

# Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010  
Consultation Responses  
Part 4**



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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 (where relevant)
Title	MRS	
Name	LYNNE CASTLE	
Job Title (where relevant)		
Organisation (where relevant)		
Address	11, KINGSWOOD CLOSE SWANAGE, DORSET	
Postcode	BH19 2SP	
E-mail	edcastle47@hotmail.com	
Tel. Number	01929 423336	

**Responses should be sent to:**

**Email:** [ldf@purbeck-dc.gov.uk](mailto:ldf@purbeck-dc.gov.uk)  
**Post:** Planning Policy, FREEPOST RSAX-LTRK-TRKE, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP  
**Fax:** 01929 557348

**Return to Purbeck District Council by 4pm, Monday 20<sup>th</sup> December 2010**

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

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

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

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

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

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

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

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

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

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

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

Signature	Signature has been blanked out	Date 12 <sup>th</sup> Dec 2010
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**YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION**

Please select which document you are commenting on:

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

Policy:	Paragraph: 4.2-1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

**Comments:**

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

The proposal to build 900 dwellings in Swanage, increasing the population by some 1500 people, will not enhance or retain the "unique qualities" of the town. Most of the development in Purbeck over the last 15 years has fallen in Swanage. Over 30% of all new housing has been in the town. The Core Strategy proposes to continue this trend even though it is apparently not sustainable as there is only a very limited amount of employment in Swanage.

**Proposed Changes:**

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

Would it not be better to build the bulk of new housing in areas of economic growth, already identified as Weyforth and Hutton Heath.

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

Please select which document you are commenting on:

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

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

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

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

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

**Comments:**

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

The consultation was flawed, because it did not ask if people wanted 200 dwellings to be built on settlement extensions in Swanage. There was no option to choose fewer houses, nor was there an option to build none.

**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).

Do not build 200 houses on settlement extensions in Swanage



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Please select which document you are commenting on:

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

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

Policy :	Paragraph:	Map: 13
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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**Comments:**

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

There has been no consideration given to the high level of second homes in Swanage. Because of the number of these, house prices have risen considerably. Subsequently, property is unaffordable for many local people.

**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).

Ensure second home ownership is limited or restricted.

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

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

Please select which document you are commenting on:

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

Policy : E.L.5	Paragraph: 6.5	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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Less than 3% of employment land is in Swanage and less than 0.5% is in Corfe. That is less than 3.5% in South East Purbeck, where the proposal is to allocate 37.5% of housing provision. This seems to contradict the stated aim of reducing car usage which was a factor identified as a priority in the Purbeck Community Plan. It was also an aim stated in the Core Strategy. (ref paras 4.1.2/4.1.4 and 4.3.1 High number of new houses and lack of employment in the area is not sustainable.)

**Proposed Changes:**

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

Build new housing in the already identified areas of economic growth of Holton Heath and Winfrith.

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

Please select which document you are commenting on:

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

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

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

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**Comments:**

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

The policy is unsound. Allocation of 900 dwellings (37.5% of 2400) is not deliverable. The overwhelming majority (over 90%) would be in Swanage. The Planning Inspectorate Report in 2002, stated that no further development should happen in Purbeck until the traffic congestion has been resolved along the A351.

**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).

Any housing should be allocated nearer to the areas of economic growth, already identified as Holton Heath and Wimfrith,

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

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

Please select which document you are commenting on:

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

Policy : HS,	Paragraph: 6.3.4	Map: 13
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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**Comments:**

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Habitats Regulations Assessment (5.52) states that it is likely that any development in Swanage would have an adverse effect on protected habitats. The mitigation proposal for Sites of Alternative Natural Green Space is not deliverable in Swanage which is situated in an Area of Outstanding Natural Beauty and this should be protected forever as a priority, and not be lost.



**Proposed Changes:**

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Do not build on green field sites or on Areas of Outstanding Natural Beauty. Limit infill to affordable housing for local people.



# Charborough Estate



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

Policy LD

	<b>Your Details</b>	<b>Agents Details (where relevant)</b>
Title	The Charborough Estate	Pro Vision Planning & Design
Name	Jason Bowerman	Andrew Patrick
Job Title (where relevant)	Agent	Director
Organisation (where relevant)		
Address	The Estate Office, Charborough Park Wareham	The Market House, Corn Market, Wimborne
Postcode	BH 20 7 EN	BH 21 1 JL
E-mail	j.bowerman@charborough.co.uk	a.patrick@pvprojects.com
Tel. Number	01 258 857 204	01 202 84 04 05

**Responses should be sent to:**

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

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

**Fax:** 01929 557348

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

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

The Charborough Estate is a significant Stakeholder in Purbeck. Our input will assist the Inspector to identify whether or not the Core Strategy is sound

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

Signature	Signature has been blanked out	Date 13 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 : LD	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

**Comments:**

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

Please see enclosed representation on POLICY LD "OTHER VILLAGES"

**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 enclosed representation on POLICY LD "OTHER VILLAGES"



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

Section 6

	<b>Your Details</b>	<b>Agents Details (where relevant)</b>
Title	The Charborough Estate	Pro Vision Planning & Design
Name	Jason Bowerman	Andrew Patrick
Job Title (where relevant)	Agent	Director
Organisation (where relevant)		
Address	The Estate Office, Charborough Park Wareham	The Market House, Corn Market, Wimborne
Postcode	BH 20 7 EN	BH 21 1 JL
E-mail	j.bowerman@charborough.co.uk	a.patrick@pvprojects.com
Tel. Number	01 258 857 204	01 202 84 04 05

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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

The Charborough Estate is a significant Stakeholder in Purbeck. Our input will assist the Inspector to identify whether or not the Core Strategy is sound

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

Signature

Signature has been blanked out

Date 13 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: Section 6	Map:  
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

**Comments:**

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

Please see enclosed representation on HOUSING LAND SUPPLY

**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 enclosed representation on HOUSING LAND SUPPLY



*Policy HS*

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	<b>Your Details</b>	<b>Agents Details (where relevant)</b>
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Organisation <i>(where relevant)</i>		
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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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Signature

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Date 13 December 2010



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

Please select which document you are commenting on:

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

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

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

Please see enclosed representation on HOUSING LAND SUPPLY

**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 enclosed representation on HOUSING LAND SUPPLY



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

Policy CO

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Job Title (where relevant)	Agent	Director
Organisation (where relevant)		
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E-mail	j.bowerman@charborough.co.uk	a.patrick@pvprojects.com
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'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

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

**Proposed Changes:**

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Please see enclosed representation on POLICY CO "COUNTRYSIDE"



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

Section 7.3

<b>Your Details</b>	<b>Agents Details (where relevant)</b>	
Title	The Charborough Estate	Pro Vision Planning & Design
Name	Jason Bowerman	Andrew Patrick
Job Title (where relevant)	Agent	Director
Organisation (where relevant)		
Address	The Estate Office, Charborough Park Wareham	The Market House, Corn Market, Wimborne
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Please select which document you are commenting on:

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

Policy :  	Paragraph: Section 7.3	Map:  
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

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

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

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*(tick all that apply)*

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**Comments:**

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Please see enclosed representation on SECTION 7.3 & POLICY CEN "WAREHAM & SANDFORD"

**Proposed Changes:**

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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)

Policy CEN

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

Policy : CEN	Paragraph:	Map:
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**Proposed Changes:**

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



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

Policy TA

<b>Your Details</b>	<b>Agents Details (where relevant)</b>	
Title	The Charborough Estate	Pro Vision Planning & Design
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**Comments:**

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Please see enclosed representation on POLICY TA "TOURISM"

**Proposed Changes:**

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Please see enclosed representation on POLICY TA "TOURISM"



**PURBECK DISTRICT COUNCIL  
CORE STRATEGY:  
THE CONCERNS OF  
THE CHARBOROUGH ESTATE  
EXECUTIVE SUMMARY**

AJP/20227/10.12.1

Market House, Corn Market, Wimborne, Dorset BH21 1JL T: 01202 840405 F: 01202 840406 [www.pvprojects.com](http://www.pvprojects.com)

Chartered Town Planners and Architects

PV PROJECTS LTD UK Registered Office: 13 Millers Road, Chedlers Ford, Hants SO53 5DS Reg No. 3298321

1.

The Charborough Estate is concerned that the Core Strategy (Pre Submission Consultation) will fail to achieve the aims and aspirations of the local community in respect of:

- Affordable Housing
- Keeping small villages alive
- Conserving the special ecology of Purbeck
- Conserving the special landscape of Purbeck
- The best place for more homes at Wareham
- Providing more employment for Wareham, or
- Long term solutions to traffic on the A351, especially through Sandford

## 2. Affordable Housing

Our calculations show that the Core Strategy will not achieve enough affordable housing because:

- a) One third of the 2400 new homes already have planning permission, and most of these will not provide affordable homes, and
- b) Affordable housing on infill sites of two dwellings is unlikely to be viable, so such sites will either not come forward, or will be promoted for one dwelling only.

We are also concerned that new housing is likely to be split between social, rented and executive homes, with nothing in between, squeezing out the local young couples and families at the lower end of the open market.

3.

Therefore the Core Strategy needs to be changed to:

- Allow for more housing, either now or in the future, and
- Require a wide range of housing, especially at the lower end of the open market, for both purchase and market renting.

The Charborough Estate has land at Carey and Tantinoby (North West Wareham) available for more housing, or reservation as "white land" for future possible need.

## 4. Keeping Small Villages Alive

We are very encouraged by the fact that the Council wants to keep small villages alive, including those without defined development boundaries. However, the Charborough Estate is concerned that the wording of Policy LD fails to adequately reflect the aims and aspirations of the Council.

5.

The relevant section of Policy LD should therefore be changed to state that development would be focussed in towns, local service villages and:

- "In Other Villages on appropriate infill, redevelopment or conversion sites, which have been identified as part of the neighbourhood plan for the village, to identify new ways of providing social and market housing in rural areas that are affordable to local people and where practicable encourage employment, retail or community facilities"

#### 6. **Conserving the Special Ecology of Purbeck**

The Charborough Estate is keen to conserve the ecology, character, and appearance of the countryside and rural settlements, and these objectives are fundamental to its management policy.

7.

Amongst other things, it is essential to provide SANGS to divert people (especially dog walkers) away from Special Protection Area Heathland. The Core Strategy fails to say where or how this will be achieved, although it is of strategic importance. The Charborough Estate has large scale opportunities for SANGS on the North West side of Wareham (in conjunction with new housing development). There is also a significant strategic recreational opportunity (identified by the Local Plan) at Morden Park. This may also function as SANGS.

8.

Therefore the Core Strategy needs to be changed to:

- Identify the general extent and location of SANGS, and
- In the case of Wareham, direct it to the north west side of the town (in conjunction with housing development at Northport and Carey.
- Identify Morden Park as amongst other things, a Country Park (see below).

#### 9. **Conserving the Special Landscape of Purbeck**

To repeat, the Estate is keen to preserve the ecology, character, and appearance of the countryside and rural settlements. In order to achieve those aims and objectives, it is essential that the countryside and rural property can be managed in the most productive manner, and that in turn requires supportive planning policies.

10.

Policy CO Countryside is not supportive. It is negative and restrictive in both spirit and letter.



11.

Furthermore, it conflicts with the latest advice from the Government which advises Planning Authorities to be more flexible with regard to conversion of barns to residential.

12

The opportunity at Morden Park referred to above could help restore rural landscape, create rural employment, and promote the rural tourism economy. In addition to the Country Park element, it offers the opportunity for some very high quality chalets and a touring caravan park.

13.

The local community wish to conserve the ecology, character and appearance of Purbeck's countryside. It is therefore essential that viable uses can be implemented for rural land and buildings. Otherwise the buildings will eventually end up as derelict eyesores and the land will not generate enough income to spend on landscape and conservation.

14.

To achieve this, and to reflect the latest advice from Government:

- Policy CO Countryside needs to be completely re-thought and re-written to allow and **encourage**:
  - a) The most appropriate re-use (or redevelopment) of rural buildings, especially Listed Buildings and those in Conservation Areas.
  - b) A flexible range of land uses, and
  - c) A balanced approach to sustainability issues in rural areas.
- Morden Park should be identified as a strategic recreational opportunity as in previous drafts of the Local Plan.

**15. The Best Places for More Homes at Wareham.**

It is understood that Wareham Town Council, Wareham St Martins Parish Council, and Arne Parish Council all preferred the idea of splitting greenfield housing at Wareham into several smaller sites around the northern and western side of the town, rather than one large housing estate at Worgret Road. We therefore seriously question whether the Core Strategy allocation at Worgret Road truly reflects local choice. We suggest that:

- Housing at Wareham should be split between Worgret Road, Carey and Tantinoby.

**16. More Jobs for Wareham**

Local people need more local jobs. Most of the land available for employment development is at Holton Heath and Dorset Green Technology Park. Although Wareham has good links to both, more employment land is needed in the town itself.

- Land at Carey should be allocated for employment as part of a mixed development (housing, employment and SANGS) for North West Wareham.

**17. Solving Traffic on the A351**

It is widely acknowledged that serious congestion on the A351 is bad for the Purbeck economy with serious impacts badly on Sandford and Corfe Castle. The next step, hopefully in the relatively short term, is the re-opening of the Swanage Branch railway may in the short term alleviate matters but the need to address the traffic issues through Sandford remains essential.

**18.**

In the medium term, the Transport and Accessibility Background Paper refers to the possibility of establishing a Park and Ride at Holton Heath with buses/trains thence to Wareham, Corfe Castle and Swanage. This would require investment in a significant car park at Holton Heath. There must at least in principle, be the possibility that housing at Sandford could partially fund such a scheme. The White Land is capable of delivering far more dwellings than assessed in the SHLAA. That could take through traffic off the A351 through Sandford and thus outweigh additional local traffic generated by the housing.

**19.**

In the longer term, circumstances may change to allow a Sandford Bypass to be built: again, this would have to be funded by housing at Sandford, at least in part. There may be no immediate prospect of such a change in circumstances, but the local community should not abandon its long term hopes.

**20.**

Sandford is a sufficiently sustainable location for more housing, provided that the development helps to solve, not exacerbate, the traffic problem.

21.

The Charborough Estate therefore strongly objects to the deletion of the "White Land" at Sandford on the grounds that:

- 1) It is contrary to PPS2, and thus to National Policy, and hence unsound.
- 2) The White Land should not be deleted as the growing need to address both the traffic and housing needs of the area must remain paramount.
- 3) Sandford is a sufficiently sustainable location for some greenfield housing development to be considered if future need arises.



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

**REPRESENTATIONS**  
on behalf of  
**THE CHARBOROUGH ESTATE**

**POLICY LD**  
**“Other Villages without a  
Settlement Boundary”**

AJP/20227/10.12.10

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## CONTENTS

- 1 INTRODUCTION
- 2 THE AIMS AND ASPIRATIONS OF THE WIDER COMMUNITY
- 3 THE WAY AHEAD FOR SMALL VILLAGES

## 1. INTRODUCTION

### 1.1

The Charborough Estate includes the village of Morden (East and West) classified in Policy LD (as drafted) amongst "Other Villages without a Settlement Boundary." It also includes much of the land adjoining Sandford.

### 1.2

The Estate **objects** to the following clauses in the draft Policy LD:

- *"New development should be concentrated within the settlement boundary of the Towns, Key Service Villages, Local Service Villages, and Other Villages with a Settlement Boundary."*
- *"Land falling outside of these defined settlement boundaries will be classed as open countryside (including Other Villages without a Settlement Boundary) like development will be permitted only in exceptional circumstances as set out in the Policy CO: Countryside."*

*"Land falling outside defined settlement boundaries or not identified for development in a Neighbourhood Plan will be classed as open countryside where development will be permitted only in accord with Policy CO: Countryside"*

### 1.3

The Estate objects to the first of these two clauses because it does not appear to allow for Greenfield development on allocations for housing or employment **adjoining** Towns or Key Service Village or employment at Holton Heath and Dorset Green Technology Park.

### 1.4

The Estate objects to the second of these two clauses because Morden (East and West) and other small Villages would continue to be classed as open countryside. This would not be appropriate for reasons set out below. Furthermore "only in exceptional

circumstances" is an overly restrictive and negative approach to the needs of the ever changing countryside, as set out in our parallel representations on Policy CO.

1.5

The Estate **supports in principle** the following clause:

- *"A further review will be undertaken through the Site Allocations Plan of housing provision in Local Service Villages and Other Villages with or without a Settlement Boundary to identify new ways of providing housing in rural areas that are affordable to local people. The outcome may supersede this policy."*

1.6

However, the Estate is concerned that this wording fails to adequately reflect the aims and aspirations of the local community and leaves things hanging in the air creating unsound uncertainty.

1.7

The Estate therefore believes that the wording of Policy LD is unsound as it has been drafted. In order to be sound, and to meet the aims, aspirations and needs of the local community, particularly young couples and families, it needs to be **changed** as follows:

- 1) Add, after "Towns", a further category "Strategic Employment locations: Holton Heath, Dorset Green Technology Park (for employment only)"
- 2) After "Local Service Villages" amalgamate all other villages under the heading "Other Villages"
- 3) Revise the wording of the second half of the Policy to read:  
*"New development will be concentrated*
  - a) *Within and adjoining the settlement boundaries of the Towns, and Key Service Villages*
  - b) *Within the settlement boundaries of Local Service Villages, and, for employment purposes only, Holton Heath and Dorset Green Technology Park;*

- c) *In Other Villages on appropriate infill, redevelopment or conversion sites, which have been identified as part of a Neighbourhood Plan for the Village, to identify new ways or providing social and market housing in rural areas that are affordable to local people, employment, and where practicable, retail and community facilities".*



## 2. THE AIMS AND ASPIRATIONS OF THE LOCAL COMMUNITY

### 2.1

The writer attended the Special Council Meeting which considered the Draft Core Strategy on 5 and 12 October 2010.

### 2.2

On the issue of "Other Villages" his notes of the debate read as follows:

## 13. Other Settlements

*County Councillor Mrs Brenton voiced concern the emphasis of the Core Strategy on small villages not being sustainable. Many villages are frozen in time by nimbles, planners and landowners. They would soon become like gated communities. The green belt has frozen some villages. Most of the villages in her County Council Ward have redundant buildings. Traditional barns are very costly to convert. Utilitarian buildings could be replaced by good quality houses. Consideration should be given to self build groups and long-leasehold properties, rather than freehold. She was not convinced about the removal of settlement boundaries because it does not achieve much. A change of approach is called for.*

### 13.1

*Nicholas Grove, Chair of Affpuddle and Turners Puddle Parish Council supported County Councillor Mrs Brenton. The removal of the development boundary would be the "death knell of our community."*

### 13.2

*Councillor Suttle referred to the Development Strategy on page 12. This would mean **no** building whatsoever in "other" villages up to 2026 except for rural exception sites. He understood the intentions until you start to think about what will happen – the result will be exclusive enclaves. There will be no incentive to bring forward exception sites which existing housing will be high-end and owners will object.*

13.3

*Councillor Suttle went on to propose on the basis of one dwelling out of two being affordable. This appears to be on the basis that market housing would in fact be allowed in the "other" villages.*

13.4

*Councillor Lovell preferred one for one.*

13.5

*Councillor Quin questioned about the smaller settlements, such as East Stoke which did not have a settlement boundary in the current Local Plan.*

13.6

*Councillor Goldsack complained that we could get no where with this debate tonight. He understood the need for redevelopment boundaries for "other villages" which currently have them. He would support one for one. He was concerned however that they were making policy on the hoof. It should be brought forward through an SPD. The issue was whether to leave the boundaries as per the Local Plan or as per the Core Strategy?*

13.7

*Councillor Budd said the proposal has merit, but it is too late to be properly considered. Can we roll this into a future policy?*

13.9

*Steve Dring explained that there were three options:*

- *Draft Core Strategy as proposed by the Officers*
- *One for one only where there is an existing settlement boundary*
- *One for one anywhere.*

13.10

*Councillor Suttle "I am trying to stop **small villages** becoming exclusive for rich bankers." The big landowners are not bringing forward exception sites. Is trying not to destroy village life. He would favour existing boundaries and one for one.*

13.11

*Councillor Budd proposes an "other villages" SPD. In the meantime work to existing boundaries.*

13.12

*Vote : Budd's amendment carried."*

2.3

These notes are not, of course, official minutes, but seek to reflect the views expressed by the Councillors. Their intention was clear: to prevent small villages like Morden becoming exclusive enclaves restricted to the high end of the housing market, by allowing for some small growth – County Councillor Mrs Brenton suggested 1% per annum. Therefore the wording of Policy LD as now drafted does not adequately reflect the aims and objections of the local community, for the reasons outlined in 1.3 and 1.4 above.

### **3. THE WAY AHEAD FOR SMALL VILLAGES**

#### **3.1**

In response to the Draft RSS, Pro Vision, on behalf of The Charborough Estate, prepared a Village Case Study based on Morden. This is reproduced here as Appendix A.

#### **3.2**

The references to the Draft RSS and in particular Development Policy C are now no longer relevant. Nevertheless most of what is said, and the ideas put forward, remain valid.

#### **3.3**

Thus the Drawing 20227 Revised identifies up to 20 sites which may be appropriate for some form of development or (in 3 cases) conversion from agricultural uses. Hence it is possible to envisage (say) the 3 conversion sites coming forward, plus by one new build site a year coming forward for residential, plus one site every 5 years for employment.

#### **3.4**

The development could take place in accord with an agreed programme forming a part of the Neighbourhood Plan. This could identify the sites, identifying the maximum rate of housing development, and specify thresholds beyond which no more market housing is allowed until more employment unity, or a community shop, or a play school is provided.

#### **3.5**

As outlined in para 3.10 (5) of the Study the Neighbourhood Plan could identify a healthy and lively mix of such elements as live – work barn conversions, open market infill housing, business unity and community facilities.

#### **3.6**

The housing market is moving away from a maximum percentage of owner-occupation. It is now becoming a broader mix of social rented (and shared ownership), market rented, and owner occupation. Thus the market is returning to its pre-1930 characteristics, when a wide socio-economic range were as likely to rent as to purchase. This might offer the opportunity of exploring some ideas, such as some units being

rented out at market rents but controlled by S106 agreement so as not to run ahead of inflation.

### 3.7

Innovative ideas such as these will take time to develop. They need to be proposed on an individual village basis, not as part of a Site Allocations DPD. Nor should they await a further review, and study and investigations and reports. In order to achieve the aims and aspirations of the local community the Core Strategy needs to enable the process to begin now, not some unspecified time in the uncertain future. Policy LD is thus unsound as drafted, and needs to be changed as we propose, in order to meet the aims and objectives of the local community and the needs of small rural villages.



**PURBECK DISTRICT COUNCIL  
CORE STRATEGY**

**PRE-SUBMISSION CONSULTATION**

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on behalf of  
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**IN RESPECT OF  
POLICY CO  
COUNTRYSIDE**

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- 1 Overview
- 2 Rural Land Uses
- 3 Sustainability

## **APPENDIX A**

Press Release from Department of Communities and Local Government Website, 18 October 2010

## 1. POLICY CO: COUNTRYSIDE – OVERVIEW

### 1.1

The Charborough Estate comprises extensive areas of rural Purbeck, primarily in the area bounded by Charborough Park, Sandford, Wareham and Bere Regis, but also in the Woolbridge area. It is therefore a significant stakeholder in the CS area, and has instructed Pro Vision to submit these Representations on its behalf.

### 1.2

The Estate is keen to conserve the ecology, character, and appearance, of the countryside and rural settlements, and that is fundamental to its management policy. In order to achieve those aims and objectives, which appear to accord with those of the local community, it is essential that the countryside and rural property can be managed in the most productive manner, and that in turn requires supportive planning policies.

### 1.3

Policy CO Countryside is not supportive. It is negative and restrictive in both spirit and letter.

### 1.4

Proposed Policy CO1 Countryside: would restrict development in the open countryside (including villages with no village envelope) to:

- Barn conversions for (in order of priority) (1) B1, B2, B8; (2) affordable housing; (3) community use; or failing any of those (4) tourism.
- Householder applications re: existing dwellings.
- Small scale business or tourism
- Stables or field shelters
- Farm diversification, or
- Community facilities
- Rural Exception Sites, or
- Gypsy/Traveller Sites

### 1.5 The Estate's Concerns

1. No new-build open market residential would be allowed, even where this would assist in the provision of employment and/or community facilities, thus improving the self-containment of a settlement, and thereby helping to contribute towards sustainability aims and objectives.
2. The Policy does not favour conversion of barns to work homes or open market housing even where:
  - B class uses or tourist accommodation would not be viable
  - B class uses would generate too much traffic in narrow lanes



- Any use other than residential would create an adverse impact on existing neighbours, and/or
  - Employment uses would draw too many people from nearby urban areas out into the open countryside in direct conflict with sustainability aims and objectives.
3. The requirement for 9 months marketing is quite unreasonable and would introduce unreasonable delay and cost.
  4. Tourism is acknowledged as an important factor of the Purbeck economy, and it is therefore illogical to place tourism accommodation last in order of priority in respect of barn conversions.
  5. In addition, the CS fails to acknowledge that there is a fundamental difference between the countryside north of Wareham, and south. Southern Purbeck is AoNB, northern Purbeck is not. It is pleasant countryside, but not outstanding. The Green Belt designation of much of it is **not** a "landscape" designation.

#### 1.6

There is no readily evident justification for these restrictions and requirements, which appear to be contrary to PPS4 which allows for residential conversions where appropriate. The pattern of development that could be created by imposing these restrictions and requirements could prove to be unsustainable by generating too much traffic and commuting into the open countryside. These requirements and restrictions are therefore neither justified nor in accord with national policy, and are therefore unsound.

#### 1.7

The Estate firmly believes there is "in principle" a case for considering small local developments of open-market units in villages where this can enable, for example, the provision of employment to the extent that the overall balance of commuting, and thus sustainability, could be improved for that settlement or the provision of affordable housing.

#### 1.8

For example, the Estate fairly recently proposed the conversion of a group of listed barns (which are significantly under-used and need a viable use for a long-term future) to one large open-market house, and two small cottages for renting to local families at affordable rents. This was refused on the basis of the current policy, which is to all intents and purposes the same as CS Policy CO. The local community thereby lost the opportunity to gain two affordable homes, and the barns still have no viable future use.

#### 1.9

Recently Andrew Stunell, Communities Minister, wrote to LPA's advising them to be more flexible with regard to conversion of barns to residential. Appendix A refers. The use of the phrase "affordable homes" (twice) will be noted. However, it will also be

noted that the press notice also uses the phrase "new **and** affordable housing" (our emphasis) which suggests that the intention is not restricted to social housing. In any case, our parallel Representations on Policy AH Affordable housing suggests a more flexible and realistic interpretation of the word "affordable".

#### 1.10 Changes Required

The local community rightly want to conserve the ecology, character and appearance of Purbeck's countryside. To do that it is essential that viable - and for the most part profitable - uses can be implemented for rural land and buildings. Otherwise the buildings will eventually end up as derelict eyesores and the land will not generate enough income to spend on landscape and conservation. To achieve this, and to reflect the latest advice from the Government, Policy CO Countryside needs to be completely re-thought and re-written. In particular it needs to allow and **encourage**:

- a) The most appropriate re-use (or redevelopment) of rural buildings
- b) The land uses outlined in Section 2, and
- c) A balanced approach to sustainability issues in rural areas, as outlined in Section 3.

## 2. FUTURE RURAL LAND USES

### 2.1 The Future Use of Rural Land

- a. Agriculture – increasingly important for bio security and world supply; Growing specialist sectors include organic or ‘welfare friendly’ food production, and development of bio fuels.
- b. Forestry
- c. Defence
- d. Recreation and tourism

### 2.2 The Future Role of Rural Villages

- a. Incidental setting for small businesses such as IT, haulage, organic food preparation, niche manufacturing, and niche trading using the internet
- b. Commuting into urban areas (to be discouraged)
- c. Some on-going retirement (likely to increase as population ages).

### 2.3 Rural Recreation and Tourism

- a. Accommodation: Hotels, Bed & Breakfast, holiday cottages and log cabins.
- b. Equestrianism (requiring the provision of field shelters, loose boxes, ménages, and equestrian-related dwellings)
- c. Paintballing, clay pigeon shooting, and similar activities (In theory allowed for by current policies but in practice giving rise to issues over noise, public perception of safety, disturbance of agriculture and wildlife, visual impact on the landscape)
- d. Country Parks (not for the most part allowed for by current policies on a **viable** basis)
- e. Traditional field sports and fishing (no planning issues)
- f. Hiking/cycling (provided for by current policies)
- g. Visiting historic buildings and villages (provided for by current planning policies, but raising issues of ongoing finance and viability)

- h. Enjoying attractive landscape and coastline (ditto)
- i. Heritage railways, museums, etc (not currently provided for by planning policies, but in practice less constrained)
- j. Show Grounds and race courses (not always provided for by current planning policy)
- k. Golf courses (constrained by current planning policies)
- l. Sports field and school grounds (provided for by current planning policies adjacent to towns and villages)
- m. Cemeteries and Woodland Burial Grounds (theoretically provided for by current planning policies, but in practice controversial).

#### 2.4 Renewables

There is, of course, a growing need to consider rural sites for such enterprises as

- a) Wind Farms
- b) Solar Farms
- c) Anaerobic Digester Units
- d) Biorefineries, and
- e) Waste-to-Power plants

Some Resource Recovery plants will also need rural locations (such as in converted buildings or disused clay or gravel pits).

### 3. SUSTAINABILITY

#### 3.1

There is understandable concern about the high level of car commuting from rural villages into towns and cities. It is thus logical to steer **major** development, particularly housing, to urban areas, where commuting need not be or can be undertaken by public transport.

#### 3.2

However, balanced consideration of the issues raised above and elsewhere should prompt a more considered view. A more balanced consideration would conclude that:

1. Just as the landscape and architectural quality of our countryside and villages has in the past depended on profitable uses, profitable new uses must be encouraged in future, to **sustain** landscape quality and the architectural quality of our villages.
2. It is far from sustainable not to make the best use of redundant buildings.
3. There is growing realisation that converting rural barns to employment is not automatically more sustainable than conversion to residential.

#### 3.3

An increasing number of Appeal Inspectors have come to the latter conclusion. A Decision at Square House Farm, Tattenhall Lane, Tattenhall, Cheshire probably had a key influence on PPS7. The Inspector said the:

*"... Highways Authority oppose an employment use that would involve large vehicles. That is right ... given the location of this site over 5km from any type of road superior to Class C. Clearly not all employment uses would involve large vehicles to any material degree, but such uses are not necessarily easy to find, and none came forward in response to the appellants' marketing... I have sympathy with the desire to find an employment use that would not generate traffic... but this qualification would impose severe constraints on any further marketing"... Therefore employment use was "... Neither feasible nor appropriate"*

He therefore allowed the appeal in favour of full residential conversion.

#### 3.4

A number of Appeal Decisions have followed this principle. In the South West these include Lower Langham Barns, Gillingham, Dorset (2004), Caer Bran Farm, Grumbia, Sancreed, Cornwall (2004), Hearn Farm, Cullompton (2004) and Thorn Farm Barns, Sidmouth (2005).

### 3.5

In one example at North Bolberry, Kingsbridge, South Devon, the Inspector allowed the conversion of a barn in the open countryside to one dwelling (2005). It would preserve a rural building in the landscape. Employment use was unsuitable, given the location. Residential use would accord with National and Local Planning Policies with particular reference to sustainable development, safe and adequate access and the character and appearance of the surrounding AoNB.

### 3.6

In August 2006, Inspector Alan Boyland allowed the use of a barn at Crockerton Wilts as a dwelling, with the following comments worth noting:

*"... those living here would inevitably be largely dependent on the private car".*

*"It is undisputed that the types of use favoured by ... policy..." (employment etc)  
"... would be likely to generate more traffic than residential use of this building. The Council accepted that, despite the policies, such uses would be likely to give rise to sustainability objections..."*

*"I conclude that the use of the Old Barn as a dwelling would represent a no less, and probably more, sustainable form of development than the alternatives favoured by the Development Plan Policy. Having regard to the alternatives, I find that there would be no material conflict with the aims of government guidance in this respect or with the priority given by... Policy ... to minimise the need to travel and supporting the increased use of non-car modes".*

### 3.7

The Appeal decisions quoted or referred to above have therefore firmly established the principle that residential conversion could be more sustainable than uses favoured by current policy. In the interests of sustainability, therefore, Policy CO Countryside must be revised.

**PURBECK DISTRICT COUNCIL  
CORE STRATEGY**

**PRE-SUBMISSION CONSULTATION**

**REPRESENTATIONS  
on behalf of  
THE CHARBOROUGH ESTATE**

**IN RESPECT OF  
POLICY C  
COUNTRYSIDE**

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# **APPENDIX A**

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- Press Release from Department of Communities and Local Government Website, 18 October 2010

## Housing

### Andrew Stunell: Farmers should be able to offer affordable homes on the farm

Published 18 October 2010

Councils should look to amend their existing planning policies to make it easier for disused farm buildings to be converted into affordable homes said Communities Minister Andrew Stunell.

The average house price in rural England has more than doubled over the past decade to over £250,000, but the average salary is still £21,000. The numbers of people on social housing waiting lists in rural areas has risen to 750,000.

So Mr Stunell has called on farmers to identify disused farm buildings that could be converted into new affordable homes for local people, and for councils to look favourably on their planning applications.

It fulfils a key Coalition Agreement commitment to enable the building of Homes on the Farm, by encouraging the redevelopment of disused agricultural buildings as new and affordable housing.

He said:

"Farmers are the custodians of our countryside, managing thousands of acres of rural land across England. But when they want to make disused buildings available for new homes, they can often face an uphill battle to get planning permission in the face of their council's development plans.

"As more young people are unable to afford to live in rural areas and village schools, shops and pubs struggle to survive, farmers are ideally placed to help bring the community together to help reverse this trend.

"That's why I want to make it easier for farmers to offer Homes on the Farm for local people. One small step for councils will offer a significant opportunity for communities to get the new and affordable homes their villages need. I want farmers to take their place at the forefront of this rural revolution alongside their local councils, to make farm buildings available, and to work with their local communities to shape the sustainable development of their countryside so it can remain a vibrant place to live for generations to come."

National Farmers Union planning adviser Ivan Moss said:

"The Home on the Farm scheme is an excellent opportunity for farmers who want to use their outbuildings for a constructive purpose. It should also sustain the rural economy by providing homes for those working in it.

"The NFU will watch with interest the outcomes of the first applications from farmers to their local councils to convert disused buildings into affordable homes and hope that councils will be equally eager to be pioneers in the scheme."

## Images







**PURBECK DISTRICT COUNCIL  
CORE STRATEGY**

**PRE-SUBMISSION CONSULTATION**

**REPRESENTATIONS**  
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**THE CHARBOROUGH ESTATE**

**IN RESPECT OF  
POLICY AH  
AFFORDABLE HOUSING**

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- 2 POTENTIAL EFFECTS ON LARGER SITES
- 3 POTENTIAL EFFECTS ON SMALLER SITES

## 1. INTRODUCTION AND SUMMARY

### 1.1

Policy AH (as amended) requires all housing developments of 2 dwellings or more to provide 50% affordable units. This reflects the aims and aspirations of the local community to enable local people to continue living in Purbeck, who would otherwise be unable to afford to do so. The Charborough Estate respects and supports those aims and aspirations.

### 1.2

Affordable Housing is described in PPS3 as restricted to social rented and shared ownership. It is not clear whether that is the definition of affordable housing used in the Core Strategy (and in that respect it is unsound).

### 1.3

The concerns of the Charborough Estate are that:

- a) Principally, the policy will result in a stark split in larger new developments, whereby 50% would be social rented and 50% executive houses in order to make the development stack up.
- b) Smaller infill development may not be viable.

### 1.4

The potential effects of (a) are outlined in Section 2 below: People on middle incomes may be squeezed out more than they are now. Section 3 below outlines the potential effects of (b): infill development may be restricted to single dwellings and the affordable element may not be achieved.

### 1.5

On the basis of these potential affects the Charborough Estate is concerned that Policy AH is neither sound nor will meet the aims and aspirations of the local community.

## 1.6 The Changes Required

In simple terms the likely problems arising might be addressed by:

- 1) refining the requirement; instead of a stark "black and white" difference between affordable and market, the policy should require a healthy mix of social rented, shared ownership, controlled – price open market, and uncontrolled open market.
- 2) Not requiring small infill sites to provide social rented dwellings

## 1.7

Subject to further discussion, policy AH Affordable Housing might be changed to require something along the following lines:

*"Developments of 5 or more dwellings, or a site area of 0.15 Ha or more, will be required to provide a mixture of:*

- a) social rented housing*
- b) shared ownership housing*
- c) market housing of a size and therefore price less than the average for the District,*
- d) three bed market housing; and*
- e) Unrestricted open market housing.*

*The proportion provided by (a)(b) (c) and (d) will be required to total at least 50%, the total of (a), (b) and (c) at least 40%, and the total of (a) and (b) at least 30%.*

*"Developments of less than 5 dwellings or less than 0.15 ha will be required to provide 50% either shared ownership housing or market housing of a modest size, and therefore of a price less than the average for the District."*

## 2. EFFECTS ON GREENFIELD SITES

### 2.1

If a larger site is required to provide 50% social housing, then the other 50% is likely to have to be relatively high-end market housing in order to make the development stack up.

### 2.2

The effect of that will be to cater for those on the Housing Waiting List at one end of the spectrum, and for high earners at the other end, but not for average income households in the middle.

### 2.3

Young families are thus likely to be lost to the District. Once their children have settled into schools elsewhere, they will not return.

### 2.4

Alternatively, they may seek to join the Housing Waiting List, which would be counter productive.

### 2.5

At the Special Council Meeting considering the Core Strategy, as reconvened on 12 October 2010, Councillor Suttle said (in the debate on Swanage) that local people are being driven out of the town they are born in. Therefore truly affordable housing is essential – that is to say on sale at £100,000 or less. What is on sale is not affordable.

### 2.6

If more housing were provided to purchase at lower cost that might well have the effect of reducing the number of people on the Housing Waiting List. Some of the householders in the "Red" Band may be able to afford a small 2 or 3 bed house, either at market rent or market price, provided the location and design was not orientated to second home buyers or out-of-District retirees.

## 2.7

On a large development for which the writer has acted as Planning Consultant in Somerset, the Affordable Housing requirement has included a proportion of open-market dwellings of all sizes, and therefore a price, less than the average for the District. This has been controlled by S.106. Something similar can be achieved in Purbeck.

### 3. POTENTIAL EFFECT ON SMALLER SITES

#### 3.1

Many infill or redevelopment sites already have a dwelling or other property on them. They are likely to be released for development or redevelopment only if, on balance, the financial gain outweighs any disadvantages arising from selling.

#### 3.2

Consider a hypothetical example of a 4 bed house with a large garden big enough for 2 small houses or a large one. Let us say the existing property is worth:

- a) £500,000 as it is, or
- b) £450,000 with a large house built in the garden, or
- c) £400,000 with two houses built next door, one social rented.

#### 3.3

If the new large house were to be worth £450,000 the site value would be in the order of £150,000. Thus the vendor would be £100,000 better off and may consider it worth selling.

#### 3.4

However, consider if the two houses were to be built, say a 3-bed market house and a 2-bed social rented house. The 3-bed house might sell for (say) £250,000. The site would therefore be (say) worth only £80,000 for the market house and £20,000 for the social house.

#### 3.5

Thus the vendor would not be any better off. Therefore they or the developer they are selling to will only apply for the single large dwelling, and no affordable provision will be achieved.

#### 3.6

However, if both of the houses in paragraph 3.4 are open market then:

- a) the existing house may not be devalued so much because there is no social rented next door – say £425,000 - £450,000

- b) the site will then sell for about £125,000 - £150,000.

### 3.7

Thus the vendor could be as well off with two as with one. The developer may well be keen to maximise the number of units, and therefore two units – both small family houses – are likely to be achieved.





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

**REPRESENTATIONS  
on behalf of  
THE CHARBOROUGH ESTATE**

**IN RESPECT OF  
POLICY TA  
TOURISM**

AJP/20227/10.12.10

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## REPRESENTATION RE POLICY TA TOURISM

1.

The Charborough Estate has extensive land holdings in Purbeck District, from the A 31 in the north to the A 351 in the south. The Estate is therefore a significant stakeholder in the Core Strategy area. Much of the land is in the Green Belt. Some of it has tourism potential. The Estate has therefore instructed Pro Vision to submit this representation in respect of Policy TA Tourism Accommodation and Attractions.

2.

As explained in our parallel representation on Policy CO Countryside, rural land uses may well have to change to some degree in order to maintain the character, ecology and appearance of the countryside and rural settlements. A viable rural economy and viable rural land uses are essential to that end.

3.

Appropriate forms of tourism can potentially make a valuable contribution towards that objective.

4.

The Estate is particularly concerned that:

- a) No chalets or campsites would be allowed in the Green Belt, although sensitive siting of a limited number of chalets and seasonal camping sites can be a useful contribution to farm diversification;
- b) The Council is unlikely to support additional touring caravan sites, although, for example, there is currently no such provision along the A 31 (T) or the A 35;

- c) In particular, the policy effectively eliminates the proposals in the Local Plan for Morden Park, because:
- i) some chalets and a touring camping/caravan park would be likely to be needed to enable the project to be viable, and
  - ii) The policy requires proposals for new tourist and leisure attractions to be focussed in towns and key / local service villages.

5.

**APPENDIX A** sets out the Policy for Morden Park in the Adopted North East Purbeck Local Plan. It is important to note that the Policy for Morden Park was inserted on the recommendations of the Local Plan Inspector, who had considered it as, effectively, an objection site.

6.

**APPENDIX B** sets out the Policy for Morden Park in the Purbeck District Local Plan Final Edition. This carries forward the policy from the North East Purbeck Local Plan.

7.

**APPENDIX C** is an extract from the Report to Purbeck District Council by Footprint Ecology on "Purbeck Core Strategy, Implications of Additional Growth Scenarios for European Protected Sites". This identifies the potential value of Morden Park as SANGS

8.

The Estate wishes to open up Morden Park, partly to the public on the lines of Moors Valley Country Park (which is also in the South East Dorset Green Belt), and together with a sensible number of high quality chalets and a touring caravan/camping park. This would:

- a) Result in environmental benefits by restoring the ornamental landscape and giving it a viable future which will maintain it
- b) Result in ecological benefits both on site, and by drawing visitors away from SPA Heathland;
- c) Create social benefits by opening the site to the public, and
- d) Bring economic benefits through the creation of open-countryside style employment for the Morden area, thus helping to increase the self-containment of the local community.

9.

Morden Park is not well related to public transport. However, "sustainability" is addressed by items (b) and (d) above. It might also be addressed by exploring the potential for a cycle way from Wareham / Sandford through Wareham Forest using the existing tracks and paths.

10.

Policy TA therefore needs to be **changed** as follows:

- a) Second bullet point to read:

*"Except as indicated below, new chalet or campsites, or extensions to existing ones, will be permitted in the AONB or Green Belt"*

- b) Third Bullet Point to read:

*"Due to the adequacy of current provision for touring and static caravan sites, and in order to protect the landscape, it is unlikely*

*that additional provision can be supported, except as indicated below"*

- c) Add the following paragraph:

***"Caravan facilities along the A 35 and A 31 (T)***

*Since there are currently no touring caravan sites along the A 35 or A 31(T), consideration may be given to such proposals subject to the criteria of Policy CO Countryside"*

- d) Add the following paragraph:

***"Morden Park***

*In view of the potential landscape, ecology, social and economic benefits, the Council will explore with the landowner the scope for restoring Morden Park (as identified on the Proposals Map) and opening it to the public as a Country Park, together with a modest number of high quality chalets, and a touring caravan / camping park".*



**PURBECK DISTRICT COUNCIL  
CORE STRATEGY**

**PRE-SUBMISSION CONSULTATION**

**REPRESENTATIONS**  
on behalf of  
**THE CHARBOROUGH ESTATE**

**IN RESPECT OF**

**SECTION 7.3  
POLICY CEN  
WAREHAM & SANDFORD**

AJP/20227/10.12.10

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## **CONTENTS**

- 1 Introduction and Summary
- 2 Wareham (and Sandford) as a preferred location for development
- 3 North Wareham as a preferred location for urban extensions

## **APPENDICES**

- A Table B1 (Revision 2)  
Table B2 (Revision 2)
- B Sketch Map to show "White Land" at Carey and Tantinoby and scope for POS and SANGS on Charborough Estate land
- C Responses to July 2010 Round of Consultation

## **1. INTRODUCTION AND OVERVIEW**

### **1.1 Introduction**

The Charborough Estate is a significant stakeholder in Purbeck, particularly in relation to Wareham and Sandford. The Estate owns extensive land holdings adjoining the north side of Wareham, and most of the land on both the north and south sides of Sandford. These include Heathland SPA, and potential SANGS and employment and housing land. Pro Vision are instructed by the Estate to submit these Responses to Section 7.3.

### **1.2**

In essence the Estate wishes to make the following representations:

1. Wareham and Sandford is an undoubtedly sustainable location for further housing and employment allocations in Purbeck District, if required either now or in the future.
2. It is unlikely that 200 greenfield houses at Wareham will meet the needs of the local community.
3. Tantinoby and Ferncroft offer sustainable locations for urban extensions, if required either now or in the future.
4. It would therefore be "sound" in principle to delete them from the green belt as strategic "White Land"; Consideration may need to be given to allocating Tantinoby and Ferncroft for housing at this stage.
5. More employment land is needed in Wareham, and Charborough Estate land offers an opportunity to extend the Westminster Estate.
6. SANGS will be required and Charborough Estate land offers extensive opportunities to achieve this; this should be indicated by the Core Strategy and on the proposals maps.
7. The CS would be "sound" if it retained the "White Land" at Sandford outside the Green Belt; there is no justification in absorbing it into the Green Belt.

### **1.3 Wareham as a sustainable location**

This is expanded upon in Section 2.



#### 1.4 More housing may be needed for Wareham

Only 485 dwellings are projected in Wareham and Sandford by the CS to 2027. Yet there are 382 on the Housing Waiting List for Wareham. Even if 50% of housing is affordable and some on the Waiting List can wait 17 years, 485 dwellings is nowhere like going to meet the aims and aspirations of the local community in providing for local people and local families.

#### 1.5 Tantinoby and Ferncroft

The case for these as urban extensions is made in Section 3. If these are not needed immediately, it is clearly a "strategic" decision to create "White Land" on the edge of the green belt to enable possible future need to be met.

#### 1.6

At Carey, there is a small side valley within which development can take place without impact on the wider landscape extending along the north-east of Carey Road, and the "White Land" or allocation should extend along that valley to enable current or future needs to be fully met in terms of both housing and employment. This is shown in Appendix A.

#### 1.7

At Tantinoby, the "White Land" should be linked to the Bere Regis Road to allow for vehicular access to be direct off that road in addition to, or as an alternative to, vehicular access through the Northport Park Estate. This is shown in Appendix B.

#### 1.8 Employment Land

Although table 3 envisages 35.75 Ha of employment land in the District remaining available for development,

- a) 33 Ha is at Holton heath and Dorset Green Technology Park.
- b) Only 1.2 Ha is at Swanage
- c) None is at Wareham

Wareham has good access to Holton Heath and reasonable access to Dorset Green Technology Park. Nevertheless, the proposal not to allocate more at Wareham appears unsound when more is available as part of mixed housing and employment development at North Wareham.

#### 1.9 SANGS

In September 2010 Footprint Ecology produced a report for the District Council entitled "Purbeck Core Strategy, Implications of Additional Growth Scenarios for European Protected Sites". This is on the website as part of the evidence base. Particular

concern for the Charborough Estate are comments on Wareham. The background document on housing makes it clear that this has influenced overall housing numbers.

#### 1.10

At paragraphs 2.41-2.47, the report looks at the potential impact on Wareham Forest and how these could be mitigated. It claims that mitigation measures on site would be difficult to implement. Options could involve:

- Limiting and re-distributing parking to focus parking on a few locations, in particular controlling and reducing roadside parking on the B3075 and the Wareham-Bere Regis road;
- Enhanced on-site wardening to promote responsible access through presence of wardens in areas important for wildlife; and
- Promoting access to areas of mature plantation away from the areas with protected bird species.

#### 1.11

Nevertheless, the Report concluded that, at present, given the implication of the Forestry Commission's open habitats policy and lack of "ownership" of the area, it is not possible to be confident that on-site mitigation measures will be effective from resolving the problems associated with access levels from new developments. It is the higher growth scenario and higher growth scenario combination with 500 houses in Wareham that are of particular concern.

#### 1.12

Paragraphs 2.57-2.76 of the Report consider the potential for SANGS. SANGS would be required, it says:

- In the north of the district, between Lytchett Matravers and Bere Regis or to the north of Bere Regis
- Near Wareham, to the west or north west of the town, drawing new residents away from sensitive locations within Wareham Forest and Hartland/Stoborough/Arne
- To the north of Swanage; here a SANG would attract people who would otherwise visit Godlingstone, Rempstone and Studland Heaths.

#### 1.13

The Report says that these locations would remain important in any mitigation package for the additional growth scenarios and would need to be capable of absorbing the increased level of recreation. The scenarios involving increased development at Wool mean it is also necessary to consider SANGS in the Wool area.

1.14

Paragraph 2.62 of the Report states that one potential SANG location in the north of the district is Morden Park, which is allocated within the District Local Plan as a potential location for a large new area of green space. The site was recommended by the Inspector for the Public Inquiry into the North East Purbeck Local Plan. It is adjacent to Wareham Forest and is in many ways similar in character. It might therefore be to potentially attract visitors who would otherwise visit Wareham Forest, which is known to draw people from a wide geographical area. There are a number of important issues which would need to be resolved, however.

1.15

Paragraph 2.68 of the Report states that detailed consideration immediately around Wareham would seem to indicate that there is little potential for an effective SANG. The attractiveness of the local heaths means that any SANG would need to be very large, carefully designed and attractive, with a rural and wilderness feel, in order to draw visitors. The paragraph goes on to claim that potentially the only opportunities lie to the west of the town, which the report writers consider would be ineffective at diverting visitor pressure away from the heaths, not least because it is separated from the existing and proposed residential areas by the bypass and the A352, which are busy roads.

1.16

It is extremely surprising that the report does not consider other potential SANGS on the North West side of Wareham. The maps reproduced in the report make it clear that there is a corridor of opportunity on the North West side of the town clear of the existing heathlands and Forestry Commission areas with public access.

1.17

The Report writers did not consult the Charborough Estate, who (with limited exceptions) own the land in this corridor. This is despite the repeated submissions to the LPA both in writing and in diagrams that extensive SANGS can be provided to draw existing and new residents away from SPA heathland.

1.18

There must therefore be a serious question mark as to whether this report is sound. The facts are that the Charborough Estate is in a position to provide extensive SANGS on the north west side of Wareham such as to move housing around the town.

#### **1.19 Sandford "White Land"**

The reasons why the CS retain the Sandford "White Land" are outlined at paras 3.10 - 3.12 below.

#### **1.20 Responses to July 2010 Round of Consultation**

These submissions are attached as Appendix A. Although in certain details now overtaken by events much of what was submitted then remains valid now.

## 2. WAREHAM AS A SUSTAINABLE FOCUS FOR DEVELOPMENT

### 2.1

Wareham is the most sustainable location in the District. It is the focus of good quality public transport, education, local government, health services, and employment, with scope for more.

### 2.2 Public Transport

Public Transport already focuses on Wareham in terms of both rail and bus, and will focus more so on Wareham when the Swanage Branch is re-opened; furthermore, Greenfield housing around the town may well be able to help fund further improvements (such as that re-opening).

### 2.3

The current main public transport routes in Purbeck District comprise:

- Half hourly electric train service Weymouth-Waterloo serving Wool, **Wareham**, Holton Heath (and Poole).
- Hourly bus (40) **Swanage** – Poole serving Langton Matravers, Kingston, Corfe Castle, **Wareham**, Sandford, Holton Heath and Upton.
- 3 buses an hour (8) from Upton to Poole (making 4 buses an hour with Route 40).
- Express bus Poole – Exeter every 2 hours serving Upton, Sandford, **Wareham** and Wool.
- Hourly bus Bournemouth to **Swanage** via Sandbanks Ferry (half hourly during summer, weekends and school holiday).

Thus the only **corridor** along which the **bus** service is more than hourly is Wareham – Sandford – Upton (with a quarter hourly service from Upton to Poole).

### 2.4

It is understood that the Swanage Branch may re-open in 2013 subject to government funding and the implementation of re-signalling from Eastleigh to Weymouth. Funding has been achieved for including the junction at Worgret in the re-signalling of the main line through Wareham. Thus rail based public transport in Purbeck will focus on Wareham.

### 2.5 Employment

Employment is also focussed on Wareham and the Wareham-Heath corridor with employment in the Town Centre, the Westminster Road Industrial Estate, the Sandford

Lane Industrial Estate and a major employment site at Holton Heath within walking/cycling distance of Northport and Sandford.

## 2.6 Education

**Schools** are focussed on Sandford and Wareham, which have currently two First Schools, two Middle Schools, and one Secondary School, although that is shortly to be re-organised.

## 2.7 Retail

A **Supermarket** is located in Wareham Town Centre together with a range of retail outlets.

## 2.8 Recreation and Leisure

Wareham (including Northport-Sandford) enjoys the following existing and potential facilities within walking or cycling distance:

- Rex Cinema;
- Purbeck Sports Centre;
- Wareham Gold Club;
- The Riverside;
- Wareham Forest;
- Morden Park (potential future Country Park); and
- Train to the sea (future)

## 2.9

These recreational facilities available to the Wareham area are important because (with exception of Wareham Forest) they can help draw people away from internationally designated environment assets and also improve the quality of life.

## 2.10

Research suggests recreation and leisure can generate surprisingly high percentages of car mileage. The ability to walk or cycle to significant recreation and leisure facilities can therefore make a material contribution to sustainability. The only public sports centre in Purbeck is at Wareham. The potential to provide extensive SANGS in association with new housing at Wareham will also bring new opportunities for country walks and dog walking, without using the car.

## 2.11 Community Support

Some members of the community – such as the deprived, the disabled, and some elderly people – need community support. Dorset Social Services have a local office in Wareham and a Day Centre. These are available to give local support to existing and future residents in Wareham (including Northport and Sandford). Wareham also has a hospital, which Bovington-Wool does not.

## 2.12

### Other Factors

- a) *AoNB*  
Part of Purbeck is washed over by the AoNB. Thus any Greenfield sites in that part of the District may reduce the amount of green countryside in the AoNB, and impact on the nationally protected landscape. This does not apply at Wareham where the SHLAA identifies "suitable" sites for at least 500 dwellings outside the AoNB.
- b) *SANGS*  
Ecological interests could benefit significantly by the provision of extensive SANGS as a buffer between existing residential areas at Wareham and the Heathland SPA. However, that can only be achieved in conjunction with a sufficiently sizeable housing development at Wareham.
- c) *Delivery*  
As mentioned the SHLAA identifies opportunities for at least 500 dwellings on Greenfield sites at Wareham, promoted by landowners/developers, outside the AoNB, the floodplain, or the 400m "no go" zone around the Heathland SPA, inside the bypass so far as the western boundary of the town is concerned, and, in the case of sites on the northern edge of the town, able to deliver the extensive SANGS required.

### 3. DEVELOPMENT AT WAREHAM (INCLUDING WAREHAM ST MARTIN)

#### 3.1

The direction of growth for Wareham should give priority to Ferncroft and Tantinoby Farms, because development in these directions would be as sustainable as any other, and would provide extensive SANGS on the north side of the town as an essential buffer between the town and the Heathland SPA.

#### 3.2

Deletion of the "white land" between Sandford (Wareham St Martin) and the rail line would be unsound because there are no exceptional circumstances to justify that particular change to the green belt boundary, and this is a sustainable location in which to retain a potential "reserve site".

#### 3.3 The Direction of Growth at Wareham

The SHLAA identifies a number of Greenfield sites which meet all the following criteria:

- a) Not in AoNB
- b) Not in Floodplain
- c) Not outside the bypass to the west of the town
- d) Promoted by landowner/developer who will deliver development on the site (in response to appropriate policy changes) and
- e) Over 25 units potential

#### 3.4

These sites are:

6/23/0166	Tantinoby Farm	80 units
6/23/0167	Ferncroft Farm	190 units
6/23/0173	Worgret Road	<u>130 units</u>
		<u>400 units</u>

There are a couple of smaller Greenfield sites which meet criteria (a) – (d) inclusive but are not big enough to relate to strategic directions for settlement extensions.

#### 3.5

Our Tables B1 and B2 compares the accessibility of the three main locations. This is assessed by measuring the distance (on a 1:5000 OS base) by the shortest available distance on foot from the centre of the likely area of housing development to the centre of the facility in question. The average distance is calculated at the foot of the table. Distances less than 1000m are highlighted. Those more than 1600m (1 mile) are in italics.



### 3.6

It will be noted that there is no material difference between Ferncroft and Worgret Road. Tantinoby is nearly as good as both Ferncroft and Worgret Road. Thus all three directions of growth are in principle "sustainable".

### 3.7

The Estate considers that development at both Ferncroft and Tantinoby may be necessary to deliver the extensive SANGS that may be needed to protect the Dorset Heathland SPA from the existing residential areas at Wareham. The provision of SANGS may incur considerable cost (not to mention loss of the value of the land given over to that use). Car Parks, interpretation Boards, footways, legal costs and insurance may all arise. Bearing in mind that only 50% of the Greenfield housing will be open-market, the Estate is concerned that development at Ferncroft alone may not be enough to fund the provision of SANGS.

### 3.8

We question whether development along Worgret Road (opposite Purbeck School) could provide the SANGS required; no evidence has been provided to demonstrate such provision.

### 3.9

Therefore:

- Priority for development along Worgret Road may prove to be unsound because, although otherwise sustainable, it is unlikely to be able to deliver the necessary SANGS.
- Priority for development in both the Ferncroft and Tantinoby directions would be sound, because both would be sustainable, and together they could deliver the SANGS needed; it would also include employment land at Westminster Road.

### 3.10 Wareham St Mary (Sandford)

The Core Strategy proposes to delete the "white land" currently excluded from the Green Belt between Sandford and the railway line in the Local Plan. The Estate has three reasons for very strongly opposing this:

- 1) PPS2 "Green Belts" states that detailed Green Belt boundaries should be altered only in exceptional circumstances. No such circumstances have been demonstrated in this case, and the proposal is thus contrary to National Policy and hence unsound.

- 2) Deletion of the "White Land" and subsuming it into the Green belt would permanently close the door on any long term prospect for reconsidering a Sandford Bypass – an aim and objective which has been, and continues to be a long-held aspiration of the local community, in Sandford and across the District. There may be no immediately prospect of a change in circumstances to enable such a bypass (which would need to be at least part funded by the development) but the local community should not abandon its long term hopes.
- 3) Sandford is a sufficiently sustainable location for some Greenfield housing development, with close relationships (as acknowledged in the background papers and the earlier Consultation Documents) with Wareham and Holton Heath; if a future need arises for further housing to be identified, it will be appropriate to re-consider this site.

### 3.11

For example, the Transport and Accessibility Background Paper refers to the possibility of establishing a park and ride at Holton Heath with buses/trains thence to Wareham Corfe Castle and Swanage. This would require investment in a significant car park at Holton Heath. There must at least in principle be the possibility that housing at Sandford could fund (or help fund) that: the white land is capable of delivering far more dwellings than assessed in the SHLAA. That could take through traffic off the A351 through Sandford and thus outweigh additional local traffic generated by the housing.

### 3.12

The Estate therefore very strongly opposes the fact that the CS proposes to delete the "White Land" and include it within the green belt. This is in conflict with National Policy (and thus unsound), and would prevent the possible needs of the community in the medium term being met, and close the door on longer term community aspirations.

**TABLE B1 SHORTEST DISTANCE IN METRES (Revision 2)**

<b>Destination</b>	<b>Tantinoby</b>	<b>Ferncroft</b>	<b>Worgret Road (inside bypass)</b>
Purbeck School	1795	1690	890
Primary School	2495	1550	150
Bus Route with more than 1 bus per hour	820	725	890
Rail Station	930	825	1310
Town Centre	1685	1790	890
Potential Supermarket Near Station	810	795	1360
Westminster Road Industry	545	425	1645
Sandford Lane Industry	1395	1290	1755
Purbeck Leisure Centre	2695	1750	350
Potential SANGS	50	70	1755
<b>AVERAGE</b>	1322	1091	1099

**TABLE B2 (Revision 2)**

PRINCIPAL DEVELOPMENT DIRECTIONS AT WAREHAM			
Issue	Worgret Road	Ferncroft Farm	Tantinoby Farm
Green Belt?	X	X	X
Not in AoNB?	✓	✓	✓
No Adverse Landscape Impact?	✓	✓	✓
Out of Floodplain?	✓	✓	✓
Provide Extensive SANGS	X	✓	✓
Not Affect SSSI/SPA	✓	✓	✓
Support Town Centre	✓	X	X
Support Development of Northport Centre	X	✓	✓
Accessible	✓	✓	✓
Adverse Impact on Amenity of Existing Residents	✓	X	X
	✓ 7 X 3	✓ 7 X 3	✓ 7 X 3

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PURBECK DISTRICT COUNCIL  
CORE STRATEGY  
PRE-SUBMISSION CONSULTATION  
REPRESENTATIONS  
on behalf of  
THE CHARBOROUGH ESTATE  
IN RESPECT OF  
SECTION 7.3  
WAREHAM & SANDFORD  
AND POLICY CEN

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# APPENDIX A

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- Table B1 (Revision 2)
- Table B2 (Revision 2)

**TABLE B1 SHORTEST DISTANCE IN METRES (Revision 2)**

<b>Destination</b>	<b>Tantinoby</b>	<b>Ferncroft</b>	<b>Worgret Road (inside bypass)</b>
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Purbeck Leisure Centre	2695	1750	350
Potential SANGS	50	70	1755
<b>AVERAGE</b>	1322	1091	1099

**TABLE B2 (Revision 2)**

<b>PRINCIPAL DEVELOPMENT DIRECTIONS AT WAREHAM</b>			
<b>Issue</b>	<b>Worgret Road</b>	<b>Ferncroft Farm</b>	<b>Tantinoby Farm</b>
Green Belt?	X	X	X
Not in AoNB?	✓	✓	✓
No Adverse Landscape Impact?	✓	✓	✓
Out of Floodplain?	✓	✓	✓
Provide Extensive SANGS	X	✓	✓
Not Affect SSSI/SPA	✓	✓	✓
Support Town Centre	✓	X	X
Support Development of Northport Centre	X	✓	✓
Accessible	✓	✓	✓
Adverse Impact on Amenity of Existing Residents	✓	X	X
	✓ 7 X 3	✓ 7 X 3	✓ 7 X 3

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**PURBECK DISTRICT COUNCIL  
CORE STRATEGY**

**PRE-SUBMISSION CONSULTATION**

**REPRESENTATIONS  
on behalf of  
THE CHARBOROUGH ESTATE**

**IN RESPECT OF**

**SECTION 7.3  
WAREHAM & SANDFORD  
AND POLICY GEN**

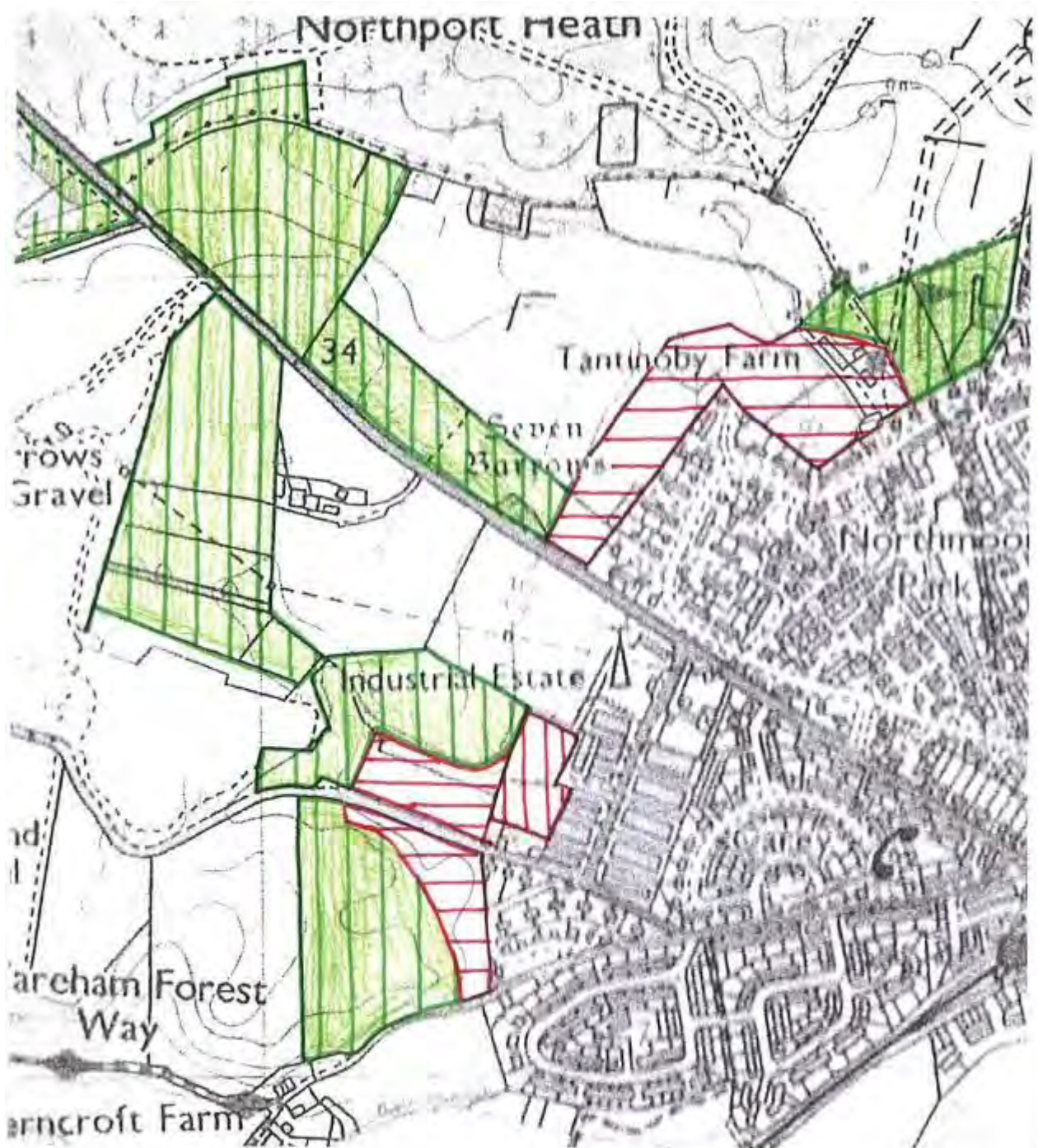
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## **APPENDIX B**

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- Sketch Map to show "White Land" at Carey and Tantinoby, and scope for POS and SANGS on Charborough Estate Land





LAND OUTSIDE 400 M HEATHLAND S.P.A. BUFFER ZONE AVAILABLE FOR HOUSING

LAND AVAILABLE (IN CONJUNCTION WITH HOUSING) FOR EMPLOYMENT

LAND AVAILABLE, DEPENDANT ON DETAILED STUDIES AS TO AMOUNT REQUIRED & LOCATION, FOR P.O.S SANGS, & REPLACEMENT ALLOTMENTS IF APPLICABLE



SCALE 1: 6250 APROX

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**PURBECK DISTRICT COUNCIL  
CORE STRATEGY**

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THE CHARBOROUGH ESTATE**

**IN RESPECT OF**

**SECTION 7.3  
WAREHAM & SANDFORD  
AND POLICY CEN**

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## **APPENDIX C**

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- Responses to July 2010 Round of Consultation



# **PURBECK LOCAL DEVELOPMENT FRAMEWORK RESPONSES TO JULY 2010 ROUND OF CONSULTATION**

**on behalf of  
THE CHARBOROUGH ESTATE**

## **CONTENTS**

1. INTRODUCTION AND KEY POINTS
2. OVERVIEW
3. BACKGROUND PAPER 6 SETTLEMENT EXTENSION SITES
4. GREEN BELT REVIEW DRAFT REPORT
5. "WHERE SHALL WE BUILD IN WAREHAM?"
6. REVISED TABLES A, B1 & B2
7. COMMUNITY BENEFITS AND CONTEXT MAPS FOR TANTINOBY AND FERNCROFT SITES

AJP/20227/July 2010

## 1. INTRODUCTION AND KEY POINTS

### 1.1 Key Points

The Government requires the Core Strategy to:

- Meet the needs of the local community, and
- Be "sound"

The Government has also made it clear that one of their guiding principles is fairness.

- 1.2 More than 200 greenfield homes in Wareham may be required to meet local needs, because:
- a) This equates to only 1 dwelling per month for the next 16 years.
  - b) There are 382 on the Wareham housing list, and
  - c) There may be more opposition to housing in Swanage than in Wareham.
- 1.3 Option C at Wareham (breaking the greenfield housing down into more than one site) has been suggested by some local people, and both Wareham St Martin and Arne Parish Councils.
- 1.4 Deletion of the "white land" at Sandford and putting it into the Green Belt would be:
- a) Significantly affect any future reconsideration of a Sandford Bypass.
  - b) Be unsound, and
  - c) Be potentially unfair

## 2. OVERVIEW

### 2.1 Will the proposals meet the needs of the local community?

The Government is committed to the principle of "Localism" whereby local communities are involved in shaping the future of their towns, villages and neighbourhoods. The Government is also equally committed, so far as practicable, to ensuring the needs of each local community are planned for – housing, jobs, etc.

2.2 The Charborough Estate is not convinced that only 200 greenfield homes at Wareham will be sufficient. That equates only to 1 house per month for the next 16 years, and only 1 affordable house per two months. Yet statistics on display at the "Road Show" at Wareham on 12 July 2010 demonstrated that there are 382 people on the Purbeck housing list who want to live at Wareham.

2.3 Therefore there is a need to consider:

- a) More greenfield housing, either now or in the future;
- b) Removing Tantinoby Farm and Ferncroft Farm sites from the Green Belt now, so that they can be considered for further housing now, or within the period to 2026.

2.4 Consideration should be given to dividing the greenfield housing at Wareham into more than one site (as verbally suggested by a number of visitors at the Road Show, and also by Wareham St Martin Parish Council and Arne Parish Council). Thus, for example:-

- a) The allotments at Tantinoby Farm could be retained, and the site reduced to about 100 homes,
- b) About 50 homes could be accommodated on the northern part of the Ferncroft site, north of Carey Road.

This could be combined with another site (eg. Worgret Road) to achieve up to 350 homes.

2.5 The Charborough Estate is very strongly opposed to the designation of the "white land" at Sandford as greenbelt. There are no sound reasons for doing this on a stand-alone basis. The only possible "sound" basis would be to compensate if both Tantinoby Farm and the Ferncroft Farm sites are released from the greenbelt.

2.6 The analysis of our Tables A, B1 and B2 (which we consider to represent a sound comparison of Wareham and Swanage, and of the three main sites at Wareham) therefore demonstrate:

1. Wareham remains a far more sustainable location for housing than Swanage; we understand there may be greater opposition to housing in Swanage than Wareham; the Council may therefore wish to consider switching some housing from Swanage to Wareham;

2. Although the Bloor Homes site inside the Bypass on Worgret Road has an average walking distance less than Ferncroft or Tantinoby (Table B1) all three sites remain comparable;
  3. The Ferncroft and Tantinoby sites would provide employment, SANGS, and a potential improved pedestrian/cycle link from North Wareham to the Primary and Secondary Schools; they are the closest to the rail station and the main bus route; they are the only sites that would provide this combination of community benefits.
- 2.7 In contrast the Preliminary Assessment of sites and the Draft Review of the Green Belt appear to be potentially unsound. That therefore also applies to the "Where shall we build in Wareham?" Consultation Leaflet. Thus a Core Strategy based on these documents is liable to be unsound.

### **3. BACKGROUND PAPER 6: SETTLEMENT EXTENSION SITES**

#### **3.1 The Local Councils**

We note that from paragraph 5.3.3 that Wareham St Martin Parish Council and Arne Parish Council supported Option C (a combination of development along Worgret Road and in parts of North Wareham). It would reduce the impact of the number of dwellings on any one location, and has the potential to deliver all of the potential benefits in both options A and B for the town.

#### **3.2 Options for Wareham (Section 6.3)**

We are concerned that the Tantinoby and Ferncroft sites have been presented as one option. In reality they represent a variety of options. For example:

- a) Both sites together which could (at densities of around 30 dph) achieve up to 400 dwellings in total.
- b) The Tantinoby site by itself could provide 150-200 dwellings.
- c) The Ferncroft site by itself could provide 150-200 dwellings.
- d) Part of Tantinoby could provide (say) 100 dwellings whilst retaining the allotments.
- e) The northern part of Ferncroft north of Carey Road could provide up to 50 dwellings.
- f) A combination of (d) and (e) could create 150 dwellings plus employment at Westminster Road, and retaining the Tantinoby allotments.

#### **3.3 Appendix 3**

We note from page 20 that land adjoining Tantinoby Farm is referenced 23/0166, land adjoining Ferncroft Farm is referenced 23/0167, and land off Worgret Road (the Bloor's site inside the bypass) is referenced 23/0173.

#### **3.4 Appendix 4: Preliminary Assessment Tables**

We note the assessment made of Tantinoby, Ferncroft, and the Bloor Homes site on pages 35-36, and are concerned that the assessment may be unevenly balanced and unduly favours the Bloor Homes site.

- 3.5 It is noted that the right hand columns of the assessment tables place a tick under G for green, A for amber or R for red, forming a "traffic light" assessment, whereby the assessment of each particular element is regarded as being acceptable, in need of mitigation, or a "show stopper" respectively. It is acknowledged that this is a preliminary assessment, but it is important that it is sufficiently refined to form a sound basis on which to select sites for the Core Strategy.

#### **3.6 Tantinoby**

We have concerns about the following assessment elements:

- a. Ecology:
  - i) We note that there is a band of TPO trees on the site that may offer good wildlife habitat/corridor;
  - ii) These need not be disturbed by the development, but rather retained and incorporated within it;
  - iii) In addition, a substantial tree planting scheme was suggested on our illustrative sketch Master Plan exhibited at the Road Show on 12 July 2010;
  - iv) Therefore this assessment is unduly unbalanced against the site.
  - v) Furthermore, no reference whatever is made to the fact that, because the site belongs to the Charborough Estate, extensive SANGS could be provided in proportion to the total number of dwellings.
  
- b. Flood Risk:
  - i) Obviously, sites within the floodplain should not be considered;
  - ii) Whilst there would in theory be a possibility for surface water run-off, in practice, neither the LPA nor the Environment Agency would accept any development without a Flood Risk Assessment (FRA) which demonstrated clearly that there would be no adverse affects from surface water run-off through the combination of sustainable urban drainage systems (SUDS) and on-site attenuation measures forming an integral part of the development;
  - iii) Therefore, again, this assessment weighs unduly weighs against the site.
  
- c. Highways:
  - i) The main vehicular access point would be direct off Bere Regis Road, with a secondary access only into the Northmoor Park Estate, in order to reduce so far as possible, traffic through the Northmoor Park Estate;
  - ii) Furthermore, parking would be provided for the SANGS which would also accommodate persons using the Forestry Commission open access land, and that could actually reduce traffic into Northmoor Park Estate. Therefore, again, the tick against Highways should be in the "G" column.

### 3.7 Ferncroft

Again we have very similar concerns regarding the following:

- a) Ecology: Again there is no reason whatever why the TPO trees should not be retained on site, and our illustrative sketch master plan showed a substantial additional tree planting; again, no reference is made of the fact that this site, like Tartinoby, but unlike the Bloor site, could provide substantial SANGS;
- b) Flood Risk: Again, there is no reason why this site should not be able to provide SUDS and onsite attenuation to avoid any adverse effect from surface water run-off.



- c) **Green Belt:** It is stated that development could lead to limited westerly spread of the settlement but this could be contained by the topography; the following points should be noted:
  - i) The site is contained within the constraint imposed by Tatchells Pit (as potentially expanded).
  - ii) The proposal is to keep the development below the 25m contour line (exactly the same as the Tantinoby site); on that basis the tick should be in the G column, not the A column;
- d) **Highways:** We agree with the comments made, but the assessment omits the potential for the Charborough Estate to provide, together with the land owners south of the river, an improved pedestrian cycle route to the primary and secondary schools have been omitted.

### 3.8 The Bloors Site

The following assessments appear to have been made on an over optimistic basis:

- a) **Landscape:** We accept that this is a flat site – but we disagree that development would not be prominent in views of the wider landscape – it would be very prominent from the Bypass; the tick should be in the A column.
- b) **Greenbelt:** This site would need to be released from the Green Belt in exactly the same way as Tantinoby or Ferncroft and again the tick should be in the A column, not the G column.

## 4. PURBECK DISTRICT GREEN BELT REVIEW DRAFT REPORT

### 4.1 Executive Summary

We note from page 2 that sites at Wareham are regarded as suitable or partly suitable as follows:

North of Worgret Road and Middle School – "Suitable"  
Purbeck School and Sports Centre – "Suitable"  
Woodbine Cottage (north of Carey Road) – "Suitable"  
Land adjoining Tantinoby Farm – "Partly Suitable"  
Factory Field off Causeway Close – "Partly Suitable"

### 4.2 Analysis of Greenbelt in terms of function and sensitivity to change

We note from figure 5 on page 15 that the Green Belt in its wider sense around each key settlement is assessed in terms of another "traffic light" appraisal system whereby:

- Green = fully fulfils all Green Belt purposes
- Amber = fulfils some Green Belt purposes only
- Red = fulfils no Green Belt purposes at all

### 4.3 The Green Belt purposes identified from PPG2 as set out at paragraph 5.1 of the report are to:

- Check the unrestricted **sprawl** of large built-up areas
- To prevent neighbouring towns from **merging** into one another
- To assist in safeguarding from **countryside encroachment**
- To preserve the **setting** of historic towns.
- To assist in **urban regeneration** by encouraging recycling of derelict and other urban land.

### 4.4 Sandford

On that basis the Green Belt around Sandford is assessed as:

- Green – preventing merging of settlements
- Green – preventing countryside encroachment
- Amber – to some extent preventing sprawl
- Red – not contributing to historic setting at all
- Red – not contributing to urban regeneration at all

The Charborough Estate broadly agrees with this assessment in so far as it applies to the Green Belt as currently delineated at Sandford, but not including the "white land".

#### 4.5 Wareham

At paragraph 5.8 on page 17 the Green Belt around Wareham is identified as fulfilling all Green Belt functions, including historic setting and urban regeneration. The Charborough Estate questions this assessment with regards to sprawl.

- 4.6 The Tantinoby Site is contained by the golf course (and beyond that the Forestry Commission land). The Ferncroft site is contained by Tatchells Pit and the potential extension to that. The Bloors site is contained by the by-pass. We therefore contend that the Green Belt as far as those three sites are concerned does not in fact contribute significantly to the preventing of sprawl.
- 4.7 We also question whether Tantinoby and at least the northern part of the Ferncroft site contribute to the historic setting of the town. It may well be argued that the southern part of the Ferncroft site contributes to the historic setting of the town, and certainly the Bloors site does. However, the Tantinoby site, and the northern part of the Ferncroft site are not readily visible from the walls of the historic town, let alone any other part of the historic town, and are substantially separated from the historic town by the modern development of Carey and Northmoor Park.

#### 4.8 Potential for Strategic Releases in North Wareham

We note that on page 28 Map 3 outlines the potential for strategic releases in North Wareham. It is noted that the draft assessment is (with regard to the interests of the Charborough Estate):

- a) Land adjoining Tantinoby Farm: Partly suitable (except an area to the north east of the Farm itself).
- b) Land rear of Westminster Road – this claims that provided development was located towards the southern part of this site and did not breach the western boundary Woodbine Cottage the sprawling and encroaching affects would be reduced and that part of the site would be suitable for release from the Green Belt.
- c) Woodbine Cottage – the report states "This small area fits within a dip and is well screened along the roadside by vegetation. The site would offer a good degree of self-containment for a small number of dwellings and would not result in a westward sprawling effect for the settlement". It is therefore considered suitable.
- d) Land adjoining Ferncroft Farm – is stated as dominated by small hills which contain the existing settlement and any urban extension that breached that containment would result in a highly visible encroachment into the countryside and would be extremely harmful; it is therefore unsuitable for release from the Green Belt.

- 4.9 The main concern of the Charborough Estate relates to land at the rear of Westminster Road and land adjoining Ferncroft Farm and Woodbine Cottage. It needs to be emphasised that the intentions with regard Ferncroft Farm and the extension to Westminster Road were to keep the development within the 25m contour, which is exactly the same contour which limits the Tantinoby

potential development site. In particular, the assessment at Map 3 ignores the fact that there is a small valley or coombe which extends along Carey Road below the 25m contour within which both the Westminster Estate could be extended and up to 50 dwellings could be built without having the effects which are claimed.

- 4.10 We also note that whereas the Green Belt at Woodbine Cottage, Tantinoby Farm, Westminster Road, and Factory Field (off Causeway Close) are analysed in more detail at paragraph 7.13-7.19 on pages 29-31, no such analysis is undertaken of the Ferncroft site.

#### 4.11 Potential Green Belt Extension – Sandford

It is noted that at paragraphs 8.6 – 8.9 and Figure 9 on pages 44-45 that it is proposed to delete the "white land" on the south side of Sandford and include it within the Green Belt. The Charborough Estate are very strongly opposed to this as currently proposed.

- 4.12 The Sandford "white land" came about due to the need for housing development to fund the Sandford Bypass. Deletion of the white land and including it in the Green Belt would permanently prevent such enabling development and thus in turn prevent the Bypass should circumstances change. Whilst the prospects for the Bypass are currently very poor, significant elements of the Local Community appear to still hope for provision of the bypass.
- 4.13 The white land contributes nothing to the separation of Sandford from Wareham or Holton Heath. It contributes little to preventing the sprawl of Sandford since the settlement is ultimately constrained on the south side by the railway line; it does not contribute to the setting of a historic town and the very small area of countryside contained in it, although open, is of no visual quality at all. We cannot therefore see how deletion of the white land on its own can be justified. It would be thus unsound.
- 4.14 The only justification for deletion of the Sandford white land could be if both the Tantinoby and Ferncroft sites were removed from the Green Belt. In that case there could be an argument in favour of deleting the Sandford white land to compensate for that. But the Charborough Estate would strongly object to deleting the Sandford white land solely to compensate for the removal from the Green Belt of land in other ownerships.

**5. "WHERE SHALL WE BUILD IN WAREHAM?"**

- 5.1 In broad terms we support Option C for the reasons outlined above at our paragraphs 2.4 and 3.1.
- 5.2 As outlined in our 3.2 above, Option C could in fact represent a variety of options, which should be noted and considered.
- 5.3 Our Section 3 above outlines our concerns as to the assessment made of the Tantinoby and particularly the Ferncroft sites.
- 5.4 We most certainly do not agree that landscape issues rule out Ferncroft. Development of Ferncroft could be contained within the 25m contour (as with the Tantinoby site).
- 5.5 The leaflet also does not identify that:
- a) Tantinoby is contained by the golf course and Ferncroft by Tatchells Pit, so neither would be the beginning of uncontrollable sprawl.
  - b) Three out of four sites (including Bloor Homes, but excluding Worgret Manor) would need to be released from the Green Belt and are thus equal in that respect.
- 5.6 Likewise it should explain that the Tantinoby and Ferncroft sites could also provide extensive SANGS and a potential direct link from Carey to the primary and secondary schools. They would also be combined with additional employment on the Westminster Estate.
- 5.7 For all these reasons we consider that the preliminary assessment is sound enough as a basis for sound public consultation leading to a sound Core Strategy. In comparison, we consider our revised Tables A, B1 and B2 are sound, and should therefore be taken into account.

**TABLE A: STRATEGIC COMPARISON OF SWANAGE AND WAREHAM (REVISED)**

<b>FACILITY</b>	<b>Swanage</b>	<b>Wareham</b>
1. Schools a) Primary b) Secondary	2	1 1
2. Industrial Estate(s) & Business Parks a) Existing b) Scope for more c) Good access to Holton Heath d) Good access to Winfrith	1	2 1 1 1
3. Town Centre (Retail & Employment)	1	1
4. Supermarkets a) Existing b) Potential for 2000 sq m supermarket	1 1	1 1
5. Recreation and Leisure a) Theatre/ Cinema b) Public Sports Centre c) Potential SANGS d) Beach	1  1	1 1 1
6. Public Transport a) Half hourly electric train service b) Swanage Branch (from 2013) c) More than hourly bus	1	1 1
<b>TOTAL</b>	<b>9</b>	<b>15</b>

**TABLE B1 SHORTEST DISTANCE IN METRES (REVISED)**

<b>Destination</b>	<b>Tantinoby</b>	<b>Ferncroft</b>	<b>Worgret Road (inside bypass)</b>
Purbeck School	1795	1690	890
Primary School	2495	1550	150
Bus Route with more than 1 bus per hour	820	725	890
Rail Station	930	825	1310
Town Centre	1685	1790	890
Westminster Road Industry	545	425	1645
Sandford Lane Industry	1395	1290	1755
Purbeck Leisure Centre	2695	1750	350
Potential SANGS	50	70	1755
<b>AVERAGE</b>	1379	1124	1074

**TABLE B2 (REVISED)**

PRINCIPAL DEVELOPMENT	DIRECTIONS AT WAREHAM		
	Worgret Road	Ferncroft Farm	Tantinoby Farm
Issue			
Green Belt?	X	X	X
Not in AoNB?	✓	✓	✓
No Adverse Landscape Impact?	✓	✓	✓
Out of Floodplain?	✓	✓	✓
Provide Extensive SANGS	X	✓	✓
Not Affect SSSI/SPA	✓	✓	✓
Support Town Centre	✓	X	X
Support Development of Further Employment	X	✓	✓
Accessible	✓	✓	✓
Adverse Impact on Amenity of Existing Residents	✓	X	X
	✓ 7 X 3	✓ 7 X 3	✓ 7 X 3