, and the benefits of doing so in the context of Purbeck and the wider housing market area.

To achieve the above, in the first instance the production of a robust and credible delivery plan for higher levels of growth in Purbeck is required, supported by comprehensive sustainability appraisal and habitats regulations assessments. It is considered that this must be progressed as part of a multi agency - joined up approach - so that the delivery issues including the consideration of strategic mitigation proposals are comprehensively tackled.

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Comments:

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

As part of the evidence base for the core strategy, Purbeck District Council has published a report on the implications of additional strategic growth scenarios for European sites.

We agree that mitigation measures are potentially possible (paragraph 2.80), and that they become increasingly complex with higher levels of development. A key finding that we support is that the delivery of a small number of well located large SANGs sites is required in Purbeck, both as part of mitigation for core strategy proposed growth and as part of any additional strategic growth. However the means to deliver such provision has not been developed.

JS Bloor (Newbury) Ltd does not accept the robustness of the 'additional strategic growth report', and also has misgivings about the accuracy and completeness of the core strategy habitats regulations assessment, which can be explored further in detail at examination as necessary.

The technical work has overlooked the strategic mitigation opportunities offered by a large greenspace at Lytchett Minster, both in terms of the impacts of growth within Purbeck itself, and in

terms of the growth of the conurbation and associated patterns of recreational use. It is the view of JS Bloor (Newbury) Ltd that a large well planned proposal at Lytchett Minster, including a strategic SANG and housing growth, offers the most deliverable, sustainable and balanced package for dealing comprehensively with a variety of planning, environment and transport matters whilst successfully accommodating the needed higher levels of development.

Proposed Changes:

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Closer linkages between habitats regulations findings and core strategy policy is required, notably in terms of considering mitigation proposals. However, Bloor Homes Ltd does not consider that the current habitats regulations assessment is complete.

The evidence base requires development to further assess the mitigation potential and deliverability of strategic SANG sites, notably that at Lytchett Minster. A well located SANG at Lytchett Minster could specifically help to offset some of the existing and future recreational impacts from development in the wider conurbation by intercepting leisure trips.

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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)

The sustainability appraisal requires amendment to include consideration of options including higher levels of growth in the District. It should consider for example the merits of various scales of development at Lytchett Minster (the location identified by the draft Regional Spatial Strategy as offering significant potential for strategic development). At the present time it is unclear in the appraisal why the current level of growth has been selected having regard to sustainability considerations.

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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25

1805 - 2010

Terence O'Rourke Ltd
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Mr S Dring
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

9 December 2010

Our ref: 151016/JP

Dear Mr Dring

Draft Terence O'Rourke Ltd comments on the Habitat Regulations Assessment of the Purbeck Core Strategy Pre-submission draft

Further to your recent conversation with my colleague Martin Miller, I set out below our principal concerns with the above document for your informal consideration. We should be grateful for your reaction to our concerns before we make our formal response to the consultation document and would be happy to attend a meeting with you and Footprint Ecology should you feel this to be of assistance.

Overview

The draft document does not seem to adequately address the potential impacts of the Purbeck Core Strategy on a number of features of interest occurring within the European sites. Whilst lengthy consideration is given to potential impacts on certain features of interest, particularly Annex 1 breeding birds, other interest features receive no obvious consideration of potential impacts.

With the exception of inclusion in section 2 (European sites potentially affected by the Core Strategy) many features receive no detailed consideration of the likely significant effects of the Core Strategy on habitats or species of European importance. There is no obvious consideration of the potential impacts on Annex II species such as early gentian, great crested newt and southern damselfly included within the document. Similarly, a number of the Annex 1 habitats for which the sites are designated receive no assessment in the document. It is not clear whether this is because the authors consider there to be no impacts on these species and habitats or because the potential effects of the Core Strategy on these habitats have not been assessed.

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Environment

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VAT No. 975065727

Similarly, it is not clear whether or not an assessment of potential impacts on features of interest of the Ramsar sites has been undertaken or not as there is no specific reference to the interest features of these sites contained in the document. As noted in paragraph 1.9 of the Habitats Regulations Assessment it is government policy that the provisions of the Habitats Regulations are relevant to the protection of Ramsar sites as a matter of policy. To accord with government policy it is therefore necessary to determine whether the plan or project has any implications for the site in view of its conservation objectives

In-combination effects

Throughout the Habitat Regulations Assessment there is lack of consideration of the potential for the Purbeck Core Strategy to act in-combination with other plans and projects. This is an important omission as the Dorset Heaths SAC and Dorset Heathlands SPA in particular stretch over several districts and boroughs (see attached plan). The Habitat Regulations Assessment should assess the implications of the land use plan either alone or in-combination with other plans or projects, for the sites in view of their conservation objectives.

In the absence of any documented consideration of the plans and projects of other districts and boroughs that may affect the integrity of the European sites in question it is difficult to have confidence in the assertions within the document that the Purbeck Core Strategy will not act alone or in-combination with other plans or projects. Given that such a significant proportion of the European site lies outside of the Purbeck district there must clearly be potential for other plans and projects to impact on the interest features of such large and fragmented sites.

The Habitat Regulation Assessment focuses on impacts on those parts of the European sites falling within the Purbeck district and does not consider the potential for seemingly insignificant impacts within Purbeck to act with those in other districts and boroughs and impact on the integrity of the European sites as a whole. The approach adopted for the Dorset Heaths SAC and the Dorset Heathlands SPA is to assume that the draft DPD will undertake the in-combination assessment for these sites and recommend appropriate mitigation to address any adverse effects that may be identified. However, to date, very little progress has been made with this DPD.

Assessment of features of interest

It is noticeable in parts of the Habitat Regulations Assessment that the assessment of impacts associated with the Core Strategy appears rather generalised and does not specifically focus on the implications of the policies on the interest features of the European sites. Section 5 in particular appears to be addressing the potential impacts of urbanisation on heathlands and anthropogenic activities on certain species generally, rather than assessing the implications of the identified impacts on European features in light of the conservation objectives for the European site.

The document refers to extensive areas of land such as Hethfelton Plantation, Wareham Forest and Rempstone Heath, only parts of which are designated or classified. This section tends towards an assessment of the impacts of human activities on Annex 1 birds in these areas rather than a consideration of the potential

effects on the SPA populations. There is a notable lack of detail on how the specific impacts of the Purbeck Core Strategy on Annex 1 bird populations within these component parts of the SPA were determined. As most of the mitigation measures proposed in section 5 are derived due to the conclusion that Dartford warblers, nightjar and woodlark populations will be adversely affected by policies in the Core Strategy in the absence of mitigation, it is surprising that a more robust assessment is not undertaken to support the need for this mitigation.

The findings of published research on the impacts of various activities on breeding Annex 1 birds is not reviewed in the context of the known distribution of bird populations within the SPA and the modelling work predicting changes in visitor patterns as a result of the proposed developments within the Core Strategy. Other than general assumptions about the potential impacts on Annex 1 species within the SPA no evidence is provided by the authors to allow for the potential effects of the Purbeck Core Strategy to be evaluated. This makes it difficult to determine the appropriateness of the mitigation proposed because the scale of likely significant effect is not identified.

Other areas of concern include the lack of assessment of impacts associated with changes in air quality on habitats within the European sites. Section 11 deals only with impacts on dry and wet heath despite there being a wide range of other Annex 1 habitats that are reasons for the site designation. These include habitats whose sensitivity to nitrogen deposition is greater than those habitats discussed.

Mitigation measures

There are a number of other sections of the report where there is similar ambiguity over the proposed scale of the predicted impacts and the significance of those effects on interest features of the European sites. This leads to the inclusion in sections covering mitigation of measures that could not be considered mitigation, or that do not explain the need for the mitigation to adequately address the impacts on the interest features of the European site.

In Section 6.17 a re-routing of a pathway from the shoreline at Studland is proposed to mitigate potential impacts on bird populations in Poole Harbour SPA. This would mean the new path way would be located within the SAC and could impact on Annex 1 habitats or breeding heathland birds. In this case the mitigation required to mitigate significant effects for one European site could result in significant effects on the interest features a contiguous European site.

The recommendations for monitoring work to determine levels of disturbance in Poole Harbour and recording vegetation changes within Annex 1 habitats is not mitigation, despite being included in mitigation recommendations. If it is considered the Core Strategy is likely to have significant effects on European sites a pro-active series of mitigation measures will be required for implementation before potentially harmful aspects of the Core Strategy are implemented.

An approach that would monitor impacts and implement mitigation measures reactively would not appear to be compliant the precautionary principle required in the Habitats Directive. Recommendations for no net increases in visitors numbers to certain SACs made in paragraphs 5.41 and 7.25, would suggest that the authors consider any increase in visitor numbers to these sites could result in likely significant effects.

The document also recommends mitigation measures that appear to be beyond the remit of Purbeck District Council to influence. Paragraph 6.19 recommends that the launching of small craft within Poole Harbour should be limited to specific locations. There are no details about how the enforcement would work and what control Purbeck District Council would have over this measure. It appears that the implementation of certain elements of the Purbeck Core Strategy is dependent on mitigation measures that appear entirely unworkable at the current time.

Inconsistencies within the document

Throughout the document there appears to be a number of inconsistencies in the treatment of various impacts on European sites. Some of these, from section 7 of the Habitat Regulations Assessment are highlighted here, in addition to those already noted earlier.

In paragraph 7.30 it states that impacts of increased housing are potentially 'diluted' in that coastal sites are heavily visited by tourists, and receive many more visitors than, for example, the heaths. Visitor numbers given earlier in the document; one million visitors per year to Studland (paragraph 2.24) and 250,000 visitors to Durlston Country Park per year (paragraph 7.20), would suggest that for certain parts of the European sites this assumption is incorrect and some heathlands receive four times the numbers of visitors per year of other coastal SACs.

Paragraph 7.30 continues "Given some of the impacts (such as trampling and eutrophication) are similar for coastal habitats and heathland ones, the impact of new housing on coastal sites is potentially less than that on heaths". There is no explanation provided in the document as to how this conclusion was reached. The conclusion seems at odds with the statement in paragraph 7.10 that notes, "low productivity turf (e.g. calcareous grassland) is more prone to trampling and enrichment damage than more productive grassland and that recovery from such damage is slower".

Earlier in the document paragraph 7.21 highlights the 'considerable existing pressure' on dune and calcareous grassland SAC vegetation. These statements would suggest that there is already an appreciable impact on this habitat caused by existing recreational levels at these sites. Given this, it is difficult to understand how the conclusion of lesser impacts than on heathland can be reached.

Boxall J



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

	Your Details	Agents Details (where relevant)
Title	Mr	
Name	John Boxall	
Job Title (where relevant)	Retired	
Organisation (where relevant)		
Address	5c Highcliffe Rd	
Postcode	Swanage	
E-mail		
Tel. Number	429606	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
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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 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 : H.5.	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The Core Strategy. Does not include a proportionate amount of new jobs for Swanage to the number of dwellings proposed. Indeed the economic growth areas are at Holton Heath & Weymouth.

There are also infrastructure issues such as roads & transport which have not been given enough attention.

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).

Create bulk of housing in economic growth areas identified in Core Strategy as Holton Heath & Winfrith

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

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

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

Signature	Signature has been blanked out
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Date 11/12/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
(tick all that apply)			
It is not 'justified' <i>(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)

Consultation misleading. Did not ask if people wanted.
 200 Houses on settlement extensions in Swanage. There was
 no chance to choose fewer houses nor was there a
 zero option.

Proposed Changes:

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

We would support utilizing the Grammar school site, for up to 100 Houses. The Henston site is a greenfield A.O.N.D. site and covers protected habitats.

5473
20/12/10



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

Your Details

Agents Details (where relevant)

Title	MRS	
Name	MARGARET BRIDLE	
Job Title (where relevant)	RETIRED	
Organisation (where relevant)	✓	
Address	14 SANDRINGHAM CT SWANAGE	
Postcode	BH19 2PA	
E-mail		
Tel. Number	01929/421308	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

Signature	Signature has been blanked out	Date 11.12.10
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : SE	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
---------------------------------	---	--

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

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:

(tick all that apply)

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)

To build 260 houses in or on the outskirts of Swanage which is an area of outstanding natural beauty would be detrimental to the town and probably become holiday homes. The traffic, particularly in summer is very bad. Also the infrastructure of the town would suffer. Our amenities are very sparse so it is, but this would make it worse.

Burbidge F

3422
16/12/10

15 December 2010
Your Ref:PLS/3422

5 Pryors Walk
Lytchett Matravers
Poole BH16 6NH

01201 631673 home
01201 676796 work

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



Dear Sirs

Planning Policy - Core Strategy Consultation North East

With reference to your letter 8 November 2010, I reply as follows:

I object to Huntick Road being chosen by the council for future development in Lytchett Matravers for the following reasons:

Approximately 50 dwellings on this site would be high density, which I consider does not contribute for families to live in space and harmony. Huntick Road would be too congested with traffic which would make the road very dangerous especially for children.

My brother, Keith Burbidge and I own land at Deans Drove/Foxhills Lane, approximate 6 acres in area. We feel that our site is also appropriate for planning. Our land has a long history of being zoned for planning since the early 1970s and the plot at Deans Drove was still in the development plan until 1981. Main drainage was put in the late 1960s with a view to future development. Deans Drove has wide verges suitable for footpaths making it safe for children to walk to the school at the top of Deans Drove. Like the Huntick Road site the area at Deans Drove and Foxhills Lane is not located within an area of flood risk.

Continued

- 2 -

We suggest that the proposed development in Lytchett Matravers should be split between different sites including Huntick Road and Deans Drove which would have a less impact on the surrounding countryside. Various sites around the village would reduce the financial risk with the use of different builders, and increase the architectural diversity of the developments.

Our land can be divided up, please see the attached plans, into land fronting onto Deans Drove and land south of Deans Drove.

My brother and I would consider affordable housing on the land we own, as we feel that local people whose families have been in the village for many generations should have the opportunity to live in the village.

I am happy to attend any public enquiry and express my views on future planning in Lytchett Matravers.

Yours faithfully

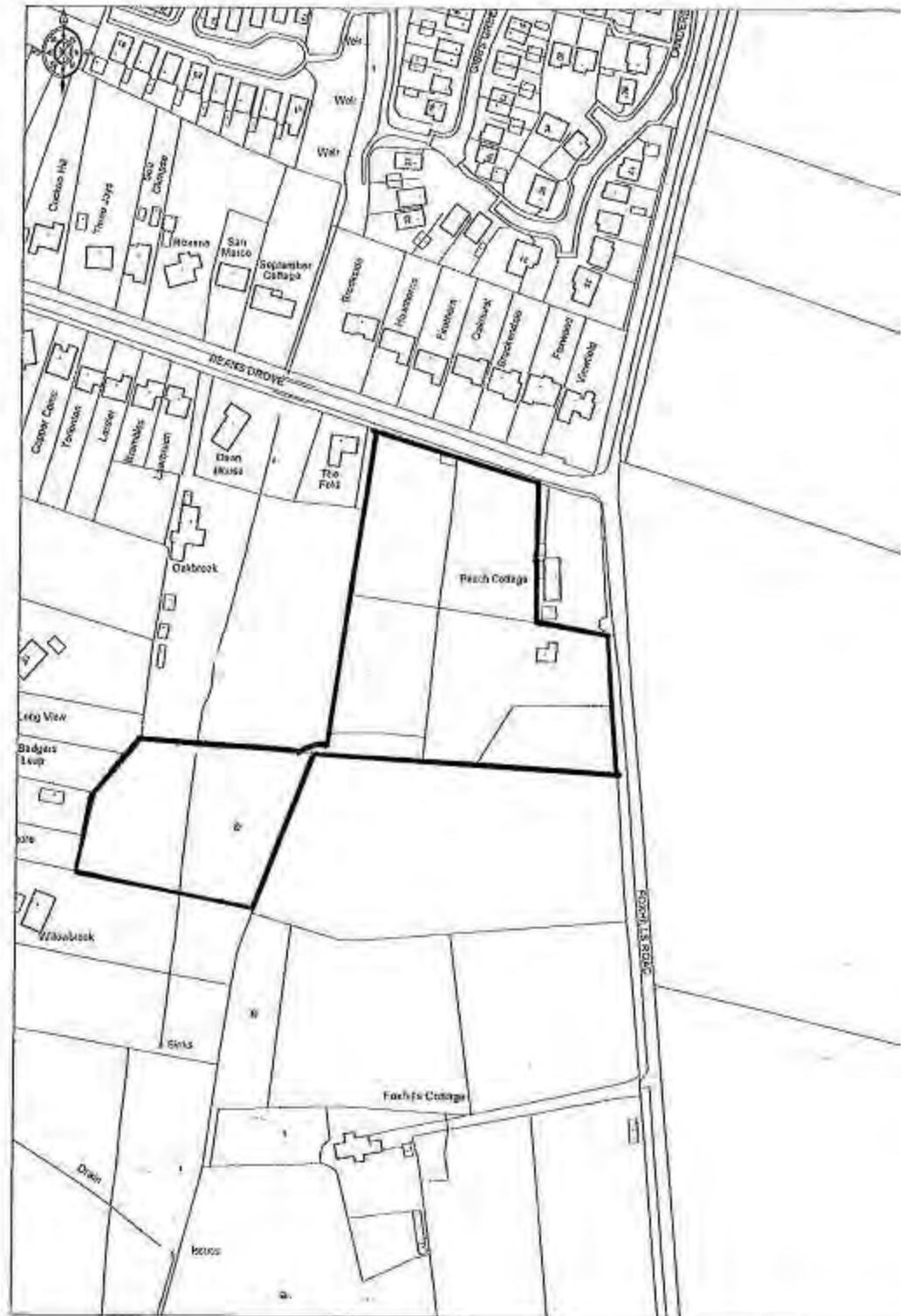
Signature has been blanked out

Fenella Burbidge (Miss)

Land south of Deans Drive



Land south of Deans Drove



Burt B & C

From: Bob & Carol Burt [mailto:bobcarol-swanage@tiscali.co.uk]
Sent: 18 December 2010 16:57
To: email-Enquiries
Subject: Core Strategy comments

18th December 2010

Dear Sirs

We are most concerned at the way the proposed building of more houses in Swanage seems to be being handled.

When we had the Options document through our door several months ago it seemed that the Council's Preferred Option (not ours) was for 206 dwellings, the Alternative Option A (our choice) was for no settlement extension, and the Alternative Option B (disastrous) was for 412 dwellings. We duly sent our comments and preferred Option to the Council

Now, looking on-line at the current enormous Core Strategy document up for discussion we see that the proposed number of dwellings for South East Purbeck has risen to 900 dwellings! Unbelievable!

Swanage is a unique place, we are 'out on a limb' which is why most people here choose to live here. We simply could not accommodate these hundreds of new homes. Even if there was the space (which there certainly is not), where are all these people going to earn their living? Where are all their cars going to go? Etc. etc.

We find it absolutely unbelievable that people who were voted on to the Council to 'look after' the area are wanting to completely desecrate it.

We object in the strongest possible terms to these proposals.

Yours faithfully

Mr and Mrs Bob and Carol Burt
11 Bonfields Avenue
Swanage



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

Your Details	Agents Details <i>(where relevant)</i>
Title	
Name	Lynne Evans
Job Title <i>(where relevant)</i>	Consultant
Organisation <i>(where relevant)</i>	C G Fry & Son Ltd.
Address	Southern Planning Practice
Postcode	Youngs Yard, Churchfields, Twyford, WINCHESTER, Hants
E-mail	SO21 1NN
Tel. Number	lynne@southernplanning.co.uk
	01962 715770 07973 717869

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments. Do you consider it necessary to participate at the oral part of the examination?

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

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

We consider it necessary to take part at the oral part of the examination because the representations raise complex and important policy issues which require to be debated at the examination in order that the Inspector can be properly informed in reaching a conclusion on the soundness of the Core Strategy.

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 L J Evans LYNNE EVANS SOUTHERN PLANNING PRACTICE

Date 20 December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

There is no evidence in terms of the role and functions of the settlement to designate Upton as a Town under the hierarchy of settlements. This hierarchy appears to reflect the hierarchy which was set out under the draft Regional Spatial Strategy and this has not been reappraised in the light of local evidence. The evidence points to a downgrading of Upton. The policy is therefore in this respect in conflict with evidence and unsound.

The Policy indicates that settlement boundaries will be reappraised in the Site Allocations Plan and that in the interim the policy boundaries in the existing Local Plan will be maintained. However, other policies for example Policy NE seek to amend the settlement boundaries through the Core Strategy where green belt boundaries are involved. The policies are inconsistent and therefore unsound.

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):

Upton should not be categorised as a town and downgraded.

The policy should be amended to indicate that where changes to settlement boundaries will also involve a review of the green belt boundary, this will be undertaken in the Core Strategy.

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

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

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

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
- It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Please see attached representations in respect of Policy HS

Purbeck CS Pre Sub C G Fry Policy HS, and
Purbeck CS Pre Sub C G Fry Policy NE

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).

Please see attached representations in respect of proposed changes to Policy HS

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: 6.1-6.4	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

Please see representations in respect of Policy HS which equally apply to the supporting text.
Documents: Purbeck CS Pre Sub C G Fry Policy HS and Purbeck CS Pre Sub C G Fry Policy NE

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 supporting text will require amendment in the light of the proposed representations and proposed changes to Policy HS.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
- It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Please see the attached representations and associated attachments in respect of Policy NE:

- a) Purbeck CS Pre Sub C G Fry Policy NE
- b) Purbeck CS Pre Sub C G Fry Policy HS
- c) Report by Laurence Rae Associates Ltd: Transport Statement, including Fig 1 and appendices
- d) Report by SLR Consulting: Outline Appraisal of Potential Impacts upon Dorset Heathlands European Wildlife Sites from Residential Development at Lytchett Matravers and Options to Mitigate Such Impact.
- e) Report from C G Fry: Comments on the Purbeck District Council Viability Report Update Study October 2010 including appendices
- f) Figures A, B and E

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).

Please see the proposed changes set out under the attached representations under reference
Purbeck CS Pre Sub C G Fry Policy NE

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

1. Legally compliant <i>(i.e. comments on the process of preparing Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
2. (a) Sound <i>(i.e. comments on the content of Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
• It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>			<input checked="" type="checkbox"/>
• It is not 'consistent with national policy'			<input 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 supporting text to Policy NE is unsound for the same reasons set out in the representations submitted to Policy NE - please see documents submitted in support of representations to Policy NE and in particular Purbeck CS Pre Sub C G Fry Policy NE.

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 supporting text will require amendment in the light of the submitted representations and proposed Policy changes to Policy NE

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: 12
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

Map 12 is unsound for the reasons set out in the representations to Policy NE ; Please see document Purbeck CS Pre Sub C G Fry Policy NE.

Proposed Changes:

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

Map 12 will require amendment in the light of the representations and proposed policy changes to Policy NE.

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



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

Your Details		Agents Details (where relevant)
Title		
Name		Lynne Evans
Job Title (where relevant)		Consultant
Organisation (where relevant)	C G Fry & Son Ltd.	Southern Planning Practice
Address	c/o Southern Planning Practice	Youngs Yard, Churchfields, Twyford, WINCHESTER, Hants
Postcode		SO21 1NN
E-mail		lynne@southernplanning.co.uk
Tel. Number		01962 715770 07973 717869

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments. Do you consider it necessary to participate at the oral part of the examination?

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

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

We consider it necessary to take part at the oral part of the examination because the representations raise complex and important policy issues which require to be debated at the examination in order that the Inspector can be properly informed in reaching a conclusion on the soundness of the Core Strategy.

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 L J Evans LYNNE EVANS SOUTHERN PLANNING PRACTICE

Date 20 December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : 	Paragraph: 	Map: Inset Map 1
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Inset Map 1 is unsound for the reasons set out under the representations relating to Policy NE:
Please see document Purbeck CS Pre Sub C G Fry Policy NE

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)

Inset Map 1 will require amendment in the light of and in response to the policy changes sought to Policy NE.

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Please see submitted representations in respect of Policy AHT - document entitled Purbeck CS Pre Sub C G Fry AHT.

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).

Please see submitted representations for proposed Policy changes to Policy AHT - document reference as 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: 8.3	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

Please see submitted representations in respect of Policy AHT which equally apply to the supporting text - document ref Purbeck CS Pre Sub C G Fry AHT.

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 supporting text will require amendment in the light of the submitted representations and proposed changes to Policy AHT - document reference as 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 : AH	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

Please see submitted representations to Policy AH - document ref: Purbeck CS Pre Sub C G Fry AH.

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).

Please see proposed changes as included in representations to Policy AH - document reference as 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: 8.4	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

Please see submitted representation to Policy AH which equally apply to the supporting text - document reference Purbeck CS Pre Sub CG Fry AH.

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 supporting text will require amendment in the light of the submitted representations and proposed policy change to Policy AH - document reference as 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 : SD	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:			
<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)

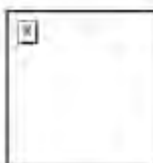
Please see submitted representations in respect of Policy SD - document reference Purbeck CS Pre Sub C G Fry SD.

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).

Please see submitted representations for proposed policy changes to Policy SD - document reference as 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		
Name		Lynne Evans
Job Title (<i>where relevant</i>)		Consultant
Organisation (<i>where relevant</i>)	C G Fry & Son Ltd.	Southern Planning Practice
Address	c/o Southern Planning Practice	Youngs Yard, Churchfields, Twyford, WINCHESTER, Hants
Postcode		SO21 1NN
E-mail		lynne@southernplanning.co.uk
Tel. Number		01962 715770 07973 717869

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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- 10th November, 7pm in the District Council offices, Wareham
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- 1st December, 7pm in the District Council offices, Wareham

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

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

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

We consider it necessary to take part at the oral part of the examination because the representations raise complex and important policy issues which require to be debated at the examination in order that the Inspector can be properly informed in reaching a conclusion on the soundness of the Core Strategy.

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 L J Evans LYNNE EVANS SOUTHERN PLANNING PRACTICE

Date 20 December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

Policy : 	Paragraph: 8.15	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Please see submitted representations to Policy SD which equally apply to the supporting text-document reference: Purbeck CS Pre Sub C G Fry SD.

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 will require amendment in the light of the representations and proposed Policy changes to Policy SD - document reference as 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 type="checkbox"/>	Sustainability Appraisal <input checked="" type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
---	---	---

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

Policy :	Paragraph: Appendix 10: Lytchett Matravers Site A	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Lytchett Matravers Site A: Please see representations submitted under ref Purbeck CS Pre Sub C G Fry SA A

Proposed Changes:

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

Please see representations submitted under ref PURbeck CS Pre Sub C G Fry SA A

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

Policy :	Paragraph: Appendix 10 Lytchett Matravers Site B	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

Lytchett Matravers Site B: Please see representations submitted under Purbeck CS Pre Sub C G Fry SA B

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).

Please see representations submitted under Purbeck CS Pre Sub C G Fry SA B

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

Policy :	Paragraph: Appendix 10 Lytchett Matravers Site E	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
- It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Lytchett Matravers Site E: Please see representations submitted under Purbeck CS Pre Sub C G Fry SA E

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).

Please see representations submitted under Purbeck CS Pre Sub C G Fry SA E.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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 <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)

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : <input type="checkbox"/>	Paragraph: <input type="checkbox"/>	Map: <input type="checkbox"/>
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
- It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Proposed Changes:

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

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



Purbeck Core Strategy: Pre Submission Draft

Representations by Southern Planning Practice Ltd on behalf of C G Fry Limited

**Policy AH: Affordable Housing (as amended by Schedule of Amendments dated 08 November 2010)
Paragraphs 8.4.1 – 8.4.3**

Please read these representations together with submitted report by C G Fry & Son Ltd's report entitled: Comments on the Purbeck District Council Viability Report Update Study October 2010 (evidence base).

C G Fry & Son fully supports the principle of Policy AH in so far as it seeks to bring forward affordable housing in response to the identified need within the district. However it raises a strong objection to the quotas set out in the policy for the reasons set out in detail in the attached report by C G Fry: Comments on the Purbeck District Council Viability Report Update Study October 2010.

The policy appears to be largely based on the Residential Economic Viability Assessment from 2008 and updated in October 2010. The attached report undertakes a detailed assessment of the October 2010 report and questions the assumptions made and demonstrates that by altering the assumptions even by small amounts the conclusions are radically altered.

It is therefore concluded that the proportion of affordable housing sought will hinder housing development coming forward and frustrate the realisation of the fundamental policy objectives of the Core Strategy. The policy is therefore ineffective and unsound.

Proposed Changes:

- Review the minimum targets set out under Policy AH.

CGFry/LJE/17 12 10



Purbeck Core Strategy: Pre Submission Draft

Representations by Southern Planning Practice Ltd on behalf of C G Fry Limited

Policy AHT: Affordable Housing Tenure Paragraphs 8.3.1 to 8.3.5

Paragraphs 8.3.1 to 8.3.4 of the CS refer to the need to produce balanced communities and refer to the results of a Balanced Housing Model (BHM). It is agreed that the aim of sound planning policy should be to create and maintain balanced communities. The BHM suggests that the tenure mix split for affordable housing should be 67% social rent and 33% intermediate. Policy AHT, however, requires a tenure split of 90:10 and there seems to be no adequate justification or sound evidence to support this leap from the BHM suggestion to Policy AHT.

It is contended that a requirement for 90% social rented housing is problematic and, indeed, unsound for several reasons. Firstly, by insisting on 90% social rent, the LPA is not creating and maintaining balanced communities. The pendulum swings too far in favour of social rented accommodation. This is particularly true of a policy framework that requires upwards of 40% affordable housing because not only is the balance between different tenure types lost but the balance between different size types of market and affordable housing is also eroded.

Secondly, in C G Fry's considerable regional experience in working in a difficult post-HCA grant and post-credit crunch market, the days of current Local Plan policy and practice requiring a 90/10 split are long gone. Local Planning Authorities across the region are taking a much more proactive and sensible approach to the delivery of affordable housing tenure mixes and are reducing the amount of social rent in favour of intermediate to improve the attractiveness and viability of developments. It is true to say that, rarely, LPAs will permit a 50/50 split but, in C G Fry's experience, splits of 60/40 are not uncommon (even in a difficult market with no HCA grant).

Thirdly, the LPA will no doubt argue that it is planning for the long-term and that it needs to address its housing needs over the whole Plan Period and not in response to a downturn in the market. The Inspector's attention is drawn to C G Fry's accompanying "Comments on the Purbeck District Council Viability Report Update Study October 2010" where matters relating to scheme viability and the use of the Three Dragons Model are discussed. In C G Fry's view and extensive recent local experience, it is likely that current market conditions, and the impact they have on viability and scheme delivery, will be with us for a number of years to come. Typically, the land market takes around 5 to 7 years to recover from a recession and this particular recession has bitten harder and deeper than others. It is therefore entirely reasonable to assume that current market conditions will be with us for a substantial proportion of the Plan Period.

It must therefore follow that scheme viability and affordable housing delivery must be supported by a more flexible and less aspirational policy than those currently proposed by the LPA. Market conditions, the availability of HCA grant and the assumptions plugged in to viability testing models are all susceptible to change although the former two not necessarily in the foreseeable future. It is

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therefore unsound and inflexible to impose a tenure mix split of 90/10 in favour of social rent and Policy AHT should be removed from the Plan. If it is to remain, it should be framed in a much more flexible way or should simply state an aspiration that the proportion of social rented housing will be maximized wherever possible having regard to market conditions and scheme viability. Ideally, Policy AHT should be delegated to a forthcoming SPD that can draw out these issues in a more flexible and realistic way.

Proposed Changes:

Delete Policy AHT for more detailed consideration in SPD.

If Policy is to remain, it should be redrafted to seek that the proportion of social rented housing should be maximized, having regard to current market assessments as well as market conditions and scheme viability.

CG FRY/LJE/17/12/10

17th December 2010

Mrs Lynne Evans
Southern Planning Practice Ltd

SENT BY EMAIL

Our Ref: 422.03038.00023

Dear Lynne

RE: OUTLINE APPRAISAL OF POTENTIAL IMPACTS UPON THE DORSET HEATHLANDS EUROPEAN WILDLIFE SITES FROM RESIDENTIAL DEVELOPMENT AT LYTCHETT MATRAVERS AND OPTIONS TO MITIGATE SUCH IMPACTS

Introduction

SLR Consulting Ltd (SLR) has been commissioned by CG Fry (via its planning adviser Southern Planning Practice Ltd) to provide an outline assessment of the potential impacts of residential development at Lytchett Matravers, in Purbeck District, upon the Dorset Heathlands European Wildlife Sites. The detail below assesses the potential issues and sets out how development at Lytchett Matravers can be undertaken in such a way that it mitigates the potential impacts upon the European Wildlife Sites.

Background

Purbeck's Pre-Submission Core Strategy¹ document is currently undergoing public consultation prior to submission to the Secretary of State. The consultation document sets out a planning strategy for the district for 2012-2026, which includes the identification of areas for housing to meet the Core Strategy's target of 50 new dwellings in Lytchett Matravers (part of the district wide target for 2006-2026 of 2400 new homes). At the current time there are five locations identified in the consultation document around the Lytchett Matravers settlement, these being identified as sites A, B, C, D and E. In this instance C G Fry have options on Sites A and B which are located on the north-eastern side of the settlement and site E which is to the south.

Approximately 21% of the Purbeck District is internationally important for wildlife and as such it has a range of international designations that include the whole of the Dorset Heaths (Purbeck and Wareham) and Studland Dunes Special Area of Conservation and the largest part, by district, of the Dorset Heath Special Areas of Conservation (SAC)/Dorset Heathlands Special Protection Area (SPA) and Ramsar site. From here onwards any component sites to these SACs/SPAs and Ramsar sites shall be referred to as the 'Dorset Heathlands European Wildlife Site'.

¹ Purbeck District Council (2010) Planning Purbeck's Future Core Strategy Pre-Submission Consultation 1 November – 20 December 2010.



European wildlife sites are protected by the EC Birds and Habitats Directives, specific provisions of which are applied in the UK by The Conservation of Habitats and Species Regulations 2010 (the Habitats Regs). Local Authorities must have regard to these requirements and follow a procedure in deciding whether to approve a proposal (a plan or project) that will potentially affect a European wildlife site.

Regulation 61 of the Habitats Regs requires that any application for development or strategic plan or policy which is likely to significantly affect a European site is subject to an appropriate assessment of the implications of the proposal for the site's conservation objectives. The planning authority must ascertain that the plan or project will not have an adverse effect on the integrity of the site, alone or in combination with other plans or projects, either directly or indirectly, taking account of any conditions or restrictions that would help ensure no adverse effect, before granting permission or adopting a plan or policy.

Spatial Objective 3: Conserve and enhance Purbeck's natural habitat/ Policy DH: Dorset Heaths International Designations of the Core Strategy sets out that:

"Development will not be permitted unless it can be ascertained that it will not lead to an adverse effect upon the integrity, of the Dorset Heaths' International designations."

It also goes on to state that no residential development shall take place within 400m of such a designated site and that:

"Between 400 metres and 5km of a heathland, new residential development will be required to take all necessary steps on site to avoid or mitigate any adverse effects upon the internationally designated site's integrity or, where this cannot be achieved within the residential development, to make a contribution towards mitigation measures designed to avoid such adverse effects taking place. Measures will include:

- *Provision of open space and appropriate facilities to meet recreation needs and deflect pressure from heathland habitats;*
- *Heathland support areas;*
- *Warden services and other heathland management;*
- *Access and parking management measures; and*
- *Green Infrastructure."*

As part of the evidence base to support the Core Strategy Purbeck District Council commissioned Footprint Ecology to prepare a report on the implications of growth in the district upon European Protected Sites².

The Footprint Ecology report identifies that the recreational use of heathland sites can have impacts upon the flora and fauna of such sites and as such their conservation value. An increase in housing can result in the redistribution of people and increase the local population size which in turn increases the recreational use of such areas.

To address this matter a number of local planning authorities that have part of the Dorset Heathlands European Wildlife Site with their boundary have jointly developed and adopted an Interim strategy³. The Interim Planning Framework (IPF), which will be subsequently

² Footprint Ecology (September 2010) Purbeck Core Strategy, Implications of Additional growth scenarios for European Protected Sites.

³ Borough of Poole, Bournemouth Borough Council, Christchurch Borough Council, Dorset County Council, East Dorset District Council & Purbeck District Council (April 2010) The Dorset Heathlands – Interim Planning Framework 2010-2011.

replaced by a joint Heathlands Development Planning Document DPD, makes strategic access management and green space provision across South East Dorset to avoid adverse effects arising from additional residential development around the Dorset heaths. The strategy as set out in the IPF is being implemented already.

There are however delays with the development of the DPD so currently the longer term strategy for mitigating impacts is still not available.

Lytchett Matravers and the Dorset Heathland European Protected Sites

The settlement of Lytchett Matravers lies outside the 400m buffer zone around such designated sites. It does however sit within the 400m to 5km zone.

With respect to CG Fry's development option areas at this settlement the relative distances to the European Wildlife Sites are as follows:

- ✦ Site A lies on the north-east side of Lytchett Matravers and is approximately 2.5km from the European Wildlife Site (Upton Heath) to the south-east with a travel distance is approximately 3.9km;
- Site B lies on the north-east side of Lytchett Matravers and is approximately 2.3km from European Wildlife Site (Upton Heath) to the south-east with a travel distance of approximately 3.6km; and
- ✦ Site E lies on the south side of Lytchett Matravers and is approximately 1.9 km from European Wildlife Site (Holton Heath) to the south with a travel distance of approximately 3.2km.

Due to the relative position of these potential development sites within 5km of the Dorset Heathlands European Wildlife Site consideration must be given to the potential impacts of the development.

Potential impacts and Mitigation

Natural England has expressed concern about the intensification of residential development in South East Dorset and the resultant pressures placed upon protected heathland by new occupants living in close proximity to the heathlands. These are similar to the impacts being observed within the Thames Basin Heaths SPA. Various studies have found that public access to lowland heathland, from nearby development, has led to an increase in wild fires, damaging recreational uses, the introduction of incompatible plants and animals, loss of vegetation and soil erosion and disturbance by humans and their pets amongst other factors.

This is most marked for development within 400m of heathland where Natural England advise that additional residential development is likely to have a significant adverse effect upon the designated site, either alone or in combination with other developments save in exceptional circumstances. Lytchett Matravers falls outside this zone.

As a result of being, at its closest point 1.9km from the Dorset Heathlands European Wildlife Site Lytchett Matravers falls in the 400m to 5 km zone.

Studies that have been undertaken (at the Thames Basin Heaths SPA) conclude that an increase in population around such sites can lead to an increase impact upon ground nesting bird species in areas where recreation is allowed on the heathland. Evidence from visitor surveys showing that the significant majority (70%) of visitors to such heathland sites originate from within 5km (radial distance). Further to this, an additional 10% of visitors

come from the 5-7km radial distance from the SPA, but after 7km the number of visitors falls off significantly.

Natural England considers that Local Authorities undertaking appropriate assessment will still identify a significant adverse effect in combination with other proposals, but that avoidance or mitigation measures can allow development to be approved. Mitigation of this effect would encompass measures to divert recreational pressure away from heathland access management measures and resources to enable the aforementioned to be implemented.

Mitigation of Potential Impacts

The IPF, which will be replaced by the DPD, sets out the current strategy to mitigate for the potential impacts that an increased population may have upon the designated sites. This strategy relies upon the delivery of areas of Suitable Alternative Natural Greenspace (SANG) through the acquisition of land and its appropriate management, the improvement of facilities at existing recreational sites, improvement of walk networks and cycle ways, creation of BMX and skate parks and a dog gym. Further to this there are also steps being taken to control visitors and to put in place fire control measures as a number of vulnerable urban heathland sites.

This mitigation strategy has been fully costed (£3.5M) and apportioned to the predicted increase in population that would arise from the residential development proposed by the local planning framework. Under this scheme it is set out that developments would contribute £1,724 per house and £1,034 per flat to fund the mitigation.

Natural England's advice is that together these comprise an appropriate package of measures to reduce to an insignificant level the harm that would otherwise occur to protected heathland.

The IPF sets out that large scale developments will be expected to explore ways of mitigating its adverse impacts. This may be through on site or off site measures providing measures to facilitate the implementation of natural greenspace. There is however no defined level at which a development is considered to be large scale.

In different regions similar issues relating to residential development close to other internationally important heathland sites, the Thames Basin Heaths SPA, have resulted in a different approach being adopted. In the Thames Basin developers have been expected to provide Suitable Alternative Natural Greenspace (SANG) as part of their mitigation proposals. The broad aim of SANG is to provide an alternative recreational resource for the increase population that arises from the increase in population that results from additional housing. Where a developer provides a SANG of appropriate size (relative to the scale of development) and quality it is possible to mitigate the potential impacts from its own scheme and in combination with others upon the international wildlife site.

Residential development at Lychett Matravers

All the identified preferred areas for development around this settlement whether controlled by CG Fry or others, are located within the 400m to 5km zone around the Dorset Heathlands European Wildlife Site. Any residential development in this zone, due to the potential for impacts upon a European Wildlife Site, will require a scheme of mitigation to ensure that the impacts are reduced to acceptable and not significant levels.

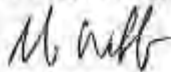
Mechanisms have been set in place through the IPF to assist with such mitigation either by the provision of a financial contribution per dwelling to fund the creation and management of alternative recreational sites or via the provision of Suitable Alternative Natural Greenspace by the developer (or a combination of both). The IPF has a limited life however and it will be replaced by the DPD. The principles of mitigating impacts upon the Dorset Heathlands are however likely to remain the same.

The CG Fry controlled land at Lytchett Matravers allows for the development of a generously proportioned area of Suitable Alternative Natural Greenspace (SANG) located on site B. This alone has the capacity to mitigate the potential effects of residential development at Lytchett Matravers at a scale much larger than that proposed in the core strategy (50 dwellings). As the principle behind SANGs is to provide an area of recreational space, it's size is relative the scale of the development itself (the head count of new residents), the more dwellings a scheme has the larger the SANG will be. As it is important that SANGs provide a feeling of openspace and relative isolation from others, diversity of user experiences (varied walking routes and variety of features and habitats) a larger SANG has much higher value to the local community and as such it is more effective in mitigating the impacts. Additional to this it can also draw in users from existing settlements that may otherwise have travelled to the heathland sites.

In conclusion, regardless of whether the scheme comprises 50, 100, 150 or 200 dwellings it is considered that the potential effects of development upon the Dorset Heathlands European site can be mitigated to appropriate levels. Mitigation could be through financial contributions to a scheme such as that set out in the IPF (to be replaced by the DPD) or via on-site mitigation following those principles that have been adopted elsewhere in the UK, or even a combination of both. There is potential that a larger scheme can deliver a greater opportunity for Suitable Alternative natural Greenspace that would mitigate impacts from new development here as well as potentially drawing other existing recreational users of the Dorset Heathlands away from these sensitive sites.

Yours sincerely

SLR Consulting Limited



Mike Webb
Technical Director

Site A - Land at Flowers Drive, Wimborne Road, Lycecht Matravers

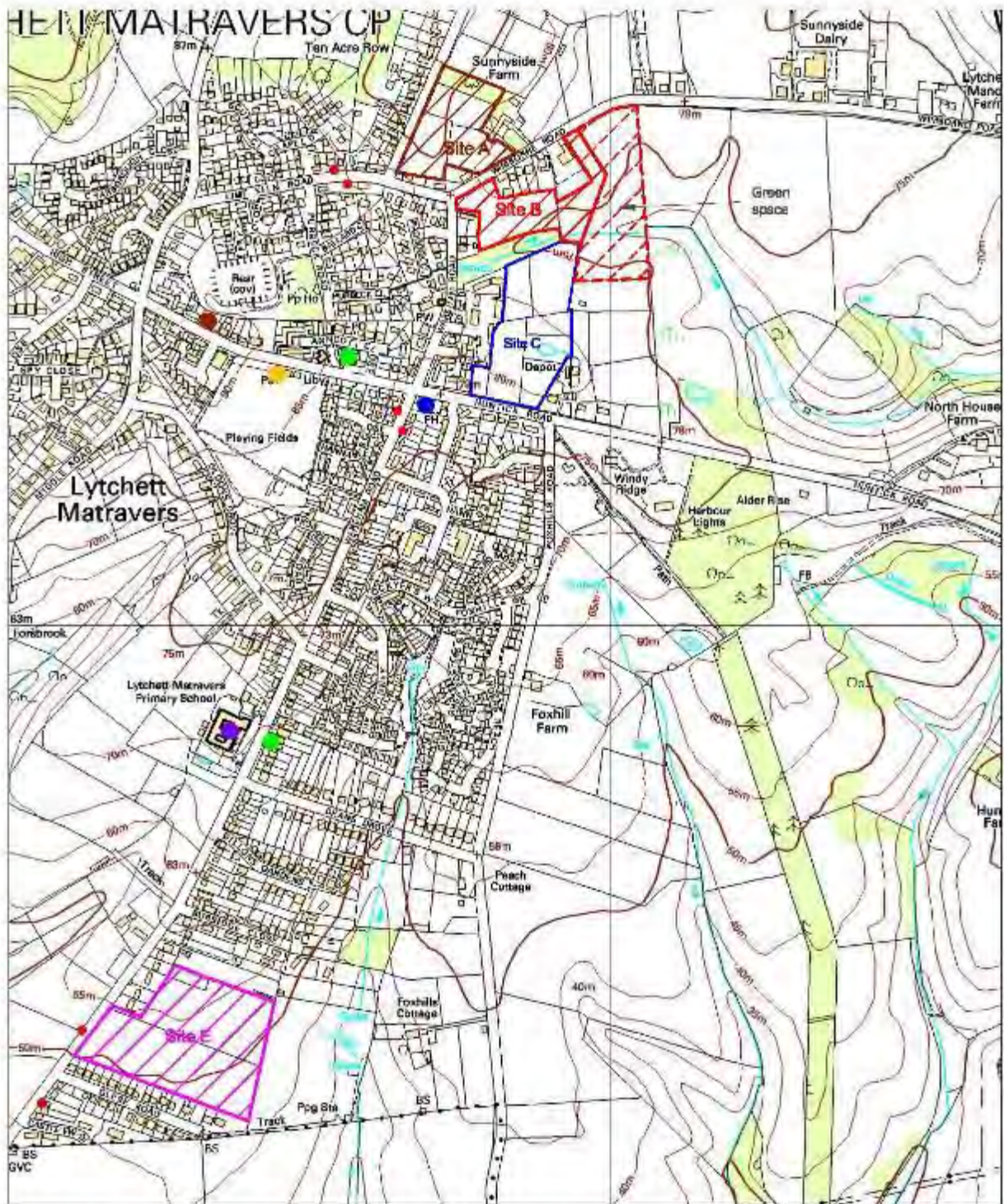


Southern Planning Practice
Figure A

Site E - Land at Wareham Road, Lychett Matravers



Southern Planning Practice
Figure E



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LOCATION PLAN
 Not To Scale

FIGURE 1



C.G. FRY & SON
 BUILDERS

In harmony with our heritage

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Purbeck Core Strategy: Pre Submission Draft

Representations by Southern Planning Practice Ltd on behalf of C G Fry Limited

Policy HS: Housing Land Supply

Please note that these representations should be read alongside the representations submitted to Policy NE: North East Purbeck as the issues relating to both policies overlap.

Objection is raised to this policy on the grounds that it is not sound; it is not based on evidence and does not conform with government guidance.

The basis of making provision for 2,400 dwellings is not properly explained and justified by evidence.

The figure of 2,400 dwellings appears to be derived from the draft South West Regional Spatial Strategy (RSS). In the draft RSS, the figure for Purbeck was in fact 5150, including provision for a settlement extension of 2750 dwellings at Lytchett Minster. The draft RSS reached the stage of representations being considered to the Secretary of State's proposed Modifications following the Examination in Public. However, it has never been formally adopted and in the light of government announcements and the publication of the Localism Bill in December 2010, there appears to be no scope for this Plan to become adopted prior to the proposed abolition of regional plans. As a result its current status is at best uncertain but it is argued that very limited weight if any should be accorded to it.

It is appreciated that the Council like others faces uncertainty because of the changes to the planning system, but that cannot be an excuse or an explanation for relying on the former draft RSS in part and now seeking to ignore it in others.

Setting aside the draft RSS, there is no other sound justification put forward for promoting a figure of 2,400.

The policy indicates that 'provision will be made for 2,400 dwellings to meet housing needs over the Plan period 2006 -2026'. However in its evidence base the Council clearly acknowledges that this level of provision will not meet its housing needs over the period:

Volume 5: Housing Supply: Paragraph 5.4 accepts that the figure of 2,400 is below the ONS projection of 4,000 dwellings and that it will not meet the need for 1660 affordable dwellings assessed through evidence.

The figure of 4,000 comes from more up to date evidence (2009) on household projections and needs to be considered in depth. The need to address affordable housing needs across the district is identified as a key challenge and issue throughout the Core Strategy. The following identify just some of the key examples:



- The main Challenges facing Purbeck are listed at paragraph 3.1 of the Core Strategy and include as the first point *providing housing that people can afford*.
- The Spatial Objectives at paragraph 4.3.1 of the Core Strategy include *meet Purbeck's housing needs*.
- At paragraph 6.1.1 of the Core Strategy the text indicates that the Council has a *critical* need to deliver affordable housing in the district with 1660 households currently on the waiting list.

However, it is clear that with a proposed figure of 2,400 the Council is neither going to meet its overall housing requirements or meet its affordable housing need.

The Council contends that this figure of 2,400 cannot be increased because of potential impact on the protected habitats, but this case has not been proven in evidence and the report by Footprint Ecology is inconclusive. Furthermore it only assesses a limited number of scenarios rather than looking at incremental increases in growth across the district.

In its response to the Preferred Options Consultation GOSW advised Purbeck that it needed to explore the extent to which it could increase its housing figures, even in the event that it did not pursue the proposed settlement extension of 2,750 at Lytchett Matravers. This guidance was picked up by the Planning Inspector in its advisory visit in February 2010. The Council has not pursued this guidance in any meaningful way.

In the Preferred Options Draft in 2009 the housing supply figure was presented as a minimum but now changed to a precise, absolute figure. The 2,400 is now presented as an absolute figure and the attempt has been to show provision for precisely that number of dwellings. This is an unsound approach and contrary to government policy.

The guidance in PPS3 makes several references to the need to ensure a flexible, responsive supply of land in preparing development plans – the approach being promoted by the Council and in particular its provision of an absolute figure and provision to meet precisely that figures does not accord with this guidance.

Furthermore, there is no flexibility built into the process to be able to respond to changing circumstances. There is serious concern that if one or more of the development sites do not come forward, or do not come forward in the indicated timescale, then that the housing provision could fall well short of this figure. There are no provisions built in to meet unexpected changes to the very narrow policy approach. This is unsound.

The policy also appears to rely on provision from Character Area Potential figures from year 1 onwards. Character Area Potential is however simply an alternative name for windfalls. Indeed the Purbeck District Council Viability Report: Update Study of October 2010 undertaken by Three Dragons at paragraph 1.2.7 uses the term 'windfalls' when referring to what Purbeck District Council refer to as Character Area Potential.



PPS3 makes clear at paragraph 59 that windfalls should not be included for the first 10 years, *unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified*. The Local Planning Authority does not have this robust evidence; indeed its justification for using 'windfalls' appears to be solely that windfalls have provided a significant amount of development in the past. This does not equate to *genuine local circumstances that prevent specific sites being identified*.

Furthermore, and notwithstanding the above, there appears to have been no reappraisal of the potential for windfalls in the individual settlements following the revisions to PPS3 in June 2010 which

- a) Removes gardens from the definition of previously developed land (Annex B).
- b) Removes the guidance seeking a minimum density of 30 dwellings per hectare (paragraph 47).

Whilst it is accepted that these changes would not necessarily prevent garden land from coming forward, it indicates a change in presumption and stricter tests to be applied. There may well be a significant reduction in the available land to come forward from within existing settlements, particularly the villages, where the primary source of windfalls will be from the sub division of garden land.

The settlement extension figures appear to be primarily derived by a 'what's left over' formula rather than positive planning for what might be appropriate and necessary for each settlement to secure greater sustainability and environmental improvements. Taking Lytchett Matravers for example, there is no explanation or evidence provided to result in a proposed settlement extension of 50 only. Indeed the evidence base indicates that Lytchett Matravers should be supported to become more self-sufficient and sustainable, yet the allocation of only 50 dwellings cannot be regarded as a realistic step towards achieving this objective. Please see representations submitted to Policy NE: North East Purbeck which should be read alongside these representations to Policy HS.

For all these reasons the objection is raised to the Policy on the grounds that it is unsound.

Changes sought:

- Review of overall provision of dwellings to consider what minimum number can be provided to secure the stated objectives.
- Removal of reliance on character area potential figures, particularly for the first 10 years.
- More detailed assessment of potential of individual settlements to accommodate further development, and in particular to increase the number of dwellings to be provided by way of settlement extensions at Lytchett Matravers (from 50 to 100, 150 or 200).

LJE/17/12/2010



Purbeck Core Strategy: Pre Submission Draft

Representations by Southern Planning Practice Ltd on behalf of C G Fry Limited

Policy NE: North East Purbeck

Please note that these representations should be read alongside the representations submitted to Policy HS: Housing Land Supply as the issues relating to both policies overlap.

Objections to Policy NE Purbeck also raise consequential objections to Map 12 (Settlement Extension to Lytchett Matravers) and the Proposals Map including the Inset Map for Lytchett Matravers, as well as to the supporting text at Section 7.4

A. Housing Numbers and Role of Lytchett Matravers

Policy NE refers to the housing supply needs being 580 dwellings over the period 2006 to 2026. This figure is questioned and there is no sound planning evidence to support this figure for this sub area of the district or the way it is broken down resulting in a settlement extension of 50 dwellings at Lytchett Matravers.

The figure of 50 for a settlement extension at Lytchett Matravers first appeared in the 2009 Preferred Options Stage to which objection was raised. No sound justification has since been provided as to why a figure of 50 dwellings is based on sound evidence and will meet the needs of the settlement and the district.

The Core Strategy was developed against the framework of the draft South West Regional Spatial Strategy which included a hierarchy of settlements. On that basis, Lytchett Matravers was designated as a Key Service Village. This appeared, in the opinion of the Council, to limit the scale of development that could be properly promoted at Lytchett Matravers but there has never been a proper explanation of how the settlement extension of 50 dwellings was derived.

The Core Strategy Spatial Options Background Paper Volume 4: Development Options reviewed a range of options spreading development across the District but a fundamental basis for the assessment of each option related to whether it would meet the RSS settlement hierarchy. The option of promoting more development at Lytchett Matravers, for example, was found to have a number of benefits but a principal reason for not pursuing it was because it would not conform to the Draft RSS settlement hierarchy.

The draft RSS reached the stage of representations being considered to the Secretary of State's proposed Modifications following the Examination in Public. However, it has never been formally adopted and in the light of government announcements and the publication of the Localism Bill in December 2010, there appears to be no scope for this Plan to become adopted prior to the proposed abolition of regional plans. As a result its current status is at best uncertain but it is argued that very limited weight if any should be accorded to it.



The options for development need to be revisited to consider afresh which options would best benefit the overall district and individual settlements without being constrained by the RSS. Continuing with a strategy which is derived from the draft Regional Strategy is not sound or sensible and does not meet the objective of ensuring that planning solutions are tailored to meeting local needs.

There needs to be more consideration given to the function, capacity and needs of Lytchett Matravers and the contribution that it can make to meeting the housing needs of the district. The policy as drafted is not effective and is therefore unsound.

The policy refers to *The role of Lytchett Matravers will be supported through...*

The first issue to address is what is the intended role of Lytchett Matravers. Policy LD identifies Lytchett Matravers as a Key Service Village – these are defined as the villages with the highest level of services and population which should be the focus for development.

The vision for North East Purbeck under paragraph 7.4.6 indicates that Lytchett Matravers will act as a focal point for smaller settlements nearby and will develop its role to provide facilities for everyday needs.

Volume 10 of the Evidence base on Settlement Strategy recognises that for its population size the village of Lytchett Matravers is under provided in terms of services and facilities.

B Constraints and limitations of current policy proposal to promote one settlement extension of 50 dwellings

However, the improvement of the role of Lytchett Matravers is proposed to be secured primarily through the benefits arising from one settlement extension of 50 dwellings at Huntinck Road. This one development is to fund:

- a) 50% affordable housing (25 units)
- b) new public open space
- c) new public right of way
- d) provide improvements to walking cycling and public transport access to the site
- e) a contribution towards enhancement works to the High Street
- f) contributions for transport and open space/recreation provision
- g) possible relocation of the health centre.

It is questioned how this one development of 25 market houses can be expected to make a meaningful contribution to improving the role of Lytchett Matravers as a service village.

It is questioned whether this one development could afford to secure 50% affordable housing as well as meet other infrastructure requirements, let alone start to contribute towards improving the role of Lytchett Matravers as a service village. In this regard reference should also please be made



to the attached report by C G Fry and Son's Ltd entitled: Comments on the Purbeck District Council Viability Report Update Study October 2010 which is submitted as part of these representations.

It is therefore contended that the policy is entirely arbitrary, will not meet the stated objectives and is not sound having regard to the evidence:

- a) it will not make an adequate contribution to meeting the overall housing needs of the district
- b) it will not make an adequate contribution to meeting the overall affordable housing needs of the district
- c) it will not make a meaningful contribution to strengthening and improving the role of Lytchett Matravers as a service village
- d) it will not make a meaningful contribution to strengthening and improving the sustainability of Lytchett Matravers.

The policy is ineffective and therefore unsound.

C. Proposed Additional Development Sites

It is strongly contended that additional land can and should be promoted at Lytchett Matravers for two sound planning reasons:

- a) to help meet the overall housing, including affordable housing, needs of the District
- b) to help meet the specific needs of Lytchett Matravers.

The Council has, through its consultation of June 2010, and supporting evidence already demonstrated that there are further sites on the immediate edge of the settlement of Lytchett Matravers which are suitable for and could be brought forward for development without harm to other stated objectives. (see also Volume 6 of Evidence). These sites are:

- Site A: Land at Flowers Drive, Lytchett Matravers
- Site B: Land at Blaneys Corner, Wimborne Road, Lytchett Matravers
- Site C: Land at Wareham Road, Lytchett Matravers.

These sites are shown on Figure 1 (Laurence Rae Associates) and individually on Figures A, B and E.

The analysis undertaken by the Council as part of its 2010 consultation, including its analysis of green belt boundaries concluded for each of these sites:

- The release of these sites from the green belt would not harm green belt objectives. (please see below further discussion in respect of Site B)
- Each site was sustainable and secured overall a green traffic light.



In terms of suitability for development each of the sites ranked equally with the site which has been promoted (Site C).

Moreover the Council also considered as a feasible and realistic option increasing the settlement extensions to secure 100 additional dwellings, through the release of Sites B and C and promoted this as an Option in the June 2010 consultation.

D. Submitted Sustainability appraisal

The Council's Sustainability Appraisal submitted as part of the Core Strategy Pre-Submission draft has scored each of the sites the same as the site to be released Site C, with one exception and that is, in response to the Issue:

Help everyone access basic services, reduce the need to travel by car and encourage cycling walking and public transport. Site C scored a + in each category whereas Sites A B and E all scored an 'n' in each category. The distinction is artificial highly subjective and does not relate to evidence:

- In the traffic light evidence put forward for the June 2010 consultation Sites A and B were ranked the same as Site C with a green traffic light for accessibility
- Site E was marked with amber for accessibility but this was contested at the time. Notwithstanding this, Site E was marked overall with a green 'traffic light'.
- Since then further evidence has been prepared and now submitted to confirm the objections already submitted that Site E has excellent accessibility to a range of services and in some important respects (for example the primary school) is best placed. Please see the Transport report submitted as part of these representations by Laurence Rae Associates
- The Laurence Rae Associates report reconfirms that all the Sites – A, B and E are highly accessible and sustainable.

These assessments have all been on the basis of each individual site being released to secure a settlement extension of 50 dwellings. On these assessments, it is clear that there is no discernible difference between Site A, Site B, Site C and Site D.

E. Further growth of Lytchett Matravers

As stated above, the choice of the figure of 50 for an extension to Lytchett Matravers is entirely arbitrary and not based on evidence. The Council itself seemed satisfied that the village could accommodate the higher levels of growth when it consulted upon the prospect of 100 dwellings. It is accepted that the majority of respondents to the 2010 consultation did not want to see growth above 50 dwellings and that weight should be attached to these responses. However the weight of evidence strongly supports the argument that Lytchett Matravers has the capacity to accommodate a settlement extension of more than 50 dwellings, and indeed needs to accommodate further development in order to secure the following objectives:



- Contribute to the overall housing needs of Lytchett Matravers and help contribute towards the overall housing needs of the district.
- Contribute to the affordable housing needs of Lytchett Matravers and help contribute to the overall affordable housing needs of the district.
- Help to strengthen and improve the role of Lytchett Matravers as a Key Service Village
- Help to strengthen the sustainability of Lytchett Matravers.

In support of this objection reports have been commissioned from and form an integral part of these representations:

Laurence Rae Associates Ltd – this report looks at the accessibility, sustainability and highways impact of each of the three sites individually and cumulatively, concluding that there is no constraint to allocating, in addition to Site C, these additional sites either individually or combined on accessibility or highways grounds.

SLR Consulting – this report addresses the potential impact of the sites, both individually and cumulatively on the Dorset Heathlands. This report has been undertaken specifically because of the claims in the Core Strategy that the district cannot accommodate more development because of this issue. The report concludes that either individually or in combination, each and all of the sites could ensure that they would not harm the integrity of the Dorset Heathlands. This could be achieved in one of two ways; first to make contributions to a district (or wider) scheme for mitigation as emerging through the issue specific DPD or through the on site provision of a SANGS on the eastern part of Site B. The area shown would be sufficient area to make provision if all three sites were brought forward.

C G Fry Ltd: Comments on the Purbeck District Council Viability Report Update Study October 2010. This demonstrates the need to secure more development in order to achieve the stated objectives for Lytchett Matravers.

It is further contended that the prospects of securing greater sustainability for Lytchett Matravers can only be realised through the promotion of more development. This is addressed in the Laurence Rae report in respect of accessibility and is equally applicable in respect of the following:

- Additional residential development would enable much needed affordable housing to be brought forward.
- The new housing would be well located to benefit from and support the existing facilities.
- Further development would assist in making the settlement more sustainable by supporting and improving the existing facilities and services.
- New development could help facilitate additional services and facilities to strengthen the self containment of the settlement



- New development would bring with it further investment to bring forward environmental improvements throughout the settlement, but particularly to the village centre.

The Strategy needs a fundamental review and further development needs to be promoted to secure the objectives set out in the Core Strategy. Sites are available at Sites A, B and E in Lytchett Matravers and these representations have demonstrated that individually and cumulatively they can be brought forward without harm to any key planning issues.

G. Green Belt Review

In terms of the Green Belt position the Council has already concluded that the release of each of the three sites would not on their own harm green belt objectives. With regard to the green belt objectives set out in PPG2, this conclusion can equally be applied to the release of more than one of these sites.

Further consideration has been given to Site B where the Council's green belt assessment drew a line part way through the site to immediate east of the British Legion Hall. In terms of meeting green belt objectives it is argued that the precise position of the line is flexible as there are no strategic landmarks which would justify a precise line, and a new boundary can be re-enforced through planting and landscaping.

The proposed green belt boundary line shown on Figure B has been specifically drawn for the following reasons:

- Site C is likely to receive an allocation for a settlement extension of 50 dwellings.
- If Site B were also to come forward there would be potential benefit to make internal linkages between the two sites.
- A new access could be run from Wimborne Road through the eastern part of Site B into Site C and thus removing traffic from needing to go further into the village.
- Part of the objective for the settlement is to secure a circular network round the village. Linking Sites C and Site B would help to secure a more meaningful part of this network for the benefit of the wider community.
- Linking Site C and B would help to make greater use and contribution of any proposed open space for the benefit of the wider community.

A strong objection is therefore raised to the proposed revision to the Green Belt boundary which only makes provision for the development of Site C.

It has already been demonstrated that further development is required to meet the housing needs of the district and that Lytchett Matravers has additional sites which are suitable and available for helping to meet the Core Strategy objectives.



In any event and even if the housing numbers were to remain at 2,400 the proposed release from the green belt of only those sites being promoted for development is unsound and offers no flexibility to bring forward additional housing land. If some of the sites do not come forward for development as envisaged then the Council will have no flexibility to bring forward other alternative sites.

Guidance in PPG2 is clear that green belt boundaries should endure for the long term and for that reason great care needs to be undertaken in drawing the correct boundaries. Paragraph 2.8 of PPG2 provides firm guidance that is directly applicable to Purbeck District Council. It firmly advises against drawing the boundaries excessively tightly around built up areas because such boundaries may not be able to accommodate long term development and will devalue the concept of the green belt.

This guidance is even more relevant in this situation where it is argued that:

- a) Purbeck has underprovided development sites to meet its housing needs, and
- b) Notwithstanding the above, Purbeck has built in no flexibility for alternative sites to come forward in the event that allocated sites do not come forward or do not come forward in the proposed timescales set out in the draft Core Strategy.

The Policy is therefore not effective and does not comply with government guidance and is therefore unsound.

Conclusion

For the reasons set out above Policy NE is unsound as it relates to Lytchett Matravers. The Strategy needs a fundamental review and further development needs to be promoted to secure the objectives set out in the Core Strategy. Sites are available at Sites A, B and E in Lytchett Matravers and these representations have demonstrated that individually and cumulatively they can be brought forward without harm to any key planning issues.

Proposed changes:

In view of the evidence set out above showing that the choice of a figure of 50 dwellings for Lytchett Matravers is arbitrary and not soundly based in evidence, it is difficult to suggest an alternative wording for Policy NE. It is clear, however, that further consideration should be given to increasing the amount of development at Lytchett Matravers through settlement extensions to 100, 150 or 200 dwellings, both to assist the district as a whole as well as the needs and sustainability objectives of Lytchett Matravers. Site A and/or Site B and/or Site E should also be allocated for development, with consequential amendments to the green belt boundaries to accommodate these sites.

LJE 17/12/10



Purbeck Core Strategy: Pre Submission Draft

Representations by Southern Planning Practice Ltd on behalf of C G Fry Limited

Sustainability Appraisal: Appendix 10

Lytchett Matravers Site A:

The Sustainability appraisal for Site A is not agreed:

Issue: help everyone access basic services, reduce the need to travel by car and encourage cycling walking and public transport – short medium and long term shown to have neutral effect.

This is not accepted for the following reasons:

- a) In the June 2010 assessment of sites prepared by the Council this site was shown with a green traffic light against accessibility – the same as Site C. However in the SA, Site C in response to the same issue is shown to have positive effects in the short, medium and long term. Given the Council's conclusions as recently as June 2010, there is no basis to reach a different conclusion in the SA.
- b) The submitted report by Laurence Rae Associates to support the representations by C G Fry Ltd concludes that there is no material difference between the Sites A and C.

There is no basis for the effects drawn on this issue which should be positive in terms of the short medium and long term.

Proposed Change: the proposed effects should be reassessed to indicate positive in the short, medium and long term.



Purbeck Core Strategy: Pre Submission Draft

Representations by Southern Planning Practice Ltd on behalf of C G Fry Limited

Sustainability Appraisal: Appendix 10

Lytchett Matravers Site B:

The Sustainability appraisal for Site B is not agreed:

Issue: help everyone access basic services, reduce the need to travel by car and encourage cycling walking and public transport – short medium and long term shown to have neutral effect.

This is not accepted for the following reasons:

- a) In the June 2010 assessment of sites prepared by the Council this site was shown with a green traffic light against accessibility – the same as Site C. However in the SA, Site C in response to the same issue is shown to have positive effects in the short, medium and long term. Given the Council's conclusions as recently as June 2010, there is no basis to reach a different conclusion in the SA.
- b) The submitted report by Laurence Rae Associates to support the representations by C G Fry Ltd concludes that there is no material difference between the Sites B and C.

There is no basis for the effects drawn on this issue which should be positive in terms of the short medium and long term.

Proposed change: The results should be reassessed to show a positive effect in the short, medium and long term.

LJE/17/12/10



Purbeck Core Strategy: Pre Submission Draft

Representations by Southern Planning Practice Ltd on behalf of C G Fry Limited

**Policy SD: Sustainable Design
Paragraphs 8.15.1 - 8.15.5**

C G Fry & Son fully supports the principle of Policy SD and the LPA's desire to deliver new development that performs well in reducing carbon dioxide emissions to help address climate change issues. However, C G Fry objects to the bullet point of Policy SD that deals with a requirement to generate 10% of a development's needs from on-site renewables or low-carbon sources.

In kilter with C G Fry & Son's traditional approach to residential development, with a reputation built on craftsmanship and quality, the high environmental performance of new C G Fry homes is achieved through:

- Building to last, with a long building lifecycle; and
- Energy efficiency measures, including a high performance and thermally efficient building envelope, good air-tightness and highly efficient heating systems installed in individual properties.

Current decentralised and renewable energy technologies are rapidly evolving and being continually superseded by the next technology. Building to last to high environmental performance standards future-proofs the buildings and ensures that the problems and pitfalls of rapidly evolving technologies are avoided. These pitfalls include further research shedding doubt on the carbon credentials of the technology and issues surrounding maintenance and longer-term performance. Moreover, recent BRE research demonstrates that on-site renewables (or "eco-bling") does not assist in the meeting of low carbon targets as efficiently or effectively as two other measures; namely a high performance thermal building envelope and an efficient heating system. C G Fry & Son can readily demonstrate that, using the above approach, carbon dioxide emissions are reduced by at least 10% compared with 2006 Building Regulation standards, without the need for use of decentralised or renewable energy technologies.

In view of the success of this approach, C G Fry & Son strongly objects to the inflexible approach of bullet 5 of Policy SD, which requires the provision of decentralised or renewable/low carbon energy as part of all developments over 10 dwellings. Amended wording should recognise that the level of carbon dioxide reduction proposed can be achieved solely by energy efficiency measures, subject to a high overall development quality approach.

It is further questioned whether the first three bullet points in particular add to national policy particularly as already set out under PPS1 and PPS3 or repeat other proposed policies.



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**PURBECK DISTRICT COUNCIL
CORE STRATEGY PRE-SUBMISSION CONSULTATION
RESIDENTIAL DEVELOPMENT IN LYTCHETT MATRAVERS**

TRANSPORT STATEMENT

Report No. 21025/15/1/1
Dec 2010

LAURENCE RAE ASSOCIATES LTD
Consulting Engineers

52 Ridgeway Road, Long Ashton
Bristol BS41 9BS

Tel: 0127 539 1626
Fax: 0127 539 4978

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Figure 1 Site Location Plan

APPENDIX 1 – Census Data and Traffic Distribution Analysis

1.0 INTRODUCTION

- 1.1 Purbeck District Council (PDC) is currently seeking consultation responses to the site specific proposals for the Core Strategy Pre Submission Proposals. A public consultation held in the summer of 2010, identified four possible sites for future residential development in Lytchett Matravers between 2012 and 2026. The location of the prospective sites, identified as A,B,C and E is shown on Figure 1. During that consultation, the public identified site C with a development of 50 dwellings as their preferred option. PDC has now identified that site as the preferred development site for inclusion in the core strategy. The location of the site and the road names and features referred to are shown on Figure 1.
- 1.2 C G Fry & Son (CGF), builders has interests in sites A ,B and E. Whilst CGF acknowledges the public and the Council's preference for 50 dwellings located on site C, it is considered that Lytchett Matravers could sustain in the order of up to 200 dwellings. Thus an additional 50 dwellings could be located on each of sites A, B, C or E.
- 1.3 This submission considers the highway and transport aspects of the future development of each site in support of the planning case which is submitted by Southern Planning Ltd on behalf of C G Fry and Son.

2.0 SUSTAINABLE TRAVEL CHARACTERISTICS

- 2.1 Manual for Streets identifies the walkable neighbourhood as being characterised by having a range of facilities within 800m of residential areas. The key local travel generators within Lytchett Matravers are identified on Figure 1. The difference in walking distance between sites A, B and C and the local facilities varies by distances in the order of 50m – 100m ranging between 450m and 530m for site A. However, the centre of site A is closest to a bus stop and the centre of site C is furthest from public transport access ranging between 260m and 370m. There is an established footway network between sites A and B and the village centre. Given the proximity of each of the sites to the key local facilities in the village centre the scale of difference in walking distance is not sufficient to affect modal choice between walking and using a car.
- 2.2 Site E located off Wareham Road at the southern part of the settlement is located approximately 650m from the primary school, a significant local travel generator. This is closer than any of the other sites which are in the order of 950m to 1.05km away. There is a local butcher and general store located in the order of 650m from site E and the nearest bus stop is within 180m of the centre of the site. Within the definition of the walkable neighbourhood there are thus a range of facilities within 800m of the site. Other village facilities are located 1.3km away. PPG13 defines journeys of up to 2km as being those where walking provides a viable alternative to the car. Cycling is

considered to be a viable form of transport for local journeys up to 5km. The village centre is on the route of the bus and therefore is accessible by public transport from site E.

- 2.3 The number 347 and 387 bus services, operated by Damory Coaches, travel along Wimborne Road, the High Street and Wareham Road at broadly 1 hour intervals on weekdays and Saturdays. These services provide a link between Lytchett Matravers and Poole which is a key local centre for employment and shopping with a journey time of 30minutes. The Poole bound service operates between 07:40 and 16:35 and the Lytchett Matravers bound service runs between 09:35 and 17:35. The 387 service also provides a link to Dorchester with a journey time of 50 minutes. The X8 Blandford to Poole service operated by Wilts and Dorset provides a Saturday evening service between Poole and Lytchett between 20:00 and 23:30 and Sunday service between 10:12 and 16:40 at two hourly intervals.
- 2.4 Whilst the quality of the bus service to Lytchett Matravers from the main local centre of Poole would be improved by increasing the frequency and extent of journey's, the bus does cater for peak hour employment trips to and from Poole and is also a viable means of travel for leisure and shopping trips. Dorset County Council has indicated that there are no current plans to increase the frequency of these services thus maintaining a good passenger base and the resultant increase in fare revenue is essential in ensuring the continued viability of the service for the whole community.
- 2.5 Considering the proximity of each of the sites to key local facilities, it is considered that when overall sustainability attributes are considered each of the sites has positive qualities and thus establishing a preferred site on the basis of comparative sustainable travel factors is not a robust determinant.

3.0 SITE ACCESS

- 3.1 The principal vehicular link between the proposed northern village expansion sites and the external highway network is via Wimborne Road and the A350. Journeys to Poole are also signposted via Huntick Road although this route tends to take longer and is consequently less attractive. Sites A and B each have a frontage onto Wimborne Road. Thus each of these sites could provide a vehicular access which would avoid attracting additional traffic into the village centre via the section of Wareham Road between Huntick Road and Wimborne Road. This section of Wareham Road has a width of 5.5m. On the east side there is no footway and a number of properties with a frontage and direct vehicle access on to the road. Minimising the number of vehicles attracted into the existing village road network by new residential development would benefit the road safety and amenity of existing residents.

Route	No of Dwellings			
	50	100	150	200
	Peak Hr Trips	Peak Hr Trips	Peak Hr Trips	Peak Hr Trips
A350 North	2	5	7	10
A350 South	20	40	60	80
A35 East*	8	16	25	33
A35 West*	3	5	8	10

*East or west of the A350 junction

TABLE 1
 INDICATION OF SCALE OF PEAK HOUR VEHICLE TRIPS
 ON THE WIDER ROAD NETWORK

- 4.4 Table 1 indicates that even without any travel plan initiatives the likely additional peak hour traffic from an additional 200 dwellings travelling on the A35 trunk road east of the site would be in the order of 33 vehicles or one vehicle every 2 minutes. This level of additional traffic would have an imperceptible effect on the operation of the trunk road. The additional traffic from 200 dwellings on the A350 south would be just over one vehicle per minute, which again is unlikely to have a material effect on the peak hour operation of the road.

5.0 IMPROVEMENTS TO TRAVEL SUSTAINABILITY

- 5.1 If not managed, the travel habits of residents on new developments are likely to reflect those of existing residents. Section 4 highlighted that a significant proportion of journeys of up to 5km were by car when these could be undertaken on foot up to 2 km and by bike up to 5km. In the order of 40% of employment trips have a destination in Poole. The existing bus service and car sharing could provide a viable alternative means of travel for people making these journeys. Increasing bus patronage would improve the viability of the existing services not only maintaining certainty of their continued provision but also possibly enabling an enhancement in frequency.
- 5.2 A residential travel plan provides the means of highlighting modes of travel other than the car for residents on each of the sites. An overall development strategy of incrementally allocating 50 dwellings on each of the sites, thus increasing the settlement by up to 200 dwellings would increasingly generate additional revenue to enable the provision and maintenance of a coordinated travel plan. This would 'kick start' and promote additional bus use and would facilitate car sharing using the Dorset County Council 'carsharedorset.com' initiative. Raising the profile of bus and car share travel on the development site would also have a spin off into the wider community in

encouraging other travellers to use alternative modes to the car. A travel plan would also encourage residents on the new developments to walk and cycle rather than use the car for short journeys under 2km. This would promote sustainable non car travel modes and improve the physical fitness of residents.

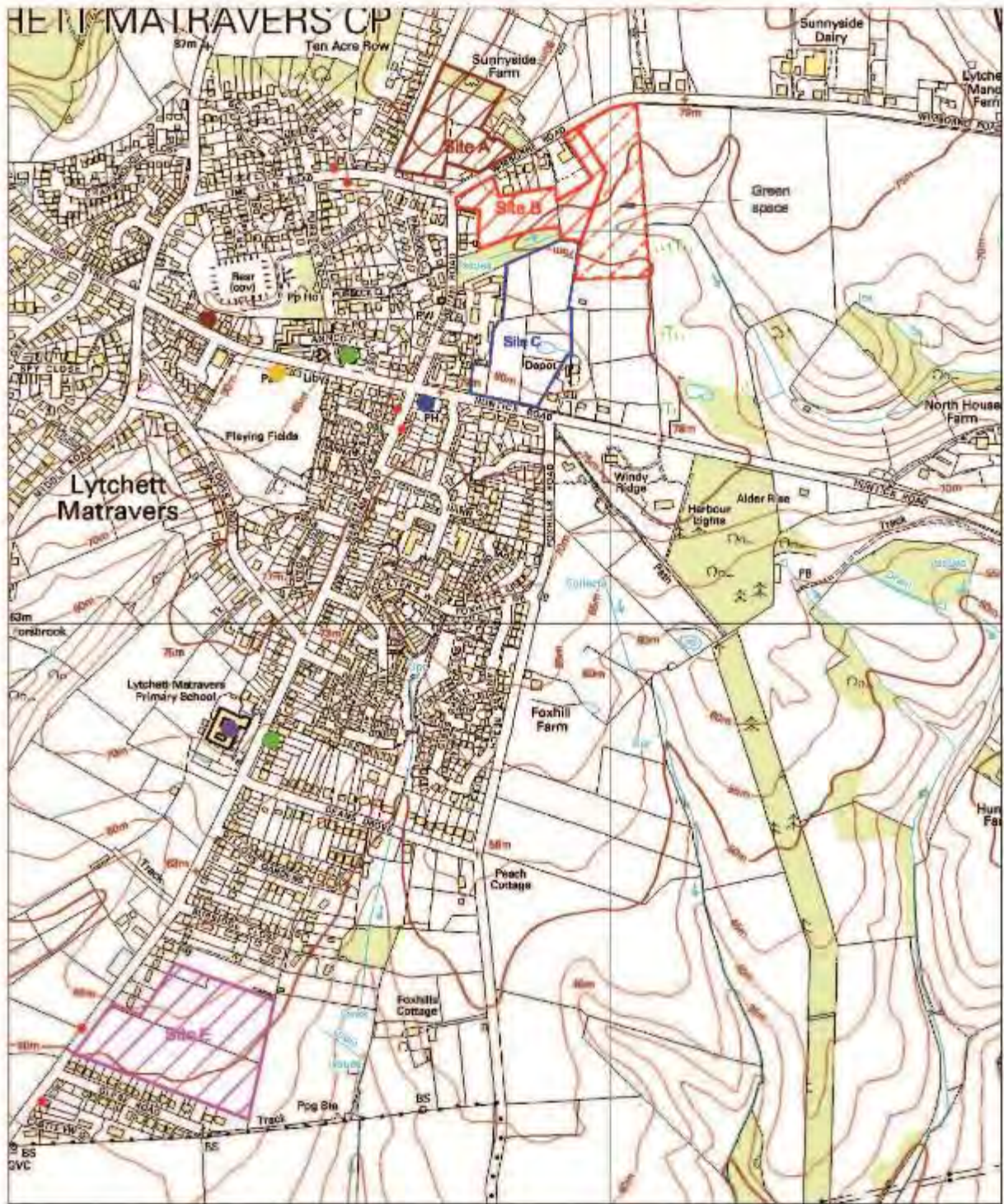
- 5.3 The introduction of travel plan initiatives would significantly reduce the number of peak hour trips particularly those travelling to nearby employment and services centres such as Poole and may also have some influence on creating a travel modal shift for existing residents in the community. It is unlikely that developing one of the sites with just 50 dwellings would generate sufficient revenue to fund the implementation and maintenance of a travel plan or any sustainable travel initiatives.
- 5.4 The Parish Council has an aspiration to enhance the High Street with traffic calming, new seating and paving. Such feature would enhance the experience of using local facilities and would assist in encouraging local people to walk or cycle for short journeys to the village centre. However it is anticipated that the funding for such a scheme would be generated from proposed additional residential development. Incrementally increasing the number of dwellings allocated within the community would proportionally increase the revenue available to implement the scheme.
- 5.5 Limiting the allocation of new residential development in Lytchett Matravers to 50 dwellings is unlikely to generate the level of revenue that would be required to finance the operation of a travel plan or any meaningful sustainable travel initiatives. Neither would there be sufficient funding to enable the implementation of the High Street improvement scheme. The net result would be that there would be a missed opportunity to affect modal shift within the community, the opportunity to improve the viability of the existing bus service would be missed and the opportunity to fund the High Street improvement scheme would also be missed.

6.0 CONCLUSIONS

- 6.1 From a transport perspective, each of sites A,B,C and E as identified in the Core Strategy pre-submission consultation are each located so as to enable sustainable travel by residents to key local travel generators. Each site is located within walking distance of the bus route. The difference in sustainable travel characteristics between each of the sites is not sufficient to determine a robust rank order between any of them.
- 6.2 Sites A, B and E are located such that vehicular access could be provided to residents without attracting additional traffic into the existing central village road network. Site B and site C could be linked to provide up to 100 dwellings in one development. This option would enable access into site

C without the need for vehicles to travel along the section of Wareham Road between Wimborne Road and Huntick Road.

- 6.3 Allocating only 50 dwellings in Lytchett Matravers would generate insufficient revenue to enable the implementation of a meaningful coordinated travel plan or sustainable travel initiatives. Increasing the allocation of housing from 50 to up to 200 dwellings would have a minimal effect on the peak hour performance of either the A350 or the A35. An increase in the number of dwellings would incrementally generate additional revenue to enable the provision and management of a coordinated residential travel plan covering all of the sites. Census data indicates that there is significant scope to create a significant travel modal shift in the community. The travel plan would promote such initiatives as bus travel and car sharing for longer journeys and walking and cycling for shorter local journeys. Increasing the number of dwellings would also generate additional revenue to assist in the provision of the High Street enhancement which would assist in making walking and cycling more attractive and benefit the whole community.
- 6.4 It is concluded that from a travel perspective any of the proposed sites would provide a suitable development option. The sustainable travel management on each site can be coordinated to create one comprehensive integrated travel plan. The greater the number of sites that are developed to provide up to 200 dwellings, the more effective will be the travel sustainability initiatives which can be implemented. The net impact on the wider road network of each development scenario would be minimal.



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LOCATION PLAN
 Not To Scale



FIGURE 1



C.G. FRY & SON
 BUILDERS

10 Salisbury Walk, Dorchester
 Dorset DT1 1JL
 Tel: 01306 32221 Fax: 01306 32222

- KEY**
- Bus Stop
 - Newsagents/Convenience store
 - Primary School
 - Public House
 - Local Leisure
 - Doctors Surgery

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PURBECK DISTRICT COUNCIL
 CORE STRATEGY PRE-SUBMISSION CONSULTATION - Dec 2010
 DISTRIBUTION OF PEAK HOUR TRAFFIC FROM NEW DWELLINGS - Lytchett Matravers

Journey Distance	Total Residents	Travel Mode for Existing Residents						
		Walk	Cycle	Motorbike	Bus	Train	Car	Passenger
< 2km	139	71	14				50	3
2 - 5km	113		13	8			86	6
5 - 10km	630			8	30		553	39
10 - 20km	414			8			380	26
20+km	265					11	237	17
Total	1561	71	27	24	30	11	1306	91

* Derived from 2001 census data

TABLE App 1-1 RESIDENTS EMPLOYMENT TRIPS BY DISTANCE AND MODE*

	Trip Rate	No of Dwellings			
		50	100	150	200
Arrive	0.14	7	14	21	28
Depart	0.56	28	56	84	112

** PM Trips Similar but arrival and departure reversed

TABLE App1-2 AM PEAK RESIDENTIAL VEHICLE TRIP GENERATION**

Journey Distance	Destination	Route	No of Dwellings				Prop of Peak Hr Employment Car Trips
			50	100	150	200	
			Peak Hr Trips	Peak Hr Trips	Peak Hr Trips	Peak Hr Trips	
< 2km	Local		1	2	3	4	3.83%
2 - 5km	Local		2	4	6	7	6.58%
5 - 10km	Poole	A350S	12	24	36	47	42.34%
10 - 20km	Wimborne	A350N	2	3	5	7	5.82%
	Blandford	A350N	1	2	2	3	2.91%
	Bournemouth	A350S +A35E**	6	11	17	23	20.37%
20+km	Soton	A350 S +A35E**	3	5	8	10	9.07%
	Dorchester	A35W**	3	5	8	10	9.07%
		Total	28	56	84	112	100.00%

** A35 East or West of A350 Junction

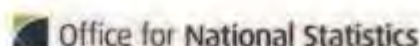
TABLE App 1-3 DISTRIBUTION OF PEAK HOUR CAR TRIPS FROM PROPOSED NEW DEVELOPMENT

Route	No of Dwellings			
	50	100	150	200
	Peak Hr Trips	Peak Hr Trips	Peak Hr Trips	Peak Hr Trips
A350N	2	5	7	10
A350S	20	40	60	80
A35E	8	16	25	33
A35W	3	5	8	10

TABLE App 1-4 ROUTE SELECTION BY CAR TRIPS FROM NEW DEVELOPMENT

APPENDIX 1

Neighbourhood Statistics



Original URL: <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?z=7&w=6178265&e=Lytchett+Matravers&d=14&e=16&f=61&g=436786&i=1001x1002x1004x1005&j=121&or=1&m=6&r=1&s=1291576946123&enc=1>

Distance Travelled to Work (UV35)

Period: Apr01

Area: Lytchett Matravers (Ward)

		Lytchett Matravers	Purbeck (Non-Metropolitan District)	South West	England
All People (Persons) ¹	Count	1,755	20,333	2,286,107	22,441,497
Works mainly at or from home (Persons) ²	Count	185	2,417	251,408	2,055,224
Less than 2km (Persons) ²	Count	139	4,493	551,046	4,484,082
2km to less than 5km (Persons) ²	Count	113	2,823	437,082	4,510,259
5km to less than 10km (Persons) ²	Count	630	3,001	356,251	4,094,614
10km to less than 20km (Persons) ²	Count	414	4,051	305,808	3,412,081
20km to less than 30km (Persons) ²	Count	70	1,059	99,215	1,197,605
30km to less than 40km (Persons) ²	Count	14	230	46,654	527,840
40km to less than 60km (Persons) ²	Count	32	247	41,099	487,683
60km and over (Persons) ²	Count	43	733	73,782	807,571
No fixed place of work (Persons) ²	Count	106	1,189	114,650	991,537
Working outside the UK (Persons) ²	Count	6	76	7,773	59,346
Working at offshore installation (Persons) ²	Count	3	14	1,339	13,655

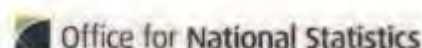
Last Updated: 18 November 2004
Source: Office for National Statistics

Notes

¹ National Statistics

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Neighbourhood Statistics



Original URL: <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?ao=7&am=6178255&cm=lytchett+matravers&d=14&e=16&f=63&g=436788&i=1001x1002x1004x1005&j=125&or=f&os=6&r=1&s=1291577031558&enc=1>

Method of Travel to Work - Resident Population (UV39)

Period: Apr01

Area: Lytchett Matravers (Ward)

		Lytchett Matravers	Purbeck (Non-Metropolitan District)	South West	England
All People (Persons) ¹	Count	2,592	31,637	3,534,458	35,532,091
Works mainly at or from home (Persons) ¹	Count	185	2,417	251,408	2,055,224
Underground, metro, light rail or tram (Persons) ¹	Count	3	17	1,916	709,386
Train (Persons) ¹	Count	8	334	21,171	950,023
Bus, minibus or coach (Persons) ¹	Count	30	351	115,568	1,685,361
Taxi or minicab (Persons) ¹	Count	3	59	6,867	116,503
Driving a car or van (Persons) ¹	Count	1,300	12,412	1,343,333	12,324,166
Passenger in a car or van (Persons) ¹	Count	91	1,237	143,882	1,370,685
Motorcycle, scooter or moped (Persons) ¹	Count	24	328	34,516	249,456
Bicycle (Persons) ¹	Count	27	713	76,430	634,588
On foot (Persons) ¹	Count	71	2,299	278,298	2,241,901
Other (Persons) ¹	Count	15	166	12,719	104,205
Not currently working (Persons) ¹	Count	835	11,304	1,248,350	13,090,593

Last Updated: 18 November 2004
Source: Office for National Statistics

Notes

¹ National Statistics

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C.G.FRY & SON
BUILDERS

**PURBECK CORE STRATEGY PRE-
SUBMISSION DRAFT 2010**

**COMMENTS ON THE PURBECK DISTRICT COUNCIL
VIABILITY REPORT UPDATE STUDY OCTOBER 2010**

**David Lohfink
Land & Planning Manager
C G Fry & Son Limited**

1.0 INTRODUCTION

- 1.1 CG Fry & Son Limited has interests in sites in Lytchett Matravers and has made wider representations on the Core Strategy Pre-Submission Draft through Southern Planning Practice. This paper should be read in conjunction with those wider representations.
- 1.2 CG Fry & Son Limited is a well-established and award-winning regional homebuilder with extensive experience in land acquisition, strategic site promotion and issues surrounding the negotiation of Option Agreements and landowner incentivisation. CG Fry has participated in a number of workshops in Dorset relating to the "Three Dragons Model" and made representations accordingly.
- 1.3 The Three Dragons Model is, essentially, a residual land value calculation which is, in itself, nothing new to the land and development industry. Like all residual land value calculations, it is only as good and robust as the assumptions that are plugged into it.
- 1.4 This paper will demonstrate that the Three Dragons Model (including the worked example at Appendix 2 of the Update Study Report) contains unrealistic assumptions in terms of:
 - Developers' return;
 - Contractors' return;
 - Market values (sales values); and
 - Build costs
- 1.5 This paper will also confirm that density calculations generally, and for Lytchett Matravers specifically (38dph), are over-

optimistic and not likely to be achieved having regard to a range of factors.

- 1.6 This paper will outline the relationship between "testable" or theoretical viability (having regard to existing or alternative use values) and landowner aspirations and incentivisation to bring land forward.
- 1.7 Lastly, it will be demonstrated how the above factors create a significant pincer movement on residual land value to the point that it falls to a level whereby either:
 - Landowners will be disincentivised to bring land forward; and/or
 - The range of anticipated community infrastructure improvements cannot be funded; and/or
 - The proportion of affordable housing must drop.
- 1.8 Reference will be made to comments made by the author of the Update Study Report (Dr Andrew Golland) in an article in Planning on 19th March 2010 and to the Inspector's Report on the Examination into the London Borough of Barking and Dagenham Core Strategy Development Plan Document. Both of these cast significant doubt on the residual land value calculation approach in development viability testing and the setting of affordable housing thresholds and policy.

2.0 THE THREE DRAGONS MODEL AS APPLIED TO PURBECK AND LYTCHELT MATRAVERS

- 2.1 As stated above, CG Fry has extensive experience of negotiating land acquisitions and often as part of this, Option Agreements. It is fair to say that CG Fry is well versed in what motivates landowners to bring forward land for residential and other development. Landowners, particularly farming

- landowners and country-estate landowners have many factors driving them beyond the "bottom line" residual land value.
- 2.2 This fundamentally underpins any viability testing analysis and goes somewhat beyond the rather crude assumption-driven residual land value calculation route. There is nearly always a difference between defined viability (whether it be 15% or 30% above existing/alternative use value) and a sufficient level of viability to incentivise a landowner to bring forward their land.
 - 2.3 This is recognized, in essence, by the LPA in the final sentence of Paragraph 2.1.6 of the Update Study Report where it is stated "*and provided that this margin is sufficient for the land owner to bring the site forward...*".
 - 2.4 Turning now to the Three Dragons Model as it has been applied generally, and specifically to Lytchett Matravers, such an approach to viability depends entirely on the level and robustness of a number of assumptions that are made. Section 4.0 below deals with the matter of whether or not residual valuation is a sound method for checking or testing viability.
 - 2.5 It clearly must be the case that the residual value of a scheme can fluctuate significantly based on assumptions made about, amongst other things, developers' returns, contractors' returns, market/sales values and build costs. In the case of the last two, it is commonly known that very significant fluctuations can result. This has effects on a range of matters including deliverables such as affordable housing and other community and infrastructure benefits.
 - 2.6 In the following paragraphs, it will be shown that the LPA underestimates developers' returns and contractors' returns, over-estimates market sales values and underestimates build costs. The outcome of this is an over-optimistic residual land value for a typical scheme.

- 2.7 In the case of Lytchett Matravers specifically, the Report assumes a net density of 38dph (Paragraph 4.4.1 refers). CG Fry would respectfully suggest that is too high based on the following:
- The general low density character of Lytchett Matravers;
 - The fact that a predominantly family housing-based approach to the site would be the best fit for the demographic character of the village;
 - Typical development densities in more rural (non-conurbation or large market town) parts of Dorset are relatively low; and
 - The Coalition Government has now expressly departed from the notion of setting minimum densities.
- 2.8 CG Fry is highly experienced in residential development throughout the south west typically in small to medium market towns and villages. CG Fry has rarely managed to achieve densities higher than the early 30s dph. Indeed, at Poundbury, where CG Fry has been developing since the urban expansion started, densities have rarely exceeded 32dph.
- 2.9 It is CG Fry's contention, therefore, that 38dph is too optimistic and 32dph would be a more appropriate assumption for Lytchett Matravers having regard to Paragraphs 2.7 and 2.8 above. This will also have an impact on residual land value per hectare.
- 2.10 The Update Study Report does test scenarios using a "baseline" position of a 15% developer profit margin and 20% profit margin and this is to be commended. However, it seems that a 15% margin is the preferred level. Although the residual value position with 20% margin is stated in the analysis, it is done more in terms of the increase in site value to the owner above, presumably, existing agricultural use value. In the case of

Lytchett Matravers (Paragraph 4.4.5 refers), it is stated this produces £1.10m per hectare residual value and that this is a 61 fold increase in site value. This residual value equates to around £450,000 per acre. No sensitivity testing with different contractors' margin, market/sales values and/or build costs was undertaken (or at least reported) so this figure will inevitably fall.

- 2.11 CG Fry contends that a 20% developer profit margin must be the level adopted as a "baseline" for assessment. There is no doubt that developer profit is a "key consideration" as the author of the Update Study Report put it in his article entitled "Gaining Ground" (Planning, 19th March 2010). A copy is attached hereto at Appendix 1.
- 2.12 Golland went on to state that, in "normal market conditions", this figure settled at "around" 15%. However, in the downturn, lenders have been more demanding with developers needing to show profits of "between 20 and 25 per cent".
- 2.13 This certainly chimes with CG Fry's experience as well as colleagues in the industry. Higher lender expectations have been with us for several years now and are likely to remain with us for the foreseeable future (and probably the next 5 to 7 years). Whilst the LPA might argue it should look long term, we will undoubtedly be well into the Plan Period before lender requirements ease, if at all. Given that Golland acknowledges lenders have demanded 20-25% returns, it seems to CG Fry that 15% is unjustifiably low and an unsound assumption. It would be considerably more likely, robust and meaningful to set 20% as a baseline.
- 2.14 Regarding contractors' profits, these have held steady, in CG Fry's experience, at around 7% and not the 6% in Three Dragons' worked example at their Appendix 2. At this point it is worth pointing out that CG Fry is a building contractor as well as

homebuilder and has been (and remains) engaged on a number of projects with Housing Associations.

2.15 It is considered that the market (sales) values assumed by Three Dragons in the modeling exercise and quoted in Appendix 3 of the Update Study Report are somewhat over-optimistic. In terms of Lytchett Matravers, this is probably due to the village being included in the "Purbeck rural fringe" category. Lytchett Matravers is not as attractive a village or place as some of the settlements included in the Purbeck rural fringe. Others have a better quality landscape setting and architectural quality (Briantspuddle, East Chaldon) or proximity to a station with good communication links (Moreton Station). Table 3.1 on Page 10 of the Report sets out the categories and settlements. Values in Lytchett Matravers will be below those for the remainder of the "Purbeck rural fringe".

2.16 CG Fry's analysis and experience suggests that the following sales values would be more likely in a village such as Lytchett Matravers:

4 – bed detached	£375,000
3 – bed detached	£300,000
4 – bed semi-detached	£275,000
3 – bed semi-detached	£250,000
2 – bed semi-detached	£230,000
4 – bed terraced	£265,000
3 – bed terraced	£240,000
2 – bed terraced	£205,000

2.17 It is important that a scenario is run with these figures.

2.18 Regarding build costs, this issue has been one of the hottest topics of discussion between Three Dragons and the landowning and development sectors at various workshops and seminars attended by CG Fry. It is fair to say there has been a consistent difference of opinion particularly when developing in

the more attractive parts of the south west. This difference almost certainly reflects the difference between a theoretical exercise based on build cost indices that are often averaged out over a wide range of different sites in different locations (the Three Dragons approach) versus the experience of developers working on specific sites in attractive areas subject to a raft of landscape designations where LPAs have high design and materials standards.

- 2.19 CG Fry's main areas of operation are West Dorset and immediately adjoining Districts such as Purbeck. It is certainly the case that build costs are higher because of the lack of economies of scale (developments are generally smaller) and enhanced expectations in respect of design and materials (high quality vernacular materials including local natural stone and high quality boundary treatments and hard surfacing materials).
- 2.20 In CG Fry's experience, build costs of something in the order of £1150 to £1200 per square metre are not untypical in West Dorset and Purbeck. The working example in Appendix 2 of the Update Study Report has build costs of £960 to £996 for dwellings.
- 2.21 The results of a re-worked example (based on the LPA's worked example with amended assumptions) are discussed in Chapter 3.0 below. It will be demonstrated that the residual land value is considerably lower and that this sheds considerable doubt on the soundness of the LPA's approach, the levels of affordable housing that are viable and the community benefits that might accrue.
- 2.22 Other matters to consider when looking at assumptions made in the LPA's modeling approach include the level at which planning obligations are set. The LPA benchmarks this at £10,000 per dwelling and also looks at a scenario of £15,000

per dwelling. CG Fry would respectfully suggest that £10,000 per dwelling is too low generally.

- 2.23 The LPA already has tariff-based approaches to collecting obligations related to transport and heathland mitigation and these typically amount to around £8,300 to £9,300 per dwelling. It is therefore clear that once a range of other planning obligations are added, including open space, sport and leisure contributions, education contributions, travel planning measures, other wildlife mitigation, footpath links and (in the case of Lytchett Matravers) public realm improvements, the "per dwelling" approximate figure is more likely to be £15,000 and very probably more. Any baseline assessment should therefore explicitly be carried out with this higher figure.

3.0 WORKED EXAMPLE OF THE THREE DRAGONS MODEL FOR LYTCHETT MATRAVERS

- 3.1 As stated above, the LPAs assumptions on site density, developer profit margin, contractor margin, market/sale values, build costs and Section 106 planning obligations are not considered to be sound and significantly overplay the likely residual land value of both a given (Lytchett Matravers) scheme and a notional (Appendix 2 worked example) scheme.
- 3.2 To illustrate these points and their impact, CG Fry has run a worked example inputting the revised assumptions above; namely:
- A net density of 32dph;
 - A developer margin of 20%;
 - A contractor margin of 7%;
 - Market / sales values as set out in paragraph 2.16 above;

- A build cost of £1,200 (a typical West Dorset /Purbeck type cost); and
 - Planning obligations of £15,000 per dwelling
- 3.3 It should be said that the Purbeck variant of the Three Dragons Model is not available to CG Fry so the worked example uses the West Dorset District model. Discrepancies are overcome by ensuring that the inputs match, wherever possible, the inputs in the LPA's worked example (except, of course, where assumptions have been deliberately amended as set out above).
- 3.4 The version available to CG Fry does not permit printing, including in the format used by the LPA in Appendix 2 of its Report. However, an electronic version can be made available upon request to cross-check inputs and assumptions. The house type and size mix is broadly similar to the "lower density" mix set out in Paragraph 3.2.1 of the LPA's Report as is as follows:

House Type	Quantity	Size (market) in sq m	Size (affordable) in sq m	%
2 bed semi-detached	7	76	76	14%
3 bed semi-detached	8	91	105	16%
3 bed semi-detached	15	91	105	30%
4 bed semi-detached	20	126	120	40%

- 3.5 The worked example produced the following key results:

Total scheme revenue: £11,080,000
 Total scheme costs: £10,526,000
Residual Value: £356,000 per ha

- 3.6 It is clearly the case that the LPA's residual land value modeling exercise is highly sensitive to changes in inputs and assumptions. It is also clearly the case that inputting more realistic assumptions based on local industry and market knowledge has a significant impact on residual land value bringing down, in this scenario, to £356,000 per hectare (only £144,000 per acre).
- 3.7 CG Fry would accept that £356,000 per hectare still represents an increase above existing use value (assuming agricultural value for a greenfield site). However, in CG Fry's considerable local and regional experience, it is highly questionable whether this is a sufficient incentive to landowners to bring land forwards. CG Fry has experience of seeking exercise Option Agreements and negotiating land acquisition at this level and above (including at around £200,000 per acre, £500,000 per hectare) and it is fair to say that the majority of landowners are simply not sufficiently incentivised.
- 3.8 Landowners, particularly owners of urban / village fringe greenfield sites, tend to be farming or estate-type landowners and have a number of considerations in mind. These include the tax regime (especially Capital Gains Tax), the impact of development on the local community, historical higher land values and the prospect of retaining the land in the event the situation changes.
- 3.9 The above worked example, based on more locally-derived assumptions and inputs based on local knowledge and experience shed considerable doubt on the LPA's approach to viability testing and its conclusion that a 50% affordable housing target is deliverable in Lytchett Matravers.

- 3.10 In the following Chapter, two opinions shedding doubt on the residual land valuation model as a viability testing methodology (and therefore an evidence base to underpin affordable housing policy choices) are referred to.
- 3.11 However, in the event that the Inspector is convinced that the Three Dragons Model is sound but that the LPA's assumptions are not reasonable, it must follow that an increase in the allocation of dwellings for Lytchett Matravers from 50 to 100, 150 or 200 will create economies of scale and capture enough planning obligations whilst reducing the "per dwelling" take. Moreover, it would be the case that the same number of affordable dwellings could be delivered as a lower percentage of a larger development thus improving overall scheme viability. It would also be the case that, for example, a 100-dwelling scheme could deliver more affordable dwellings at a lower percentage whilst improving scheme viability. For example, 30 dwellings at 30% or 35 dwellings at 35%.

4.0 THE APPROPRIATENESS OF USING THE THREE DRAGONS MODEL

- 4.1 As stated above, there is a school of thought that residual land valuation has problems as a method of checking viability and therefore setting affordable housing policy. This further illustrates the great care with which the Three Dragons Model should be applied, if at all, and the care that must be taken to ensure the soundness of the assumptions made.
- 4.2 It is noteworthy that the author of the LPA's Viability Report Update Study is Dr Andrew Golland of Three Dragons. Dr Golland also wrote a paper entitled "Gaining Ground" that appeared in Planning on 19th March 2010. A copy is attached hereto at Appendix 1.

- 4.3 In this paper, he sets out his views on the problems and pitfalls associated with a residual land valuation approach and the difficulties surrounding assumptions inputs and the definition of viability. He states that none of the main methods for testing viability is without problems but "the uplift approach has most to commend it".
- 4.4 The use of the residual land valuation model and the problems of subsequently establishing a definition of viability relative to an existing / alternative use value were matters considered by the Inspector appointed to examine the Barking and Dagenham Core Strategy DPD. The relevant paragraphs from his Report dated 22nd February 2010 are attached hereto at Appendix 2.
- 4.5 At Paragraph 6.8, the Inspector mentions specifically the suggested alternative "value uplift" approach of PINS appointed expert. He found sufficient doubt in the LPA's approach and the assumptions made to find the policy unsound and he deleted it.

5.0 CONCLUSIONS

- 5.1 The evidence set out above demonstrates that very significant care needs to be exercised if the Three Dragons Model (a residual land valuation exercise) is to be employed to test the viability of development proposals. Indeed, it may not be the most appropriate methodology.
- 5.2 The evidence above also demonstrates how crucial it is to ensure that soundly-based locally-informed inputs into the model are made as any residual land valuation exercise is highly sensitive to changes in those inputs.
- 5.3 It has been demonstrated that the LPA's assumptions are unsound in respect of developers' return, contractors' return, market values / sales values and build costs. It has been shown, with sound inputs, that the residual land value for a 50-

dwelling scheme in Lytchett Matravers is highly likely to be much lower than suggested by the LPA.

- 5.4 It has consequently been shown that there is likely to be insufficient land value to incentivise a typical rural landowner to bring land forwards for residential development and that the delivery of affordable housing and a suite of community benefits is threatened.
- 5.5 It has been shown that it would therefore follow that a larger allocation for Lytchett Matravers would ensure the delivery of the same number of affordable dwellings (albeit at a lower percentage target) whilst maintaining scheme viability and landowner incentivisation
- 5.6 The LPAs policy of seeking 50% affordable housing based on the Three Dragons Model and assumptions made in the Viability Report Update Study October 2010 should be found unsound.

APPENDIX 1: ARTICLE FROM PLANNING 19 MARCH 2010

Gaining ground

Andrew Golland, Planning, 19 March 2010



None of the main methods for checking development proposal viability against councils' planning gain terms is without problems but the uplift approach has most to commend it.

Development viability has increasingly become a planning issue in recent years. This is in no small measure due to paragraph 29 of PPS3, which urges local authorities to ensure that affordable housing policies do not make development unviable.

More recently, the credit crunch has raised questions about both the short-term economic viability of sites and the longer-term deliverability of affordable housing and section 106 policies.

But while planners and builders agree that viability is a key issue in resolving the challenges of housing development, how do they decide what is and what is not viable? A number of methods have been devised to answer this question.

Gross residual value (GRV) is the difference between scheme revenue and costs. Once section 106 costs have been subtracted, a net residual value (NRV) remains. For a scheme to proceed, the parties must have achieved their aims or agreed in some measure to compromise.

The three crucial parties are the developer seeking a reasonable profit margin, the council seeking to meet its section 106 policy requirements and the landowner, who also seeks a return.

Viability cannot be assessed by reference to developers' margins alone. Indeed, the focus in negotiations and the development of core strategies is on how local authorities and developers can make sense of the NRV generated by a scheme.

Yet developer profit is a key consideration. In normal market conditions, this figure settled at around 15 per cent of gross development value (GDV). In the credit crunch, lenders have been more demanding, with developers needing to show profits of between 20 and 25 per cent.

Whether local authorities accept these higher margins will depend on whether they are looking at long-term policy or short-term site negotiation considerations. For the purposes of calculating section 106 terms, profit on development value or cost are the most workable factors.

Developers' internal rates of return are also used but these vary considerably and are arguably too specific to provide a reliable basis for assessment.

offset gains against potential liabilities. Local authorities are in a difficult position here, although some broad working figures are emerging.

For brownfield sites where an existing use - typically industrial or commercial - is concerned, negotiations seem to be based on a 30 per cent landowner uplift from existing or alternative use value. This is an average figure, however.

The owner of a plot which a developer is acquiring for redevelopment may take a very different view on return to the owner occupier of a business who might otherwise remain in situ for several years to come.

In most cases, a 30 per cent uplift is unlikely to encourage a farmer to sell greenfield land. This should not stop local authorities adopting a similar approach to all sites, although they are likely to come up against the objection that planning permission only increases site value from say £10,000 to £13,000 per hectare. Sites are unlikely to come forward on this basis, since farmers may well look at the selling prices of brownfield residential land when setting their expectations.

In practice, greenfield sites will deliver substantially higher uplifts even with very significant levels of affordable housing and other forms of section 106 benefits. But the precise figure at which landowners will choose to release land will be down to the individual.

Some local authorities will inevitably take a narrow view of viability on greenfield sites, negotiating on the basis that sites are viable as long as there is some uplift.

In an area where land supply and demand are fairly evenly balanced, the landowner's response is likely to be that the site will not come forward unless the value broadly matches those generated on brownfield sites above existing use value.

However, not all local authorities are in the same supply-demand situation. Those with few greenfield site options will inevitably need to adopt a more flexible negotiating position than those that can make it clear that if one landowner won't meet their section 106 requirements, they know another who will.

- Dr Andrew Golland is managing director of Three Dragons (AG) Ltd and leads its work on viability assessment.

KEY CONSIDERATIONS

Benchmark approach

- Clear approach driven by market standards.
- Only delivers enhanced section 106 gains in a rising market.
- Reflects historic and geographical relationships.

Sunk costs approach

- Uncertainty whether acquisition costs represent the market generally or a specific developer's requirements.
- Issues over which holding costs are valid and which simply reflect speculative development activity.

Betterment or uplift approach

- Most consistent with section 106 planning gain ethos.
- Section 106 costs passed transparently to landowners.
- Assumptions needed on reasonable rate of landowner return.

**APPENDIX 2: EXTRACTS FROM THE BARKING CORE STRATEGY
INSPECTOR'S REPORT**



Report to the London Borough of Barking and Dagenham

The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN
☎ 0117 372 8000

by **C J Anstey BA(Hons) DipTP
DipLA MRTPI**

an Inspector appointed by the Secretary of State
for Communities and Local Government

22 February 2010

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE LONDON BOROUGH OF BARKING AND DAGENHAM CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 11 June 2009

Examination hearings held between 24 November & 4 December 2009

File Ref: LDF000957

6 Creating a Sense of Community (Chapter 6)

Is Policy CC1: Affordable Housing justified and in accordance with national guidance and the London Plan?

- 6.1 Clearly on the basis of the material submitted, in particular the Council's Housing Needs Survey 2005, there is a need for a considerable amount of affordable housing within the LBBDD over the plan period. Notwithstanding this I consider that the CS is somewhat sparse on explaining and quantifying the level of need, relating this to the overall dwelling requirement for the Borough, and indicating the extent to which Policy CC1 will satisfy this need. In my view such shortcomings could be addressed by additional text and as a result do not constitute grounds for a finding of unsoundness. I am concerned, however about the overall target for affordable housing expressed in Policy CC1 and whether it is justified.
- 6.2 The Council in its original Policy CC1: Affordable Housing and its **PC 13** specify that the overall target for new affordable housing in the Borough over the plan period is 50% of the total new dwellings provided. This figure accords with the LP target.
- 6.3 PPS3 makes it clear that the target for the amount of affordable housing should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can be reasonably secured.
- 6.4 In view of this national guidance I advised the LBBDD during the CS examination that an economic viability assessment of its affordable housing targets was required. This was duly provided by the Council in the form of the AHEVA (produced by BNP Paribas Real Estate and Christopher Marsh & Co Ltd) and was then the subject of an independent review, the RAHEVA, by a specialist advisor (Mr N Jones, Chesterton Humberts) appointed by The Planning Inspectorate. Both documents were available for the discussion about affordable housing at the CS hearing held on 1 December 2009.
- 6.5 Clearly the assumptions that form the basis to the AHEVA have a significant impact on the overall affordable housing target that is considered to be achievable. One of the assumptions inherent in the AHEVA relates to the level of return to the landowner that is required to ensure a site is brought forward for housing development. The AHEVA assumes that when residual land value exceeds existing use value by 15% or more then landowners would have sufficient incentive to bring forward their sites for development.

- 6.6 I note that 15% may be the generally accepted benchmark in London. However in my view if the 15% figure is to be used as a key assumption in determining the overall affordable housing target in the LBBDD it must be based on recent and convincing evidence. In particular it would need to be demonstrated that across a range of sites in the Borough a 15% increase in value would provide the necessary incentive to landowners. Consequently I believe further work is required to this end. In the absence of such information I do not consider the AHEVA to be soundly based.
- 6.7 In reaching this view I am also mindful that it does not automatically follow that a 15% increase over existing use value would ensure that a site is brought forward for development. Existing use value is likely to vary from site to site because of site characteristics, such as existing use, the condition of the site and tenant arrangements. Consequently whilst a 15% increase may be an incentive on certain sites it may not be on others.
- 6.8 Given this I believe that as part of the additional work required it would be sensible to examine whether there are other viability assumptions that may better inform the overall target. An approach favoured by PIN's specialist advisor, which if adopted would need to be reflected in the policy, is that landowners would be encouraged to bring their land forward if the uplift in value created by a planning permission is shared between them and the Council before any affordable housing or Section 106 contribution is considered. If it were to be decided that this approach was justified an appropriate assumption could then be factored into the AHEVA model to establish the overall affordable housing target.
- 6.9 With regard to grant funding the AHEVA model was carried out on the basis of affordable housing grant of £23,000 per person for social rent and £12,500 per person for intermediate tenure. The 'no grant scenario' was not modelled. I understand that the normal convention with studies such as this is to model the development proposal on 'a without grant basis' followed by a consideration of the residual land value with housing grant. The reason for this is that it is impossible to be sure about the types and levels of grant that would exist in the future. Consequently at present the findings of the AHEVA are based on levels of grant funding that may be subject to change over the plan period. As a result it may not be possible to deliver the levels of affordable housing envisaged in the AHEVA. This adds to my concerns about the robustness of the AHEVA.
- 6.10 Even if the AHEVA, and all its inherent assumptions, are accepted as being sound I do not consider that it justifies the overall CS affordable housing target of 50% of the total new dwellings provided. In fact one of the key conclusions of the AHEVA is that whilst exceptionally 50% is achievable on sites with values that could be achieved up to 2025 under normal economic circumstances it is apparent that 35% is more readily attainable. As

a result the AHEVA recommends that this should be reflected in the policy. Although some wording changes are proposed to Policy CC1 by the Council the 50% overall target is retained and no mention is made of 35% or any other overall target figure

- 6.11 I recognise that the Council has had considerable success in achieving significant levels of affordable housing on sites in the recent past. I also appreciate that the proposed changes to Policy CC1 recognise that the 50% target on individual sites will be dependent on the economics of the particular scheme, including the availability of public finance, and will be the starting point for negotiations. However in my judgement the 50% overall affordable housing target is not justified by the evidence available and consequently may not be deliverable.
- 6.12 I note that the Council is concerned that if a lower overall affordable housing target is specified in the policy then this would limit what is achievable on those sites where 50% affordable housing is in fact economically viable. I do not believe that this would be the case if the policy wording drew a clear distinction between the overall housing target and what is achievable on particular sites.
- 6.13 In summary I find that the overall target for affordable housing in Policy CC1 is not justified on the basis of the evidence submitted. To add to my concerns there appears to be little evidence to support the 70% social rented and 30% intermediate split other than reference to the LP. In my view there needs to be some examination of the relative needs for social and intermediate housing in the Borough to underpin any such policy split.
- 6.14 I have given considerable thought to whether the CS examination should be extended or suspended to allow the necessary additional work and consultation to be carried out. However in my view the need for the Council to have a CS in place as soon as possible to address the considerable challenges facing the Borough is paramount. In addition any delay in progressing the CS would inevitably mean that the other plans already submitted for examination would be delayed with all the associated uncertainty that this entails.
- 6.15 Consequently I believe that the best way forward is to delete Policy CC1: Affordable Housing, together with the supporting text, from the CS. The Council would then be able to prepare a DPD specifically dealing with affordable housing, addressing all the identified problems. In the interim the LP affordable housing targets remain an important and relevant consideration in determining housing schemes.

Policy CC1: Affordable housing. Delete Policy CC1 and paragraphs 6.1.1 – 6.1.6.	
Changes required:	No relevant PCs